

GREENPORT

Capital Advisors

Disclosure Brochure - Form ADV Part 2A (CRD# 205511)

July 8, 2024

33 Bradford St, Concord, MA 01742

978-393-3090

www.greenportcapitaladvisors.com

Form ADV, Part 2A; our “Disclosure Brochure” or “Brochure” as required by the Investment Advisers Act of 1940 is a very important document between clients (also referred to as “you” or “your”) and GREENPORT CAPITAL ADVISORS, LLC (also referred to as “GREENPORT”, “us”, “we” or “our”). This Brochure provides information about our qualifications and business practices.

If you have any questions about the contents of this Brochure, please contact us at 978-393-3090 or info@greenportcapitaladvisors.com. The information in this Brochure has not been approved or verified by any government authority.

GREENPORT CAPITAL ADVISORS, LLC is registered with the State of Massachusetts Securities Division as a Registered Investment Adviser firm. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide to you, including this Brochure, is information you use to evaluate us (and other advisers) which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship.

Additional information about GREENPORT CAPITAL ADVISORS, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov (click on the link, select “investment adviser firm”, and type in our firm name). Results will provide you both Part 1 and Part 2 of our Form ADV.

Item 2. Material Changes

In this Item, GREENPORT is required to discuss any material changes that have been made to the brochure since the last annual amendment.

Dwight Davenport resigned effective immediately on June 3, 2024 from GreenPort Capital Advisors. Marcus Green and Robert Kea are now the owners of GreenPort Capital Advisors.

We may, at any time, update this Brochure and either send you a copy or offer to send you a copy (either by electronic means (email) or in hard copy form), without charge.

Currently, our Brochure may be requested by contacting Marcus Green (CCO) at 978-393-3090 or info@greenportcapitalcapitaladvisors.com. Our Brochure is also available on our web site www.greenportcapitalcapitaladvisors.com, also free of charge.

Additional information about GREENPORT CAPITAL ADVISORS, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with GREENPORT who are registered, or are required to be registered, as investment adviser representatives of GREENPORT.

Item 3. Table of Contents

Item 2. Material Changes	2
Item 4. Advisory Business	4
Item 5. Fees and Compensation	5
Item 6. Performance-Based Fees and Side-By-Side Management	8
Item 7. Types of Clients	8
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9. Disciplinary Information	12
Item 10. Other Financial Industry Activities and Affiliations	12
Item 11. Code of Ethics	12
Item 12. Brokerage Practices	14
Item 13. Review of Accounts	15
Item 14. Client Referrals and Other Compensation	15
Item 15. Custody	16
Item 16. Investment Discretion	16
Item 17. Voting Client Securities	17
Item 18. Financial Information	17
Item 19. Requirements for State-Registered Advisers	18

Item 4. Advisory Business

GreenPort Capital Advisors, LLC provides clients with personalized investment and financial management services, which generally include a broad range of comprehensive financial planning and consulting services as well as discretionary management of investment portfolios. Our office is located at 33 Bradford St, Concord, MA 01742, and our phone number is (978) 393-3090. GREENPORT was legally organized as a Massachusetts Limited Liability Company in 2015 and the principal owners are Robert Kea and Marcus Green.

We do not have or employ any employee that receives (directly or indirectly) any compensation from the sale of securities or investments that are purchased or sold for your account or to which we provide consulting expertise/services. As a result, we are a “fee based” investment adviser.

Our investment management services begin with a detailed data gathering and interview process designed to help us review your goals, objectives, time horizon and risk tolerance. Based upon your input, GREENPORT will develop advice and recommendations that are consistent with your stated investment policy.

GREENPORT’s general investment philosophy is to seek good risk-adjusted returns while maintaining a long-term perspective. Most GREENPORT investment strategies offer a broadly diversified portfolio of securities, with periodic adjustments consistent with a disciplined investment process. Careful attention is paid to managing the costs of investing, both explicit (trading commissions, and security expense ratios) and implicit (tax implications, and liquidity constraints). GREENPORT offers a broad suite of strategies, suitable for investors ranging from conservative to growth oriented.

You may specify in your investment advisory agreement with GREENPORT whether you wish to impose certain restrictions on the investment of your account(s). For example, you may restrict your investments to socially responsible securities, or you may instruct us not to sell certain of your assets. As noted above, we will develop advice and recommendations consistent with your instructions and goals.

Once your portfolio has been implemented, GREENPORT provides continuous monitoring, recommendations and investment advice as outlined in the engagement for services.

Internal portfolio reviews entail security analysis, portfolio market sensitivity, macroeconomic conditions, investment results and asset allocation elections.

As of July 8, 2024, GREENPORT had \$97,890,737 in assets under management. Of that total, \$97,820,859 represented discretionary assets and \$69,878 represented non-discretionary assets.

Item 5. Fees and Compensation

Advisory Fees:

A. Investment Management Services

GREENPORT's portfolio management fee for our investment management services is based on total managed assets per client, as follows:

First \$3m in assets:	1.00%
Next \$5m in assets:	0.75%
All additional above \$8m in assets:	0.50%

Our advisory fees are paid quarterly in advance, based upon the market value of the client's portfolio as of the last market day of the previous calendar quarter. If investment management services are initiated at any time other than the beginning of a calendar quarter, our fees are prorated from that date.

Our fees for investment management services may be modified in certain circumstances and may be based upon individual circumstances and the complexity of services required. Investment management fees are determined at the time of engagement and all fees are clearly disclosed in the investment advisory agreement signed by each client.

Our advisory fees are not based upon a share of capital gains or capital appreciation of the funds of any portion of funds of an advisory contract. Fees are not collected for services to be performed more than six months in advance.

Additional Fees and Expenses:

Our fees for our investment management services do not include all the fees you will pay when we purchase or sell securities for your account(s). The following list of fees or expenses are what you may pay directly to third parties, whether a security is being purchased, sold or held in your account(s) under our management. Fees charged are by the broker dealer/custodian.

We do not receive, directly or indirectly any of these fees charged to you. They are paid to your broker, custodian or the mutual fund or other investment you hold. The fees include:

- Brokerage commissions;
- Transaction fees;
- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by Mutual Funds (“MF”) and Exchange Traded Funds (“ETFs”);
- Custodial fees;
- Wire transfer and electronic fund processing fees;
- Commissions or mark-ups / mark-downs on security transactions; and
- Other fees that may be incurred.

A complete explanation of the expenses charged by the mutual funds are contained in each mutual fund’s prospectus. Clients are encouraged to read each fund prospectus or securities offering document carefully before investing.

In addition, we do not have or employ any employee at all that receives (directly or indirectly) any compensation from the sale of securities or investments that are purchased or sold for your account or to which we provide consulting expertise/services. As a result, we are a “fee based” investment adviser. We do not have any potential conflicts of interest present that relate to any additional (and undisclosed) compensation from you or your assets that we manage.

Fee Payment Options:

A. Investment Management Services

As indicated in our investment advisory agreement with you, there are two options you may select to pay for our investment management services:

- *Direct debiting:* At the inception of the relationship and each quarter thereafter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. The custodian does not validate or check our fee. They will “deduct” the fee from your account(s) or, if you have more than one account with us, from the account you have designated to pay our advisory fees.
 - Each month and/or quarter, you will receive a statement directly from your custodian showing all transactions, positions and credits/debits into or from your account; the statements after the quarter end will reflect these transactions, including the advisory fee paid by you to us. Since custodians do not verify the accuracy of the advisory fee calculation, clients should verify each copy of the quarterly invoice and contact us if any questions should arise.
 - GREENPORT distributes quarterly performance and billing reports to clients for each account under management.
- *Pay-by-check:* At the inception of your account and each quarter thereafter, we will issue you an invoice for our investment management services, and you will pay us by check or wire transfer within 15 days of the date of invoice.

Termination of Services:

A. Investment Management Services

Clients may terminate their investment advisory agreement with us without penalty (full refund or no fees due) within 5 business days of signing the agreement where our Form ADV Part 2 was not delivered at least 48 hours prior to the client’s execution of the agreement. Otherwise, Investment management services may be terminated by either party by written notice to the other party. If termination occurs prior to the end of a calendar quarter, a pro-rata refund of any unearned fees will be made to the client.

Item 6. Performance-Based Fees and Side-By-Side Management

GREENPORT does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Our advisory fee compensation is charged only as disclosed above (Item 5).

Item 7. Types of Clients

GREENPORT provides portfolio management services to a number of types of clients:

- High net worth individuals/families
- Individuals/families (other than high net worth)
- Retirement plans
- Trusts, estates, and charitable organizations
- Investment companies

GREENPORT generally requires a minimum relationship size of \$1,000,000 of managed assets. We reserve the right to waive the minimum relationship size based upon pre-existing relationships, the ability to reach the minimum within a certain time period, for family members of advisory personnel, or other special circumstances.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies:

GREENPORT generally uses diversification in an effort to optimize the risk and potential return of a portfolio. More specifically, we may utilize multiple asset classes, investment styles, market capitalizations, sectors, and regions to provide diversification. Each client's

portfolio selection is determined in accordance with the clients' investment objectives, risk tolerance, and time horizon.

GREENPORT may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- **Charting & Technical Analysis** – involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed for patterns and trends. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.
- **Fundamental Analysis** – involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.
- **Cyclical Analysis** – a type of technical analysis that involves evaluating recurring price patterns and trends.
- **Long Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- **Short Term Purchases** – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Risk of Loss:

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. Investment portfolios managed by GREENPORT may lose value.

Stocks: Investing in stocks involves the assumption of risk including:

- Financial Risk: which is the risk that the companies we recommend to you may perform poorly which will affect the price of your investment.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities we recommend to you with it.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.
- Political and Governmental Risk: which is the risk that the value of your investment may change with the introduction of new laws or regulations.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general the fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below). Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Options: While we typically do not trade options in any of our investment strategies, this disclosure is provided to inform all of our clients about some of the possible risks associated with such positions. This brief statement does not disclose all of the risks and other significant aspects of trading in futures and options.

- *Variable degree of risk* - Transactions in options carry a high degree of risk. Purchasers and sellers of options should familiarize themselves with the type of option (i.e., put or call) which they contemplate trading and the associated risks. Traders of options should calculate the extent to which the value of the options must increase for the position to become profitable, taking into account the premium and all transaction costs.
- The purchaser of options may offset or exercise the options or allow the options to expire. The exercise of an option results either in a cash settlement or in the purchaser acquiring or delivering the underlying interest. If the purchased options expire worthless, the purchaser will suffer a total loss of the investment. In purchasing deep out-of-the-money options, the purchaser should be aware that the chance of such options becoming profitable ordinarily is remote.
- Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will be liable for additional margin to maintain the position if the market moves unfavorably. The seller will also be exposed to the risk of the purchaser exercising the option and the seller being obligated to either settle the option in cash or to acquire or deliver the underlying interest. If the option is "covered" by the seller holding a corresponding position in the underlying interest or a future or another option, the risk may be reduced. If the option is not covered, the risk of loss can be unlimited.
- Certain exchanges in some jurisdictions permit deferred payment of the option premium, exposing the purchaser to liability for margin payments not exceeding the amount of the premium. The purchaser is still subject to the risk of losing the premium and transaction costs. When the option is exercised or expires, the purchaser is responsible for any unpaid premium outstanding at that time.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt

and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of GREENPORT or the integrity of GREENPORT's management. GREENPORT has no history of any disciplinary action. You can obtain our disciplinary history upon request from the Massachusetts Securities Division.

This statement applies to our firm, and every employee.

Item 10. Other Financial Industry Activities and Affiliations

The sole business of GREENPORT is to provide portfolio management and financial planning services to its Clients. GREENPORT does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

Item 11. Code of Ethics

GREENPORT has adopted a Code of Ethics ("CODE") for all supervised persons of our firm describing our high standard of business conduct and fiduciary duty to our clients. An additional purpose of our CODE is to detect and prevent violations of securities laws, including our obligations we owe to you.

Our CODE is comprehensive, is distributed to each employee at the time of hire, and annually thereafter (if there are changes). We also supplement the CODE with annual training and on-going monitoring of employee activity.

Our Code of Ethics includes the following provisions, among others:

- confidentiality of client information
- a prohibition on insider trading
- a prohibition of rumor mongering
- restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items
- personal securities trading procedures

Our CODE does not prohibit personal trading by employees (or our firm). As you may imagine, as a professional investment adviser, we follow our own advice. As a result, we may purchase or sell the same or similar securities (or securities that are suitable for an employee or related account but not suitable for any client, including you) at the same time that we place transactions for your account and the accounts of our other clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of GREENPORT will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the CODE, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of GREENPORT's clients. In addition, the CODE requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, as noted above, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between GREENPORT and our clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with GREENPORT's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and

receive securities at a total average price. GREENPORT will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained in the order.

You may request a copy of our Code of Ethics by contacting Marcus Green.

Item 12. Brokerage Practices

GREENPORT generally utilizes TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC (“CUSTODIAN”), for our advisory transactions and as our qualified custodian.

However, you are welcome to direct GREENPORT to work through other brokerage firms of your choice. When you direct us to use a certain broker, we can’t ensure that you will receive best execution of the trades for which we send to the broker you choose. In addition, if you direct us to use a specific broker, GREENPORT will most likely not have the authority or ability to negotiate commission rates and therefore you may pay higher commission fees.

GREENPORT does not have any arrangements, verbal or written, to participate in any “soft dollar” programs. The Advisory Representatives of GREENPORT are not Registered Representatives of any broker/dealer firm. Because of our use of TD Ameritrade Institutional as our qualified custodian, we may have the opportunity to receive traditional “non-cash benefits” such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client accounts; access (for a fee) to an electronic communication network for client order entry and account information; reporting features; and perhaps discounts on business-related products. While CUSTODIAN does not directly provide any research to us, it may make available to us various free or discounted research products or subscriptions. Any research received is used for the benefit of all clients. Computer real-time software may be purchased through CUSTODIAN or independent companies to facilitate sending and receiving account information.

Item 13. Review of Accounts

Our Investment management services are on-going in nature and involve continuous review and advice regarding your investment portfolio. We will conduct frequent internal reviews (generally quarterly) of your portfolio. Internal portfolio reviews depend upon the underlying assets of the portfolio, individual circumstances, market conditions and the request of the client. Reviews are conducted by Robert Kea, Marcus Green, and the staff of GREENPORT.

For our clients, we request that reviews of the client's accounts occur at least quarterly (via phone or in person) and at the client's request. However, GREENPORT encourages clients to frequently communicate with us in order to continually review ongoing investment strategies.

Advisory personnel who are unregistered may assist with administrative and client services. Investment advisory services are provided solely by the Advisory Representatives of GREENPORT.

Clients receive standard quarterly and transactional account statements from their selected custodian(s). GREENPORT may provide informal reports, assessments, or post-meeting communications, at our discretion.

For tax and other purposes, the custodial statement is the official record of your account(s) and assets.

Item 14. Client Referrals and Other Compensation

Other than that already described in this Brochure, GREENPORT does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

In the event a client is introduced to GREENPORT by either an unaffiliated or an affiliated solicitor, GREENPORT may pay that solicitor a referral fee in accordance with applicable state securities laws. Unless otherwise disclosed, any such referral fee is paid solely from GREENPORT's investment management fee and does not result in any additional charge to the client. If the client is introduced to the Firm by an unaffiliated solicitor, the solicitor is

required to provide the client with GREENPORT's written brochure(s) and a copy of a solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement. Any affiliated solicitor of the Firm is required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of the Firm's written brochure(s) at the time of the solicitation.

Item 15. Custody

GREENPORT does not have custody of any client funds. A qualified custodian holds the account funds for all of our clients. As noted in Item 12 above, GREENPORT's primary custodian is TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC.

Clients will receive at least quarterly statements directly from the broker dealer, bank or other qualified custodian that holds and maintains the client's investment assets.

GREENPORT urges you to carefully review such statements and compare your official custodial records to the account statements that we may provide to you. Our performance reporting statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. We currently utilize Orion Advisory Services, LLC for portfolio accounting and performance services.

For tax and other purposes, the custodial statement is the official record of your account(s) and assets.

Item 16. Investment Discretion

GREENPORT usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold.

For those discretionary accounts, GREENPORT receives discretionary authority from the client, through the investment advisory agreement, at the outset of an advisory relationship. With respect to these discretionary accounts, we retain full authority to determine securities to be bought or sold, the amount of securities to be bought and sold, the broker or dealer to be used, and the commission rates paid to such broker or dealer.

While clients do not specify limits on this authority, we endeavor to maintain a balanced portfolio in each account and to exercise our discretion in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, GREENPORT observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, GREENPORT's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. In addition, you may specify in your investment advisory agreement with GREENPORT whether you wish to impose certain restrictions on the investment of your account(s). For example, you may restrict your investments to socially responsible securities, or you may instruct us not to sell certain of your assets. As noted above, we will develop advice and recommendations consistent with your instructions and goals.

Investment guidelines and restrictions must be provided to GREENPORT in writing.

Item 17. Voting Client Securities

GREENPORT will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, GREENPORT cannot give any advice or take any action with respect to the voting of these proxies.

Item 18. Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about GREENPORT's financial condition.

- The firm does not require or solicit the prepayment of more than \$500 in fees six months or more in advance of services rendered.
- The firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients
- The firm has not been the subject of a bankruptcy proceeding

Item 19. Requirements for State-Registered Advisers

As described in further detail in our Part 2B of Form ADV, also called our Brochure Supplement, Robert Kea and Marcus Green are investment advisor representatives.

Additional Information

Neither the Firm nor its Supervised Persons are compensated for advisory services with performance-based fees. Neither the Firm nor its Supervised Persons have been the subject of the type of disciplinary event that warrants disclosure pursuant to this Item. Neither the Firm nor its Supervised Persons have a material relationship or arrangement with any issuers of securities.