

Item 1 – Cover Page
of
Brochure Supplement for
Sacha Millstone
CRD# 1372149

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Sacha Millstone that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Sacha Millstone is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Sacha Millstone (year of birth 1959) is an owner and serves as the Manager and an Investment Adviser Representative of the Adviser.

Ms. Millstone earned a Bachelor of Arts degree in Economics and Political Science from Earlham College in 1981. She also earned a Master of Business Administration degree in Finance from George Washington University in 1986.

Previously, Ms. Millstone served as a registered representative of Raymond James & Associates (May 1994 – January 2021).

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. Millstone has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Ms. Millstone is not actively engaged in any other investment-related businesses or occupations.
- B. **Licensed Insurance Agent.** Ms. Millstone, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Millstone to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Millstone that a client purchase an insurance commission product presents a ***conflict of interest***, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Millstone. Clients are reminded that they may purchase insurance products recommended by Ms. Millstone through other, non-affiliated insurance agents. **The Adviser's Chief Compliance Officer, Byron Wilson, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 – Additional Compensation

Ms. Millstone has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief

Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page
of
Brochure Supplement for
Gregory Evans
CRD# 726398

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Greg Evans that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Greg Evans is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Greg Evans (year of birth 1955) is as an owner and serves as an Investment Adviser Representative of the Adviser.

Mr. Evans was a candidate for a Bachelor of Science degree in Business Administration from Towson University.

Previously, Mr. Evans served as an Investment Adviser Representative and Registered Representative for Raymond James & Associates (July 1997 – January 2021).

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Evans has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Mr. Evans is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Evans is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Mr. Evans has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page
of
Brochure Supplement for
Madeline Stutz
CRD# 311142

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Madeline Stutz that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Madeline Stutz is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Madeline Stutz (year of birth 2000) is an Investment Adviser Representative of the Adviser.

Ms. Stutz earned a Bachelor of Science degree in Finance from University of Colorado at Boulder in 2023.

Previously, Ms. Stutz was a student.

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. Stutz has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Ms. Stutz is not actively engaged in any other investment-related businesses or occupations.
- B. Ms. Stutz is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Ms. Stutz has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page of

Brochure Supplement for

Martial Frindethie

CRD# 6012617

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Martial Frindethie that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Martial Frindethie is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Martial Frindethie (year of birth 1991) serves as an Investment Adviser Representative of the Adviser.

Mr. Frindethie is a candidate for a Bachelor of Arts degree in General Studies from Southern New Hampshire University in 2025.

Previously, Mr. Frindethie served as a Senior Client Relationship Coordinator for Raymond James & Associates Inc. (December 2011– expected January 2021).

Mr. Frindethie holds the following professional designation(s):

Accredited Asset Management Specialist™ (AAMS™)

The AAMS™ is awarded by the College for Financial Planning® to investment professionals who complete its 12-module AAMS™ Professional Education Program, pass an examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the AAMS™ designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the AAMS™ designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Certified College Planning Specialist™ (CCPS®)

The CCPS® designation is awarded by the National Institute of Certified College Planners (NICCP®), a private organization. Prerequisites include a professional financial certification/designation, a professional financial license (securities, insurance, accounting, etc.), or a combination of education and experience deemed satisfactory by the NICCP Advisory Council. Average study time to earn the CCPS® is approximately 18 to 25 hours for three modules and a final course exam for each module. The modules consist of financial aid overview, college loans, Section 529 qualified tuition programs, retirement accounts as they pertain to saving for college, life insurance, real estate, work study, and alternative loans. Certification requires 24 CE hours every year. CCPS® holders agree to comply with the National Institute of Certified College Planners code of ethics and procedures.

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Frindethie has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Mr. Frindethie is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Frindethie is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Mr. Frindethie has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page of

Brochure Supplement for

Toni A. Noto
CRD# 1454948

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Toni Noto that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Toni Noto is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Toni Noto (year of birth 1957) is an Investment Adviser Representative of the Adviser.

Ms. Noto was a candidate for a Bachelor of Science degree in International Business Studies from Eckerd College in 1985.

Previously, Ms. Noto served as an Investment Adviser Representative for Raymond James & Associates Inc. (May 2016 – expected January 2021), and as a Registered Representative with Raymond James & Associates Inc. (August 2013 – expected January 2021).

Ms. Noto holds the following professional designation(s):

Wealth Management SpecialistSM (WMSSM)

The College for Financial Planning awards the WMSSM designation to applicants who complete the professional education program, pass a final examination, commit to a code of ethics, and agree to pursue continuing education. The program provides new advisors with a substantial overview of the most critical concepts in financial planning and wealth management, without the rigors of the CFP® certification or a more comprehensive professional designation. All WMSSM designation holders are required to complete 16 hours of continuing education (CE) credits every two years. The WMSSM designation program is for those who are involved with customer transactions and recommendations of all financial services products.

Accredited Asset Management Specialist[™] (AAMS[™])

The AAMS[™] is awarded by the College for Financial Planning® to investment professionals who complete its 12-module AAMS[™] Professional Education Program, pass an examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the AAMS[™] designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the AAMS[™] designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. Noto has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Ms. Noto is not actively engaged in any other investment-related businesses or occupations.
- B. **Licensed Insurance Agent.** Ms. Noto, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Noto to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Noto that a client purchase an insurance commission product presents a ***conflict of interest***, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Noto. Clients are reminded that they may purchase insurance products recommended by Ms. Noto through other, non-affiliated insurance agents. **The Adviser's Chief Compliance Officer, Byron Wilson, remains available to address any questions that a**

client or prospective client may have regarding the above conflict of interest.

Item 5 – Additional Compensation

Ms. Noto has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page of
Brochure Supplement for
William Leonard Kowalski, Jr.
CRD# 6308695

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about William Kowalski that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about William Kowalski is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

William Kowalski (year of birth 1986) is a Vice President of Finance and Investments of the Adviser.

Mr. Kowalski earned an Associate of Applied Science degree in Mortuary Science from Nassau Community College in 2006. He also earned a Bachelor of Science degree in Finance from SUNY Empire State College in 2014.

Previously, Mr. Kowalski was the Chief Operating Officer for Atomos Nuclear and Space Corporation (May 2018 – February 2025) and a Financial Advisor for The Millstone Evans Group of Raymond James & Associates (February 2014 – May 2018).

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Kowalski has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Mr. Kowalski is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Kowalski is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Mr. Kowalski has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

**Item 1 – Cover Page of
Brochure Supplement for
Joseph Douglas Morris
CRD# 7587049**

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement (“Supplement”) provides information about Joseph Morris that supplements the brochure of The Millstone Evans Group, LLC (the “Adviser”) brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser’s brochure or if you have any questions about the contents of this Supplement.

Additional information about Joseph Morris is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Joseph Morris (year of birth 2000) is a Client Service Associate of the Adviser.

Mr. Morris earned a Bachelor of Science degree in Business Administration from University of Colorado, Boulder in 2018.

Previously, Mr. Morris was an employee of Transamerica Capital, Inc. (June 2022 – April 2024) and was a full-time student prior to that.

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Morris has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Mr. Morris is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Morris is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Mr. Morris has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.

Item 1 – Cover Page of

Brochure Supplement for

Benjamin D. Kirby

CRD# 5168016

The Millstone Evans Group, LLC CRD# 311142

4940 Pearl East Circle, Suite 302
Boulder, Colorado 80301

720-728-2801

Dated as of September 16, 2025

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement ("Supplement") provides information about Benjamin Kirby that supplements the brochure of The Millstone Evans Group, LLC (the "Adviser") brochure. You should have received a copy of that brochure. Contact us at 720-728-2801 if you did not receive the Adviser's brochure or if you have any questions about the contents of this Supplement.

Additional information about Benjamin Kirby is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Benjamin Kirby (year of birth 1979) is a Chief Investment Officer of the Adviser.

Mr. Kirby earned a Bachelor of Arts degree in Computer Science from Fort Lewis College in 2000. He also earned a Master of Business Administration degree from Duke University in 2008.

Previously, Mr. Kirby was an employee of Thornburg Investment Management (February 2013 – September 2024).

Mr. Kirby has been a CFA® Charterholder since 2009. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 – Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Kirby has no such required disclosures under this item.

Item 4 – Other Business Activities

- A. Mr. Kirby is not actively engaged in any other investment-related businesses or occupations.
- B. Mr. Kirby is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 – Additional Compensation

Mr. Kirby has no other income or compensation to disclose.

Item 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Byron Wilson, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Wilson at (720) 728-2804.