

Item 1. Cover Page

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Form ADV Part 2A
Firm Client Advisory Brochure CRD 305353
September 2, 2025

Origin Investment Advisory LLC (the “Firm”) is a Delaware-domiciled limited liability company, with principal headquarters in Boston, MA 02111. The Firm is online at <https://useorigin.com>.

This brochure provides information about the qualifications and business practices of the Firm, including our relationship with DriveWealth LLC (“DriveWealth”). If you have any questions about the contents of this brochure, please contact the Firm at thefirm@useorigin.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority. The Firm is an SEC-registered investment adviser, but registration does not imply a certain level of skill or training.

Clients should review both this brochure and DriveWealth's separate risk disclosures before opening an account.

Pursuant to the requirements of 950 Mass. Code Regs. 12.205(8)(a)4, the disciplinary history of the Firm and its representatives can be obtained from the Massachusetts Securities Division upon request. www.adviserinfo.sec.gov. Additional information about the Firm is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2. Material Changes

This section summarizes only material changes made since our last update on March 10, 2025. The following compares the two most recent versions of our Form ADV Part 2A:

1. Enhanced Disclosure of Discretionary Management Process

- The updated brochure (August 14, 2025) includes enhanced and more detailed disclosure around the Firm's discretionary model portfolio management, particularly for the Automated Index Investing (AII, or robo advisory) product.
- The term "Automated Index Investing" or "AII" is now used explicitly; it was not referenced previously. The Firm more clearly outlines its model management process and discretionary authority in the new version.

2. Expanded DriveWealth-Related Risk Disclosures

- The new version includes expanded risk disclosures related to the Firm's exclusive relationship with DriveWealth as its custodian/broker and describes new features, such as the "Origin High Yield Savings Account" as a component offered through DriveWealth's program bank.
- The updated document now directs clients explicitly to review DriveWealth risk disclosures before account opening.

3. Use of AI/Model Hallucination Disclosure

- The new version introduces explicit risk warnings regarding the use of AI systems in financial planning ("Model Hallucination") and sets expectations for the accuracy and limitations of AI-generated outputs. This risk was not disclosed in the prior version.

4. Greater Explanation of Data Aggregation and Client Responsibilities

- There is enhanced disclosure that the Firm collects client financial data from linked accounts using third-party aggregation tools (such as Plaid). Clients are reminded of their responsibility for data completeness and accuracy—this detail was not provided in the previous brochure.

5. Clarification of Ownership Structure

- The updated version provides specific information about the ownership structure of Blend Financial Inc., specifying Matthew Watson's beneficial ownership percentage and

naming minority institutional investors (01 Advisors, General Catalyst, and Founders Fund), which were not previously disclosed at this level of detail.

6. Changes to Service Descriptions and Terminology

- The new version refines and expands service descriptions, including the Origin High Yield Savings Account, budgeting tools, and insurance. It distinguishes non-discretionary from discretionary advice more clearly, particularly as it relates to AII.

7. Fee Proration and Refund Clarification

- The updated brochure clarifies that individual clients billed in advance may continue accessing services after cancellation through the end of the paid period, but prepaid fees are generally not refunded or prorated (except as required by law). This policy is now expressly stated.

No other material changes have been made since the last annual update (March 10, 2025). Clients are encouraged to review the revised Brochure in its entirety for a comprehensive understanding of our services, risks, and disclosures.

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Item 4. Advisory Business

A. Introduction.

The Firm is a Delaware limited liability company formed in November 2023. The Firm is registered as an investment adviser with the U.S. Securities and Exchange Commission (SEC) and serves as the successor registrant to Blend Financial Inc. ("Blend Financial"), which conducted advisory business under the trade name Origin Financial. Blend Financial was formed in January 2018 and registered as an investment adviser with the SEC in January 2021.

Registration status as an Investment Advisor was transferred from Blend Financial to the Firm in November 2023.

The Firm is a wholly owned subsidiary of Blend Financial. The principal owner of Blend Financial is Matthew Watson, who also serves as Chief Executive Officer of both Blend Financial and the Firm. Mr. Watson beneficially owns approximately 18.032% of Blend Financial on a fully diluted basis.

Blend Financial completed a Series B financing round in August 2021, raising approximately \$56 million at a post-money valuation of \$400 million. Other beneficial owners of Blend Financial include:

- Felicis Ventures (10.746%), a venture capital firm with investments across multiple sectors including financial services;
- 01 Advisors, General Catalyst, and Founders Fund, each of which holds a minority equity interest of less than 10%.

The Firm offers advisory services through two delivery models:

- The Direct-to-Consumer Model (“DTC Model”), where Clients engage the Firm directly and pay fees out-of-pocket or via a subscription arrangement.
- The Employer-Sponsored Model (“Employer Model”), under which Clients access the Firm’s services as part of a workplace benefit program. In this model, an employer or other third party may:
 - Pay all fees on behalf of the Client,
 - Share costs with the Client, or
 - Enable the Client to purchase additional services from the Firm at their own expense.

In all cases, Clients are provided with clear disclosures regarding applicable fees, services offered, and any third-party contributions toward the cost of those services. Advisory relationships are always governed by the Firm’s fiduciary duty under the Investment Advisers Act of 1940.

The Firm’s services include both discretionary and non-discretionary investment advisory through a suite of offerings and products:

- **Budgeting and Forecasting Tool & Financial Planning Services** – Through an annual subscription to the application, Clients gain access to certified financial

planners who provide recommendations tailored to each Client's financial profile, investment goals, and risk tolerance.

- **The Origin AI Advisor** – This tool uses a Client's financial data to answer questions and deliver personalized financial advice.
- **Stock Bundles** – Thematic investment options that allow Clients to purchase bundles of stocks grouped by a common industry or characteristic (e.g., in the AI or Cloud sectors). Clients have the ability to reallocate to individual stocks in the Stock Bundles but are only able to purchase or reallocate within the selected Stock Bundle. These are classified as non-discretionary because the Firm does not recommend specific investment strategies for them.
- **Automated Index Investing ("AII"), sometimes referred to as Robo Advisory** – automating portfolio management with hands-off diversified portfolios.
- **Origin High Yield CashAccount** - Origin's cash management account is provided through DriveWealth's program bank that allows you to earn interest on your uninvested cash while maintaining easy access to funds for trading or withdrawals.

Each of these services is described in more detail below.

B. Types of Advisory Services.

The Firm offers both discretionary and non-discretionary financial planning services designed to assist Clients in managing multiple aspects of their financial lives. These services are tailored to each Client's individual goals, financial circumstances, and risk tolerance.

Clients are required to complete a financial questionnaire before certain services can be provided. Two distinct questionnaires are used to generate client risk profiles:

- **AII Risk Profile** must be completed before a Client can implement an AII discretionary strategy.
- **Origin AI Risk Profile** must be completed by a Client before the Origin AI Advisor can deliver personalized and suitable financial advice.

In summary, the Firm provides a comprehensive suite of discretionary and non-discretionary financial planning services, each customized to address the goals and circumstances of every Client. By requiring Clients to complete targeted risk profile questionnaires—AII Risk Profile for discretionary AII portfolio and Origin AI Risk Profile for receiving personalized advice from the Origin AI Advisor—the Firm endeavors to ensure that all recommendations and investment strategies are aligned with the Client's financial objectives and risk tolerance. This structured

approach upholds the Firm's commitment to delivering tailored, responsible, and client-centric financial guidance.

1. Budgeting and Forecasting Tool & Financial Planning

The Firm's Budgeting and Forecasting Tool offers Clients a dynamic and highly personalized approach to financial planning. By integrating with users' real-time financial data via secure third-party aggregation platforms, the tool analyzes spending patterns, assets, liabilities, and income to generate tailored budgets and clear visibility into net worth. Clients can model future financial scenarios—such as major purchases, changes in life circumstances, or retirement planning—and the system projects potential outcomes based on these inputs, supporting goal tracking and cash flow analysis. All forecasts and recommendations leverage a combination of machine learning algorithms and proprietary financial models.. This comprehensive planning suite empowers users to make informed decisions, helping them optimize investments, manage risk, and achieve their long-term financial goals through a seamless, technologically advanced platform.

The Firm also collects Client financial data from linked accounts using secure, third-party aggregation tools (e.g., Plaid). These linked accounts may provide real-time updates on the Client's spending, investments, and other relevant activity. While these data feeds improve accuracy, Clients are responsible for ensuring the completeness and accuracy of any financial data provided and for updating the Firm if there are material changes to their financial situation.

The Firm's financial planning services may include advice and recommendations related to:

- Budgeting and cash flow management
- Investment strategy and portfolio allocation
- Retirement planning
- Insurance and risk management
- Employee benefits and compensation planning
- Debt management
- Estate and tax-related considerations (in consultation with outside professionals)

Financial planning advice is delivered:

- Through the Budgeting and Forecasting tool, or
- By a designated CFP® professional, or
- Through the Origin AI Advisor (described more fully below).

All recommendations made through the above channels are made in a non-discretionary capacity. This means:

- The Firm does not execute any financial planning recommendations without the Client's explicit instruction.
- Clients are under no obligation to act on the advice provided.
- Clients are free to implement recommendations through any third-party provider or financial professional of their choice.

The Firm endeavors to act in the Client's best interest at all times, in compliance with the standards set forth in the SEC's fiduciary duty for investment advisers and applicable Regulation Best Interest (Reg BI) guidance for investment-related recommendations.

DISCLOSURE: "CFP®" and "CERTIFIED FINANCIAL PLANNER™" are certification marks owned by the Certified Financial Planner Board of Standards, Inc. (CFP Board). These marks are awarded to individuals who successfully complete the CFP Board's initial and ongoing certification requirements, including education, examination, experience, and ethical standards.

2. Origin AI Advisor

The Firm also provides advice through an AI-based tool, Origin AI Advisor (hereinafter, "Origin AI"). Origin AI is an AI-powered financial assistant, designed to provide personalized financial insights and guidance based on a Client's complete financial picture. Origin AI allows real time interaction and operates autonomously based on programming developed by the Firm to provide advice consistent with the Firm's investment management philosophy (described in more detail below). The Firm provides ongoing supervision of Origin AI's outputs for consistency with fiduciary standards and may intervene where recommendations are inappropriate.

How Origin AI Works

- Origin AI integrates with linked financial accounts via Plaid or similar providers, consolidating data on spending, investments, net worth, and cash flow.
- Using a combination of generative AI, algorithmic models, and Origin's financial expertise, it delivers real-time recommendations on topics like portfolio diversification, hidden fees, retirement readiness, and debt management.

Key Capabilities

- Offers specific advice on:
 - Asset allocation and portfolio optimization
 - Fee identification

- Retirement projections with location-specific cost-of-living adjustments
- Cash flow analysis, budgeting, and debt planning
- Provides 24/7 availability for financial guidance.
- Generates conversational, personalized insights, not generic tips.

All recommendations are based on heuristic models and assumptions that may not reflect future conditions, market disruptions, and other events. Origin AI may incorporate algorithmic biases or systemic limitations. The Firm has developed policies and procedures designed to mitigate these, including:

- A multi-agent system that orchestrates an ensemble of leading large language models (LLMs) from providers including OpenAI, Anthropic, and Google. A central router directs each query to a specialized agent tuned for a specific domain of financial planning, such as spending, investments, or long-term forecasting, to ensure analysis is context-aware.
- A proprietary compliance gateway (the "EVAL" system) that runs over 138 automated checks on every AI-generated output before it is delivered to a Client. These checks validate the output for numerical and factual accuracy, suitability against the Client's risk profile, adherence to fiduciary standards, inclusion of required disclosures, and privacy protection.
- Integration with real-time market data feeds and retrieval-augmented generation (RAG) technology to ground recommendations in current market conditions and news.
- Ongoing human supervision and oversight from the Firm's Chief Technology Officer and other designated personnel, which includes routine sampling and review of AI-generated advice to ensure alignment with the Firm's investment philosophy and fiduciary duties.
- The maintenance of complete, immutable, end-to-end audit logs for every Client interaction, which are retained for a minimum of seven years for regulatory inspection.

Collaboration with CFP® Professionals

- Origin AI doesn't replace real-world advice. Client's are encouraged to consult with Origin's select list of CERTIFIED FINANCIAL PLANNER® professionals.
- All recommendations, whether from Origin AI or CFP®s, are made with the client's best interest in mind.

Use of the Origin AI Advisor and Suitability Disclosure

In order to access Origin AI Clients must first complete the Firm's Origin AI Risk Profile questionnaire, which collects information required to assess investment suitability in accordance with applicable regulatory standards.

Origin AI Risk Profile gathers details about the Client's:

- Risk tolerance
- Liquidity needs
- Investment time horizon
- Financial objectives
- Other personal and financial circumstances not already imported from linked accounts

Clients may link external financial accounts to the Origin platform through third-party data providers (e.g., Plaid) to automatically share up-to-date information regarding spending, account balances, investments, and other financial activity. However, the Client remains responsible for ensuring that all information provided—whether entered manually or linked electronically—is complete, accurate, and current. The Client must affirmatively confirm the accuracy and completeness of the data provided in Origin AI Risk Profile before receiving personalized advice.

Until Origin AI Risk Profile is completed, the Origin AI will respond to Client inquiries with only general educational, entertainment or informational content and will prompt the Client to complete the questionnaire before proceeding with personalized recommendations.

Once Origin AI Risk Profile is submitted and confirmed, the Origin AI may generate personalized and suitable financial recommendations using:

- The Client's linked financial data
- Responses from Origin AI Risk Profile
- Publicly available financial information
- The Firm's investment philosophy (summarized below), including principles drawn from Modern Portfolio Theory and the Firm's proprietary Model Portfolios

In conclusion, the Firm provides clients with access to a sophisticated, AI-powered financial assistant capable of delivering personalized insights and guidance around the clock. By integrating clients' comprehensive financial data and responses from Origin AI Risk Profile, Origin AI tailors recommendations in key planning areas such as asset allocation, fee identification, and retirement readiness. However, clients are reminded that these recommendations are based on heuristic models and may be subject to inherent algorithmic biases and system limitations. To safeguard client interests and regulatory compliance, the Firm periodically reviews Origin AI's outputs and may intervene when necessary to ensure alignment with fiduciary standards. Clients must complete and confirm the Firm's suitability questionnaire

before receiving personalized advice and are always encouraged to consult with CERTIFIED FINANCIAL PLANNER® professionals for thorough, individualized financial planning. Ultimately, successful use of Origin AI depends on the completeness and accuracy of the information clients provide, and the Firm's commitment to responsible oversight.

Summary of the Firm's Investment Philosophy Statement

The Firm's investment philosophy is grounded in the quantitative rigor of Modern Portfolio Theory (MPT) while being deeply informed by the principles of behavioral economics. We emphasize broad diversification across asset classes to optimize the risk-return tradeoff, constructing portfolios designed to maximize expected returns for a given level of risk. Recognizing that investors are not always perfectly rational, we integrate insights from behavioral finance to account for common biases like loss aversion and mental accounting. This behaviorally-informed approach helps us design durable, goals-based portfolios that clients can adhere to, even during periods of market volatility, by encouraging a long-term perspective.

Our portfolio construction methodology is systematic and evidence-based, incorporating findings from academic asset pricing models. Where appropriate for a client's risk profile, we may introduce modest and strategic tilts toward factors like company size and value, which have been shown to offer long-term risk premiums. This process begins with a comprehensive risk profile assessment that evaluates a client's risk tolerance, capacity, and the risk required to meet their goals. Based on this profile, a rules-based system assigns the client to a strategic asset allocation model, ensuring consistency, fairness, and suitability.

All strategies are implemented with a focus on practical, real-world outcomes and are governed by our fiduciary duty to act in each client's best interest. This includes employing tax-efficient strategies like optimal asset location and tax-loss harvesting to improve after-tax returns. Portfolios are rebalanced using a threshold-based drift approach to control risk rather than relying on arbitrary calendar dates. Furthermore, our advice is tailored to a client's specific life stage, from young accumulators to retirees, ensuring that recommendations evolve with their changing financial priorities. Every recommendation is documented, and our transparent, subscription-based fee model eliminates conflicts of interest, ensuring our guidance remains objective and client-centric.

3. Stock Bundles

The Firm offers access to curated investment groupings referred to as "Stock Bundles." Stock Bundles are constructed using publicly available data sources—including, but not limited to, Form 13F filings submitted by select institutional investment managers—and supplemented by the Firm's proprietary selection methodology.

These Bundles are assembled using a rules-based approach that incorporates criteria such as:

- Minimum market capitalization thresholds (e.g., companies valued above \$10 billion)
- Liquidity and trading volume
- Industry classification and thematic relevance
- Historical performance correlation

Stock Bundles are reviewed at least annually, and may be updated more frequently in response to material changes in underlying data, market conditions, or manager filings. Additional information regarding the construction, maintenance, and methodology of Stock Bundles is available upon request and detailed in the Stock Bundle Disclosure.

Important Limitations: Stock Bundles are offered solely for informational, entertainment and educational purposes and do not constitute personalized investment advice, financial planning, or a recommendation to buy, sell, or hold any individual security. No part of a Stock Bundle offering is intended to reflect the Client's specific investment profile, risk tolerance, or suitability without further individualized analysis.

Client Responsibilities and Use

Stock Bundle purchases are made on a non-discretionary basis—meaning:

- The Client is solely responsible for determining whether to invest in any security.
- The Firm does not exercise investment discretion over Stock Bundle-related securities.
- The Firm does not manage, monitor, or rebalance any individual stock positions purchased by the Client from a Stock Bundle.

The decision to invest in any security listed in a Stock Bundle is at the Client's sole discretion and risk. While the Firm may provide access to data about these Bundles through its platform, it does not offer ongoing advice regarding the appropriateness or performance of the individual securities.

Key Facts About Stock Bundles

- Derived from publicly available sources such as Form 13F filings
- Reflect holdings reported by selected institutional managers
- Assembled using proprietary criteria related to size, liquidity, and sector
- Reviewed and updated at least annually, and more frequently as needed

- Subject to specific risks, limitations, and no performance guarantees
- Detailed methodology and risk disclosures are available upon request

Regulatory Notice

Stock Bundles are not investment advice and should not be construed as a recommendation or endorsement of any specific security. Investing in individual stocks involves risk, including the risk of loss of principal. Past performance is not indicative of future results. The Firm does not accept fiduciary responsibility for Stock Bundle purchases and assumes no liability for Client investment decisions made in reliance on Stock Bundle content.

4. Automated Index Investing

Automated Index Investing (“AII”) is a type of investment strategy that combines index investing with automation to create a simple, hands-off approach to building and managing a diversified portfolio based on Modern Portfolio Theory (“MPT”). Here’s what it involves:

Index Investing:

Index investing means putting money into funds (like ETFs or mutual funds) that aim to track the performance of a specific market index, such as the S&P 500 or Nasdaq 100. These funds provide broad market exposure, low costs, and passive management.

Automation:

The automated aspect refers to the use of technology (typically via a platform or "robo-advisor"), based on Client’s self-identified AII Risk Profile to:

- Automatically select and manage a mix of index-based investments.
- Rebalance the portfolio as needed (e.g., when allocations drift due to market movements).
- Allocate new contributions according to a pre-set strategy.

How It Works for Investors

Based on the Client’s financial situation, investment objectives, and responses to the Firm’s suitability questionnaire (AII Risk Profile), the Firm will recommend an appropriate Model Portfolio. The Head of Financial Planning oversees model compliance and provides detailed reports to the Investment Committee. Upon the Client’s selection of a Model Portfolio, the Firm is granted discretionary authority to invest and trade assets in the Client’s account without obtaining prior approval for each individual transaction. Models may be disabled if they perform outside parameters set by the Investment Committee.

Client assets are held in an account established by the Client with DriveWealth, our exclusive broker-dealer partner. The Firm directs the investment of these assets based on the selected Model Portfolio strategy, which may include mutual funds, ETFs, or other investment products selected to optimize portfolio construction. These selections may change from time to time. DriveWealth provides both execution and custodial services. Clients must review and accept DriveWealth's separate risk disclosures and account agreements.

Model Portfolios are managed on a discretionary basis, meaning the Firm has full authority to implement the investment strategy and make adjustments to the Client's portfolio in accordance with the Model Portfolio guidelines.

Clients may request reasonable investment restrictions by providing written notice to the Firm. However, the Firm reserves the right, in its sole discretion, to determine whether such restrictions are feasible or whether they may materially impair the implementation of the selected investment strategy.

For accounts subject to ERISA or other retirement plan rules, the Firm will act in a fiduciary capacity as required under applicable law and will implement investment decisions consistent with its obligations under ERISA and the Internal Revenue Code.

Clients should be aware that SIPC protection applies to eligible securities and cash in the account in the event of the Custodian's failure, subject to SIPC limits. SIPC coverage does not protect against market losses.

Each Client's account is managed individually and is held at DriveWealth and DriveWealth acts as the custodian of the Client's funds ("Custodian"). Clients are advised to carefully review any fiduciary or custodial limitations applicable to their specific retirement plan or account before engaging in services that use omnibus custody.

Key Benefits:

- Low fees: Because it's passive and technology-driven.
- Diversification: Broad exposure across asset classes, sectors, or regions.
- Ease of use: Suitable for beginners or those who prefer a "set-it-and-forget-it" approach.

5. Origin Financial High Yield Cash Account (HYCA)

The Origin Financial High Yield Cash Account is an FDIC-insured cash management offering made available to users within the Origin application through a bank sweep program administered by DriveWealth, Origin's brokerage and custody partner. Deposits are swept to and held at DriveWealth's program bank, as defined in the DriveWealth Cash Management Program

Disclosure Statement-Bank Sweep (<https://legal.drivewealth.com/cash-management-program-disclosure-statement-bank-sweep>), and are eligible for FDIC insurance subject to applicable limits. This account is not offered or managed by the Firm, and it does not constitute an investment advisory service or product of the Firm. All terms, conditions, and related disclosures are provided by DriveWealth and program banks.

C. Client Investment Objectives and Restrictions.

1. Budgeting and Forecasting & Financial Planning

Except for AII (described more fully in Section 4(B)) the Firm provides personalized, non-discretionary financial planning services designed to align with each Client's financial goals, investment objectives, and overall financial situation. As part of the onboarding process, Clients are required to complete a comprehensive financial questionnaire on the Firm's website (discussed more fully in Section 4(A)). This intake collects key data points including the Client's risk tolerance, time horizon, income and assets, liabilities, liquidity needs, investment goals, and prioritization of those goals. The responses help establish the Client's Investment Profile, which serves as the foundation for subsequent advisory discussions. Note that all non-discretionary financial planning services draw from Origin AI Risk Profile (see Section 4(A)); *provided that*, Clients working with CFP Professionals may receive non-discretionary financial planning without completing the Firm's Risk Profile.

The Client may schedule, at any time, a consultation with a Firm financial advisor—via phone or video conference—for an introductory call or to review and validate the information provided, gather any additional relevant details, and clarify the Client's financial objectives and constraints. Based on this individualized review, the advisor, at the request of the Client, may develop a Client Plan and offer tailored recommendations regarding asset allocation, goal funding strategies, budgeting, debt reduction, insurance needs, retirement planning, and other elements of the Client's financial life. The firm maintains a list of financial advisors, who are periodically reviewed and who are required to maintain the CFP designation.

The Firm does not maintain discretionary authority over financial planning accounts. Non-discretionary Clients retain full control over whether to act on any advice or recommendations provided by the Firm or its software.

All financial planning advice is provided in the Client's best interest, in accordance with the Firm's fiduciary duty under the Investment Advisers Act of 1940. Advice may incorporate outputs from proprietary tools and models, insights from *Origin AI Advisor*, the Firm's artificial intelligence tool, and broadly accepted financial principles such as Modern Portfolio Theory. However, Clients are solely responsible for determining whether and how to implement any recommendation and may do so through any service provider of their choosing.

Automated Index Investing (AII)

The Firm offers discretionary investment management services through its exclusive relationship with DriveWealth a registered broker-dealer and qualified custodian. Client assets are managed in accordance with Model Portfolios developed and maintained by the Firm. The Firm's Head of Financial Planning is responsible for model compliance and provides detailed oversight reports to the Investment Committee. Models may be periodically updated or disabled if they perform outside parameters set by the Investment Committee. Each Client's account is invested based on their risk assessment results, which classify the Client into a predefined risk category—conservative, moderately conservative, moderate, moderately aggressive, or aggressive. These discretionary managed services rely on the information provided in the Client AII Risk Profile questionnaire.

D. Wrap Fee Program

The Firm does not participate in wrap fee programs.

E. Assets Under Management

For its financial planning service, the Firm provides non-discretionary investment advice to its Client. As of July 30, 2025, with respect to its financial planning service, the Firm has no assets under management on a non-discretionary basis.

For Brokerage Services, the Firm manages discretionary client assets through its Model Portfolios, which are implemented by DriveWealth. As of July 30, 2025, the Firm oversees \$2,412,700 in discretionary assets through its Model Portfolios, and \$439,742 in non-discretionary assets.

Item 5. Fees and Compensation

A. Advisory Fees.

All Clients participating in the Direct-to-Consumer (“DTC”) model are required to pay an annual subscription fee as a condition of accessing the Firm's financial planning services and platform features. This subscription fee is established by the Firm and disclosed to Clients during the enrollment process. It ensures that all DTC Clients receive continuous access to the full suite of services offered, including financial planning tools, advisory resources, and any included features or support, for the duration of their active subscription period. The Firm reserves the right to modify these rates upon notice to Clients.

Financial Planning

DTC Model

Under the DTC Model, Clients may purchase a monthly or annual subscription at rates established by the Firm and disclosed during the enrollment process (the “Subscription Fee”). The Firm reserves the right to modify these rates upon notice to Clients. The Subscription Fee will be charged to the payment method designated by the Client during the enrollment process. The Client’s payment method will be charged once each month or year, as applicable, at the beginning of the subscription, and then on the first calendar day of the next month or year, as applicable, thereafter unless and until the Client cancels their subscription. At the time of subscription, Clients will authorize the Firm to electronically charge the provided payment method for the Subscription Fee. Also, the Client will authorize the Firm to electronically credit such payment method in the event of an erroneous debit.

Clients authorize the Firm to charge any payment method associated with the account in case the primary payment method is declined or no longer available. Clients remain responsible for any uncollected amounts, including any fees, charges, and costs associated with collection efforts. If a payment is not successfully settled, due to expiration, insufficient funds, or otherwise, and the Client did not cancel their subscription, then the Firm may suspend access to the services until the Firm has successfully charged a valid payment method.

Under the DTC Model, Clients may also purchase financial planning sessions with a Firm financial advisor (the “Financial Planning Fee”), whether or not they have a monthly or annual subscription. The Financial Planning Fee will be charged to the payment method designated by the Client during the enrollment process. The Client’s payment method will be charged at the point in time when the Client purchases the financial planning session.

Employer Model

Under the Employer Model, the Firm offers a flat Service Fee per month per Client; the Firm calculates the fee amount based on the number of clients as provided by the Client’s employer. The Client’s employer (through a contract with the Firm and/or Blend Financial Inc.) is responsible for this fee. The fee is non-negotiable. The Firm does not charge performance-based fees.

Under the Employer Model, Clients may also have the option to purchase additional services directly from the Firm: (i) a monthly or annual subscription, and/or (ii) financial planning sessions, as detailed above.

Certain end-user Clients who either terminate their employment or whose employer discontinues participation in the subscription program may have the opportunity to continue accessing the Firm’s services under the Direct-to-Consumer (“DTC”) Model by paying fees directly to the Firm. The Firm does not have any affirmative obligation to notify Clients of a change in their

service model or eligibility. It is the Client's responsibility to inquire about, and arrange for, continued access and payment under the DTC Model if desired.

The Service Fee is generally billed to the Client's employer annually upon execution of a contract with the Firm and/or Blend Financial Inc., and then annually thereafter. The Firm does not deduct fees from Clients' assets. In all cases, the Firm provides the employer with a written invoice specifying the fee amount and the time period covered, concurrent with the request for payment of advisory fees. Payment may be made by check, ACH, or wire transfer. Partial-year services are treated as full-year services with no proration or refund; for example, if Clients enroll or terminate in the middle of the contract year, the employer remains responsible for the entire annual fee and no portion is refunded or prorated, although Clients may continue to access services for the remainder of that contract year. The Firm has no affirmative obligation to notify Clients of any change to the employer's billing status or responsibility. It is the Client's responsibility to confirm ongoing eligibility and access to services in the event of any change to the employer's participation or payment arrangements.

Automated Index Investing (AII)

Clients who invest through the AII programs are not charged an annual management fee based on account value by the Firm. However, the mutual funds and ETFs held within AII portfolios may have their own fees—such as sales loads, redemption fees, exchange fees, account fees, management fees, distribution (12b-1) fees, and other operating expenses—as detailed in each fund's prospectus. The total expense ratio reflects the combined annual costs of these fees. In addition, administrative and trading costs may be imposed by DriveWealth, our exclusive broker-dealer, in connection with your account. Clients should review and accept DriveWealth's separate risk disclosures and fee schedules at account opening and be aware that our exclusive relationship with DriveWealth may present certain operational risks.

B. Advance Payment of Fees

Fees can be paid in advance by employer Clients under the Employer Model. Individual Clients are billed monthly or annually, as applicable, in advance. If an individual cancels their service mid-billing cycle, they may continue to access services through the end of the paid period, but prepaid fees are not refunded or prorated, except as otherwise required by applicable law. All terms, including the absence of proration or refund, are fully disclosed in the client agreement and Form ADV.

C. Compensation and Commissions

The Firm does not receive any compensation, commissions, or other economic benefits—either directly or indirectly—from the sale, recommendation, or placement of securities, mutual funds, ETFs, or other investment products. All compensation is received solely from client advisory fees as described herein.

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

The Firm does not charge any fees (to any Client) based on a share of capital gains or capital appreciation of Client assets (also known as performance-based fees). Neither the Firm nor any supervised person accepts such fees from advisory Clients.

Item 7. Types of Clients

The Firm primarily provides investment advisory and financial planning services to individual retail investors through two principal channels:

The Direct-to-Consumer ("DTC") Model: In this model, clients engage the Firm directly and pay for services out-of-pocket, typically through a recurring subscription arrangement.

The Employer-Sponsored Model: Here, clients access the Firm's services as an employee benefit, with fees generally paid by the employer under a service agreement with the Firm.

The Firm does not impose minimum asset requirements for opening or maintaining an account, nor are there minimum investment amounts or account sizes associated with its financial planning services. This makes the Firm's offerings broadly accessible to clients regardless of portfolio size or financial complexity.

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

A. Investment Strategies and Methods of Analysis.

Budgeting and Forecasting Tool and Financial Planning

The Firm delivers non-discretionary financial planning services tailored to each Client's financial profile, risk tolerance, and goals. Advice is generated using data gathered from onboarding questionnaires (Origin AI Risk Profile), secure account linking tools (e.g., Plaid), and consultations with CFP® professionals. Advice may also be informed by proprietary Budgeting and Forecasting Tool.

Financial advice is offered on a non-continuous, point-in-time basis and does not constitute ongoing portfolio monitoring. It is the Client's responsibility to provide updated information and request new advice. Recommendations may address areas such as budgeting, insurance, debt management, investment strategy, retirement planning, and employer equity compensation, without predicting individual security performance.

Origin AI Advisor

Origin AI uses generative AI and algorithmic modeling to offer real-time financial insights based on linked account data, public financial information, and responses to Origin AI Risk Profile.

Outputs may include guidance on fee structures, retirement projections, cash flow management, and portfolio diversification. Clients must confirm the accuracy of their data and understand that AI advice is subject to system limitations and does not replace professional consultation. The Firm periodically reviews AI outputs to ensure fiduciary alignment.

Recommendations generated by the Origin AI Advisor are grounded in the Firm's established investment philosophy, which integrates the quantitative framework of Modern Portfolio Theory (MPT) with principles from behavioral economics and academic asset pricing models. The model operates on several core assumptions, including:

- **Diversification:** The model assumes that spreading investments across various asset classes (e.g., stocks, bonds, real assets) is critical for reducing unsystematic risk and optimizing long-term, risk-adjusted returns.
- **Risk-Return Tradeoff:** The model is built on the principle that higher potential returns are associated with higher levels of risk. Asset allocations are therefore designed along an efficient frontier to maximize expected returns for a Client's specific risk tolerance.
- **Factor-Based Premiums:** The model incorporates findings from academic research, and may recommend strategic tilts toward factors like company size (small-cap) and value, which have historically been associated with higher expected returns as compensation for additional risk.
- **Behavioral Economics:** The model accounts for common investor biases, such as loss aversion, by encouraging a long-term perspective and aligning strategies with a Client's stated goals to promote disciplined financial behavior.

The quality and relevance of the advice depend on the data inputs provided to the model. These include: (1) Client-provided information, such as responses to the Origin AI Risk Profile questionnaire covering risk tolerance, time horizon, and financial goals; (2) financial data from a Client's linked accounts, including assets, liabilities, and transaction history; and (3) real-time market data, economic indicators, and news retrieved from public sources to ground recommendations in current conditions. Projections for future returns, inflation, and other economic variables are based on historical data and statistical modeling (such as Monte Carlo simulations), which are not guarantees of future performance and may not account for all potential market scenarios, especially extreme or unprecedented events.

In addition to the risks outlined in Item 8.B, Clients should be aware of risks inherent to advice generated by AI models. While the Origin AI Advisor is designed to provide human-grade, context-aware financial guidance, its performance is subject to certain inherent limitations. Specific risks include:

- **Algorithmic and Data Bias:** The AI model learns from vast datasets that may contain embedded historical biases. While we've mitigated this risk with training and guardrails, risk that the model could perpetuate these biases in its recommendations will always exist to a certain extent, leading to outcomes that are not optimal for all users (but this is mitigated by the personalized nature of each output and fiduciary-related controls in place).
- **Dependence on Client-Provided Data:** The accuracy of the AI Advisor's output is critically dependent on the accuracy and completeness of the financial information provided by the Client. Incomplete or inaccurate data can lead to unsuitable or flawed recommendations.
- **Model Limitations and "Hallucinations":** Despite the Firm's extensive compliance checks, there remains a risk that the AI may generate factually incorrect information ("hallucinations"). Furthermore, the models are based on historical data and statistical correlations that may not hold true in all future market conditions, particularly during periods of high volatility or structural market shifts.
- **Contextual Interpretation Risk:** Although the AI Advisor is designed to prompt for and incorporate complex personal goals and life events, its understanding is ultimately limited to the data it receives. The model may not fully interpret the qualitative nuances, emotional context, or unstated assumptions behind a Client's circumstances. The Client is responsible for ensuring that all relevant context is provided to the AI Advisor.

Stock Bundles

Stock Bundles are curated, rules-based groupings of equities reflecting common characteristics or themes (e.g., sector leadership, management diversity), sourced from public filings such as Form 13F and selected using proprietary screening criteria. They are reviewed periodically for relevance and accuracy. Clients maintain full discretion over purchases and sales of stocks within a Bundle. The Firm does not monitor or rebalance these holdings, and the Bundles are not personalized recommendations or investment advice.

Automated Index Investing (AII)

The Firm's AII services have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940 ("Rule 3a-4"). Rule 3a-4 provides similarly managed investment programs, such as the AII Services, with a non-exclusive safe harbor from the definition of an investment company.

Through the AII program, the Firm offers discretionary portfolio management using a series of Model Portfolios constructed based on Modern Portfolio Theory. These can range from aggressive to conservative, with options decreasing equity exposure by 10% increments. Portfolios are designed to optimize diversification across asset classes using mutual funds and ETFs. Portfolio selection is based on the Client's AII Risk Profile, capturing time horizon, goals, and risk tolerance.

Oversight is provided by the Firm's Head of Financial Planning, with compliance reviews by the members of the Firm's Investment Committee. Models may be disabled or adjusted based on performance deviations or strategic review. The Firm maintains discretionary authority over AII accounts, and Clients may propose reasonable investment restrictions subject to Firm approval.

Origin High Yield Cash Account (HYCA)

The Origin High Yield Cash Account is a cash management feature offered to Clients via DriveWealth's cash sweep program. It is not an investment advisory product, and the Firm does not manage or exercise discretion over HYCA funds. Deposits are held at program banks and are eligible for FDIC insurance subject to applicable limits. Clients retain full ownership of their HYCA balances and may withdraw or transfer funds at any time, subject to DriveWealth's custodial procedures.

Portfolio Fees

Clients who invest in the AII are not subject to an annual Management Fee of the value of their account. However, underlying funds held in a Model Portfolio may charge their own expense ratios, which are deducted directly from the balance of the funds in the Account. Additionally, certain administrative and trading costs, charged by DriveWealth, are associated with this Account. A schedule of the associated account fees is disclosed to the Client upon opening an Account.

Fractional Shares

The Firm provides Clients with the ability to engage in transactions involving fractional shares of certain U.S. securities ("Fractional Trading"). The availability of securities for Fractional Trading and the execution of orders are subject to change and market conditions. The Firm, through DriveWealth, may execute trades in an agency, principal, or mixed capacity. Whole share components are generally executed on an agency basis, while fractional shares are executed on a principal basis. Mixed capacity execution applies when an order includes both whole and fractional shares, ensuring the fractional share component receives the same price as the whole share component.

When engaging in Fractional Trading, all orders, including those for Fractional Shares, are marked "Not Held." This designation provides the Firm and/or DriveWealth with the time and

price discretion to execute the order without being held to the security's current quote. By submitting an order, Clients authorize the Firm or its agents to "work the order," which may involve seeking execution over a period of time and making decisions about when and how much of the order to execute at a given time.

Fractional Shares may have different rights compared to full share interests. Notably, fractional shares may not be transferable or certificated and may require liquidation prior to transferring, and dividends on fractional shares are credited to Client accounts if they meet the minimum threshold. Clients are treated as the owners of fractional shares for tax purposes. Fractional Trading may not be available under certain market conditions, and fractional shares may be liquidated upon account closure.

B. Material Risks of Investment Strategies and Methods of Analysis

Please see below for an explanation of the various types of risks Clients incur when they invest in a certain type of security or partake in a particular investment strategy:

Market Risk – The price of any security or the value of an entire asset class can decline for a variety of reasons outside of the Firm's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period may cause that Client Account to underperform relative to the overall market.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, options, warrants, variable annuities, interest rate linked products, and mutual funds.

Advisory Risk – There is no guarantee that the Firm's investment advice about particular securities or asset classes will necessarily produce the intended results. The Firm and its representatives are not responsible to any Client for losses unless caused by the Firm's gross negligence or willful misconduct in breach of its fiduciary duty. In no event shall the Firm be liable for any indirect, special, incidental, or consequential damages.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, options, warrants, variable annuities, interest rate linked products, and mutual funds.

Management Risk – The Firm's investment approach in the Model Portfolios may fail to produce the intended results. If the Firm's perception of the performance of a specific asset class is not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

Diversification does not assure or guarantee better performance and cannot eliminate the risk of investment losses.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, options, warrants, variable annuities, interest rate linked products, and mutual funds

Diversification Risk – Investing pursuant to the information contained in one or more Stock Bundles does not result in a diversified portfolio and may result in a lack of diversification across sectors, styles, and other asset classes, which may result in a concentration risk.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, options, warrants, variable annuities, interest rate linked products, and mutual funds.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Securities/investment vehicles prone to this risk include; foreign equities, foreign bonds, foreign ETFs, foreign options, foreign warrants, foreign interest rate linked products, and funds that hold foreign equities and/or bonds.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded

equity securities, and for which market quotations or valuation may be limited or inaccurate. The Firm does not use leveraged or inverse ETFs as part of its portfolio construction. A non-indexed ETF can trade at a price above (“premium”) or below (“discount”) the share’s net asset value. A non-indexed ETF purchased at a premium may ultimately be sold at a discount.

Securities/investment vehicles prone to this risk include; ETFs, foreign ETFs.

Inflation, Currency, and Interest Rate Risks - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor’s future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed-income investments to decline.

Securities and investment vehicles prone to this risk include, but are not limited to, ETFs and mutual funds, bonds.

AI/LLM-Generated Advice Risk – The Firm leverages Origin AI Advisor, a generative artificial intelligence–powered tool designed to deliver personalized financial guidance using Client-linked data, public financial information, and responses to the Firm’s Origin AI Risk Profile questionnaire. While this tool enhances efficiency and responsiveness, there are material risks associated with its use, including:

- **Model Hallucination:** AI systems may generate plausible-sounding but factually incorrect or fabricated outputs, particularly when responding to complex or unusual financial scenarios.
- **Incorrect or Incomplete Analysis:** AI-generated recommendations are based on underlying heuristic models and assumptions that may oversimplify or misinterpret Client inputs or market conditions.
- **Contextual Limitations:** AI does not always account for qualitative or situational factors (e.g., changes in employment, inheritance, or personal risk preferences) unless explicitly provided by the Client and understood by the system.
- **Over-Reliance Risk:** Clients may mistakenly treat AI-generated content as a sole or primary source of investment advice, despite clear disclaimers.
- **Systemic Error Risk:** Software bugs, data integration issues, or algorithmic flaws could lead to flawed or inappropriate outputs.

To mitigate the risks associated with AI-generated advice and manage potential conflicts of interest, the Firm has implemented a multi-layered system of automated and human-led controls designed to ensure all recommendations are made in the Client’s best interest. The Firm’s

primary control is a proprietary, automated compliance gateway (the “EVAL” system) that reviews every AI-generated output before it is delivered to a Client. This system performs over 138 automated checks to validate the output for factual accuracy, suitability against the Client's risk profile, adherence to fiduciary standards, inclusion of required disclosures, and privacy protection. If an output fails a check, it is immediately blocked and regenerated, and the event is logged for review.

This automated system is supplemented by robust human supervision. The Firm's Chief Technology Officer is the designated supervisor of the AI model and is responsible for conducting routine sampling of AI-generated advice to ensure ongoing quality and compliance. Furthermore, a dedicated compliance team receives real-time alerts for any flagged outputs, and advice deemed "high-risk" by specialized testing modules is escalated for review by senior management, including the Chief Compliance Officer. To address conflicts of interest, all Employees are bound by a comprehensive Code of Ethics that prohibits practices such as "front-running" and requires pre-clearance of personal trades. The Firm has also implemented a specific governance policy that forbids engineers from skewing the AI Advisor's recommendations for personal financial gain.

While these controls are designed to ensure recommendations are provided in the Client's best interest, Clients remain responsible for verifying the completeness and accuracy of their financial information and are encouraged to consult with human financial planners before making significant financial decisions.

Technology Risk – Since the Firm utilizes technological tools to help Clients simulate portfolio performance based on hypothetical allocations, Clients should make note of the following risks associated with using an online interface:

A computer-based portfolio simulator may still make incorrect assumptions about a Client's financial situation. There is always a possibility that the simulator may experience technical malfunctions that would cause its recommendations to be inaccurate.

- While the portfolio simulator provides valuable insights, Clients acknowledge and understand that the results of the Firm's computer-based portfolio simulator do not constitute personalized investment advice and should not be relied upon as the sole basis for investment decisions. The simulator is merely a supplemental tool that helps Clients assess their financial situation and evaluate potential investments. Clients should note that the simulator bases its recommendation on the assumption that all the information the Client provided is correct and that there are no other external factors to consider.
- The simulator can only base its output on the input from the Client. As such the simulator's output is only as accurate as the data the Client inputs.
- The output that the simulator generates may not assess all of the Client's particular situation. Special circumstances, qualitative characteristics, and other intangible

components of a Client's personal background that are not captured by the simulator may cause the simulator's assumptions to be incorrect.

Cybersecurity Risk – The Firm depends on its computer and technological systems to provide investment recommendations, reporting, and other services to clients. These systems are vulnerable to information security, operational, and related risks resulting from third-party

cyberattacks and/or other technological malfunctions. Cyber-attacks may involve hackers and other unauthorized individuals gaining access to or misappropriating client information, stealing or corrupting data, releasing confidential information (including confidential client information) without authorization, preventing legitimate users from accessing their information or services through the Firm's website or causing other operational disruptions. Successful cyber-attacks against or technological breakdowns of the Firm or another service provider may adversely affect Clients. For example, cyber-attacks may cause the unauthorized release of client confidential information and may prevent clients from accessing information about their goals. While the Firm maintains industry-standard security systems and business continuity plans intended to prevent or reduce the impact of such cyber-attacks and technological malfunctions, these systems and plans are subject to inherent limitations and, despite our best efforts, may not be successful in preventing or reducing the impact of cyberattacks or technological malfunctions. The Firm does not guarantee the security of Client information or the prevention of unauthorized access.

Clients are highly encouraged to speak with a financial advisor at any time to review their Investment Profile and Client Plan. The Firm also has procedures for reviewing Client accounts, which are outlined in Item 13 of this Firm Brochure.

Item 9. Disciplinary Information

Neither the Firm nor any of its management persons has been involved in any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Accordingly, the Firm has no disciplinary information to disclose.

Item 10. Other Financial Industry Activities and Affiliations

The Firm is a wholly owned subsidiary of Blend Financial Inc., which does business as Origin Financial. Origin Financial is a financial wellness company specializing in employee benefits, including financial planning, debt management, and access to a range of digital financial tools and educational resources.

Origin Financial itself is not a registered broker-dealer or investment adviser. However, as an affiliate, it promotes and distributes the Firm's registered advisory services through its platform. This arrangement may present a potential conflict of interest, as Origin Financial could indirectly

benefit from increased client engagement with the Firm's advisory offerings. The Firm mitigates this potential conflict by maintaining a separate and independent compliance program and by adhering strictly to its fiduciary duty under the Investment Advisers Act of 1940—acting solely in the best interests of its Clients at all times.

Neither the Firm nor any of its employees share Clients' non-public personal information with Blend Financial Inc. (Origin Financial) or any other affiliate, except as expressly permitted by law and as set forth in the Firm's Privacy Policy.

A. Management Persons as Registered Broker-Dealers.

Neither the Firm nor any of its management persons are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. Management Persons as Commodities Traders.

Neither the Firm nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

C. Material Relationships with Related Persons.

Neither the Firm nor any of its management persons have a relationship or arrangement that is material to the Firm's advisory business with any of the entities below:

1. Broker-dealer, municipal securities dealer, government securities dealer or broker,
2. Investment company or other pooled investment vehicle (e.g., mutual fund, private fund, etc.),
3. Another investment adviser or financial advisor,
4. Futures commission merchant, commodity pool operator, or commodity trading advisor,
5. Thrift institution,
6. Accountant or accounting firm,
7. Lawyer or law firm,
8. Pension consultant
9. Real estate broker or dealer,
10. Sponsor or syndicator of limited partnerships.

Clients always have the right to decide whether to purchase investment products or services through the third-party entity that the Firm recommends to Clients, and the Firm makes no warranties or guarantees regarding the performance of any third-party products or services.

D. Recommendations of other Investment Advisers.

The Firm maintains a list of preferred advisors, all of whom are CFP® professionals, for the benefit of its Clients. The Firm does not receive any compensation—directly or indirectly—for referring Clients to other advisors or professionals.

CFP® professionals do not serve as investment adviser representatives of the Firm. If a CFP® professional provides services independently of the Firm, such activities are considered outside business activities, are not supervised by the Firm, and are not covered by the Firm’s fiduciary duty. In such cases, the relationship and scope of services will be clearly disclosed to Clients in advance, in accordance with the Firm’s compliance policies and procedures.

The Firm strives to ensure Clients understand which services are offered under its registered advisory program and which are provided independently by external professionals.

Item 11. Code of Ethics, Participation or Interest in Client Transaction and Personal Trading.

A. Code of Ethics

Every officer, director, employee, and contractor of the Firm (each, an “Employee”) is required to act in an ethical and professional manner at all times. To ensure compliance with this standard, and with applicable provisions of the Investment Advisers Act of 1940 and other relevant laws, the Firm has adopted a comprehensive Code of Ethics (“Code”). This Code specifies and prohibits certain types of transactions that are likely to create, or appear to create, conflicts of interest and establishes reporting requirements, enforcement procedures, and restrictions relating to personal trading by Firm personnel.

The Firm’s Code addresses professional conduct standards, prohibits insider trading, sets forth personal trading policies, and outlines restrictions on gifts and entertainment. The Code also emphasizes our Firm’s fiduciary duties and is grounded in key principles of openness, integrity, honesty, and trust.

The Firm and its related persons may recommend to Clients, or buy or sell for client accounts, securities in which the Firm or related persons have a material financial interest. The Firm and its Employees may also invest in the same securities (or related securities) that we recommend to clients. This practice may create actual or potential conflicts of interest. To mitigate these potential conflicts, the Firm’s Code requires pre-clearance and reporting of personal securities transactions, restricts trading ahead of client accounts (no Employee is permitted to benefit at a

client's expense), and provides for equitable allocation of investment opportunities between Employees and clients.

A copy of the Firm's Code is available to any Client or prospective Client upon request.

B. Conflicts of Interest in Connection with Investment Recommendations or Transactions

The Firm recognizes that conflicts of interest may arise in the ordinary course of providing advisory services. In each case, the Firm determines which factors are relevant to the situation and will resolve such conflicts using its best judgment, though ultimately at its sole discretion. To identify, mitigate, and disclose potential conflicts of interest, the Firm employs several practices, including:

- Maintaining and enforcing a robust Code of Ethics (see, Item 11.A above);
- Requiring Employees annually to complete a comprehensive questionnaire that details their outside activities and any potential conflicts of interest;
- Mandating pre-clearance of outside business activities by Employees (with the exception of participation in bona fide charitable, non-profit, civic, or trade organizations);
- Providing full and fair disclosure of material conflicts of interest and associated risks in this Form ADV.

When a conflict of interest cannot be eliminated, the Firm endeavors to manage, mitigate, or disclose the conflict, in accordance with its fiduciary obligations and applicable law. Ultimately, Clients are encouraged to review these disclosures carefully and to contact the Firm with any questions regarding the nature or resolution of potential conflicts.

C. Employee Investments

Since Firm Employees may also make use of the Firm's advisory services, there is a possibility that Employees may invest in the same securities that the Firm recommends to Clients. To address this potential conflict of interest, Employees receive the same advisory services as any other Client—without preferential pricing, access, information, treatment, or transaction timing. Recommendations to Firm Employees are always made on the basis of the Employee's own financial background, investment objectives, and suitability, and are never influenced by recommendations or transactions for other Clients.

In accordance with the Firm's Code and the Investment Advisers Act of 1940, Employees are expressly prohibited from engaging in "frontrunning," "scalping," or similar practices—that is, they may not buy or sell securities for their own accounts ahead of Client transactions or Firm recommendations, nor may they trade in options, derivatives, or convertible instruments related

to any security considered for Client accounts (“inter-market front-running”). Employees are likewise prohibited from trading any security while knowing that it is being actively considered for Client purchase or sale.

All Employee personal trading is subject to the Firm’s compliance monitoring, including pre-clearance and regular review. Any violation of these policies may result in disciplinary action, up to and including termination. These procedures are designed to ensure the Firm always acts in the best interests of its Clients and meets its fiduciary and regulatory obligations.

D. Investing Personal Money in the Same Securities as Clients

Given that Firm Employees may also utilize the Firm’s advisory services as Clients, there is a possibility that the Firm’s related persons would trade securities for their own accounts at the same time they are recommending the same securities for other Clients’ accounts. Please refer to Item 11(C) for an explanation of how this conflict of interest is addressed.

E. Trading Securities at/around the Same Time as Clients’ Securities.

As discussed above, Employees and related persons are subject to the Firm’s Code. The Firm’s Chief Compliance Officer has granted in the past and may grant in the future, exceptions to the ‘Code of Ethics Personal Trading Restrictions’ and ‘Code of Ethics Personal Trading Preclearance’ requirements outlined above.

F. Cross-Marketing Products

The Firm’s financial advisors may recommend other products and services offered by the Firm and/or Blend Financial Inc. In making such recommendations, financial advisors do not receive any compensation for any such recommendations and remain subject to the Firm’s Code. By virtue of making such recommendations, the interests of the Firm and its financial advisors may conflict with those of its Clients. The Firm will disclose any such conflicts of interest to Clients prior to making such recommendations.

Item 12. Brokerage Practices

A. Selection of Broker Dealer

The Firm operates as a discretionary investment adviser utilizing model portfolios, with DriveWealth serving as the exclusive broker-dealer and custodian for all Client accounts. While the Firm has selected DriveWealth based on factors such as quality of execution, operational efficiency, digital integration, and overall client experience, this exclusive relationship presents certain risks to Clients, including potential limitations on available investment options and execution capabilities. Clients should carefully review DriveWealth's separate risk disclosures and account agreements, as these contain important information about additional risks and limitations specific to DriveWealth's services.

The Firm exclusively uses DriveWealth for all brokerage and custody services as part of its discretionary investment management program. This exclusive arrangement is integral to the Firm's model portfolio implementation strategy but may limit investment options and services available to Clients. Clients should carefully review all fees associated with DriveWealth's services, including transaction costs, custody fees, and cash management solutions. The Firm's ability to execute its investment strategy may be impacted if DriveWealth experiences operational issues, changes its service offerings, or terminates its relationship with the Firm.

B. Research and Client Commission Management (Soft Dollars)

The Firm does not participate in any “soft dollar” arrangements. It does not receive research, brokerage services, or other benefits in exchange for directing Client transactions.

C. Brokerage for Client Referrals

The Firm does not compensate broker-dealers for Client referrals and does not engage in any form of “pay-to-play” or referral-based brokerage compensation arrangements.

D. Directed Brokerage

At this time, the Firm has elected to use DriveWealth as its preferred broker-dealer and custodian for Brokerage Services, based on factors such as execution quality, operational efficiency, platform integration, and digital user experience.

However, Clients retain sole and absolute discretion to select a broker-dealer or custodian of their choosing. While DriveWealth is currently the default provider integrated into the Firm’s platform, the Firm does not require Clients to use DriveWealth and will not restrict Clients from directing brokerage to an alternative provider.

Clients who choose to use a different broker or custodian may not receive the same level of integration or automated functionality, and their experience may differ based on the capabilities of the selected provider.

Clients who direct brokerage to a provider other than DriveWealth should be aware that the Firm’s ability to provide automated investment management, reporting, or rebalancing may be materially limited or unavailable. The costs, execution, and overall client experience may differ significantly, and the Firm will not be responsible for any disparities resulting from the use of an unintegrated broker or custodian.

E. Order Aggregation

The Firm does not aggregate orders because it does not exercise trading authority or place orders on behalf of Clients. As disclosed elsewhere in this Brochure, all discretionary investment management services are provided by DriveWealth, which may aggregate Client trades when

executing transactions across accounts with similar strategies, including those aligned with the Firm's Model Portfolios.

Trade aggregation by DriveWealth, when employed, may allow for more efficient execution, improved pricing, or reduced trading costs for participating Client accounts. The Firm does not control or direct aggregation decisions made by DriveWealth and is not involved in the trade execution process. Where order aggregation is not available, certain trades may result in higher transaction costs or less favorable execution than if aggregation were possible.

Item 13. Review of Accounts

A. Periodic Reviews

The Firm performs regular reviews of both financial planning and discretionary investment management accounts to ensure ongoing alignment with each Client's stated objectives, risk tolerance, and suitability requirements. These reviews are overseen by the Firm's Head of Financial Planning, who is responsible for maintaining the integrity and consistency of all account reviews conducted across the Firm.

HYCA and Stock Bundles

The Firm does not monitor, review, or manage the performance of individual Client holdings in connection with the Origin High Yield Cash Account (HYCA) or Stock Bundles. These offerings are non-discretionary, and the Firm does not have trading authority over Client assets held in these accounts.

Additionally, the Firm does not provide ongoing supervision or portfolio monitoring for accounts held:

- Outside of the Firm's discretionary management platform,
- In third-party custodial arrangements, or
- As part of a third-party discretionary investment program.

The Firm does not have access to sufficient data or authority to provide individualized performance assessments or investment recommendations for such accounts. Clients remain solely responsible for reviewing and monitoring their positions, performance, and asset allocation decisions in HYCA and Stock Bundles.

Clients are encouraged to consult with a qualified financial advisor regarding the appropriateness of such holdings in the context of their broader financial goals.

Financial Planning Accounts

Non-discretionary financial planning services—including those accessed via the Budgeting and Forecasting Tool and Origin AI Advisor—are reviewed periodically to confirm that their outputs remain reasonably aligned with the generic risk profiles established at account setup (e.g., conservative, moderate, aggressive). These profiles are determined based on responses to the Firm’s onboarding questionnaires and are not updated unless explicitly revised by the Client.

The Firm does not provide individualized oversight or monitoring of these tools beyond periodic validation that their outputs remain directionally consistent with the applicable risk profile category. Clients are solely responsible for updating their financial data and initiating reviews following any material changes in their financial circumstances.

Services delivered by CERTIFIED FINANCIAL PLANNER™ professionals are provided by third-party advisors and are subject to the independent oversight and professional judgment of those CFP® professionals. These individuals are not supervised by the Firm, and their services do not constitute continuous monitoring by the Firm.

While Clients retain continuous access to the Firm’s financial planning tools and resources, any advice provided is offered on a **non-continuous, point-in-time basis** and does not constitute ongoing account supervision or portfolio monitoring unless expressly agreed to in writing.

AII (Automated Index Investing)

The Firm’s Head of Financial Planning, in coordination with the Investment Committee is responsible for monitoring, reviewing, and updating all model portfolios, whether maintained internally or provided by third-party vendors. Models may be disabled, suspended, or updated when performance deviates from established parameters, or at the discretion of the Head of Financial Planning and Investment Committee. Ongoing suitability of portfolio allocations,

- Client adherence to their AII Risk Profile,
- Model compliance and optimization,
- Rebalancing needs or deviations from intended allocations,
- Performance relative to expectations or thresholds, and
- Selection or replacement of underlying securities (e.g., ETFs or mutual funds).

Model Portfolios may be updated, suspended, or discontinued at the discretion of the Head of Financial Planning. Any material changes are implemented through the Firm’s discretionary authority and executed via DriveWealth or another approved custodian.

Third-Party Tools and Providers

Third-party providers, and other data or model vendors, may also update their tools, algorithms, or inputs periodically. The Firm evaluates these updates to ensure consistency with its fiduciary obligations. The Firm reserves the exclusive right to continue, suspend, or terminate its use of any third-party data source, technology vendor, or custodial platform, at its sole discretion and without prior notice to Clients, subject to applicable law.

Reserved Rights

The Firm's right to update, suspend, or terminate advice, models, third-party data providers, or the broker-dealer/custodian is exclusive and may be exercised at any time without Client consent. The Firm shall not be liable for any loss or change in service resulting from the exercise of these rights, except as may be required by applicable law. All changes are made in accordance with the Firm's fiduciary duties and compliance policies, and Clients will be notified of material updates in accordance with the Firm's standard communication practices.

B. Intermittent Review Factors

In addition to scheduled reviews, the Firm may perform additional account evaluations triggered by substantial market fluctuations, significant economic or political events, or any material change in a Client's financial circumstances—such as retirement, termination of employment, relocation, inheritance, or other major life events. Intermittent reviews may also be initiated in response to changes in the Firm's models or third-party data sources. If a conflict arises between any investment strategy and a Client's stated objectives, the Firm contacts the Client to discuss and determine appropriate next steps.

C. Client Reports

The Firm provides all Clients with continuous access to their profile via the Firm's website, where Clients can access their financial profile and investment recommendations. The written reports include the account's valuation and performance. The reports also include a summary of the holdings in a Client's portfolio, along with an analysis of the portfolio's progress in meeting the Client's investment objectives. Clients will also receive periodic email communications describing portfolio performance and product features.

Item 14 – Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties

The Firm does not receive economic benefits from third parties for providing investment advice to its Clients, except in the context of the Employer Model, in which a Client's employer may subsidize or pay advisory fees on the Client's behalf. In such cases, Clients do not pay higher fees as a result of the employer's involvement.

The Firm may also license access to its proprietary technology platform to non-advisory personnel or partners in exchange for a platform licensing fee. These arrangements do not influence the investment advice provided to Clients.

B. Compensation to Non Advisory Personnel for Client Referrals

Client Referrals and Promoter Compensation

The Firm may enter into agreements with promoters, brand ambassadors, or other third-party solicitors who refer prospective Clients to the Firm. These arrangements are conducted in compliance with Rule 206(4)-1 of the Investment Advisers Act of 1940 (the “Marketing Rule”) and applicable state regulations, including Massachusetts securities laws.

- Each promoter operates under a written Promoter Agreement that outlines the terms of compensation.
- Compensation may be based on the number of Clients referred or on assets under advisement attributable to the referral.
- All promoters must be appropriately registered or exempt under applicable federal or state laws.
- Prospective Clients referred by a promoter will receive written disclosure at or before the time of entering into an advisory agreement, including:
 - The fact that a referral was made;
 - The compensation arrangement involved;
 - Any material conflicts of interest; and
 - The nature of the relationship between the promoter and the Firm.

Clients will not be charged any additional fees as a result of being referred to the Firm by a promoter.

Social Media Promotions and Testimonials

The Firm may engage in social media-based advertising and promotional campaigns, including the use of testimonials, endorsements, and referral incentives. These campaigns may be conducted by:

- Clients,
- Paid influencers,
- Affiliates,

- Or unaffiliated third parties.

Where required, all such communications will include clear and prominent disclosures in accordance with the SEC Marketing Rule, including:

- Whether the promoter or endorser is a Client;
- Whether they are compensated;
- Any potential conflicts of interest.

The Firm may post or share testimonials or endorsements on its website, mobile application, or social media platforms (e.g., LinkedIn, Instagram, YouTube, or TikTok) only in compliance with all applicable federal and state advertising regulations.

Incentives and Promotional Campaigns

From time to time, the Firm may offer promotional incentives to encourage new Client engagement. These campaigns may include:

- Cash bonuses;
- Fee waivers;
- Interest rate enhancements;
- Or other benefits for opening an account, maintaining a balance, or referring new Clients.

These promotions may create an incentive for existing Clients or third parties to refer others to the Firm. In some cases, they may also create a conflict of interest for Clients to maintain assets at certain levels in order to qualify for an incentive. All promotional terms will be disclosed clearly and will not affect the impartiality of advice provided by the Firm.

The Firm may also engage with digital advertisers or marketing affiliates under commercial agreements. These entities are compensated for advertising services but are not involved in the provision of investment advice. The Firm's Model Portfolios are actively monitored and may be modified based on market conditions, fund performance, or changes in investment strategy. Any changes to underlying fund holdings may result in additional transaction costs and potential tax consequences for Clients. The total cost of investing includes both direct fees charged by the Firm and indirect expenses such as mutual fund management fees, administrative costs, and distribution fees.

Item 15. Custody

Financial Planning

The Firm does not maintain custody of Client funds or securities in connection with its financial planning services. All Client assets remain under the control of the Client and are held by a qualified custodian selected by the Client. The Firm does not accept or process any Client deposits, withdrawals, or asset transfers and does not have authority to access Client funds, except as permitted for deducting advisory fees, where applicable and in compliance with SEC Rule 206(4)-2 (the “Custody Rule”).

Brokerage Services and Custody

For Clients engaging in discretionary investment management services through the Firm’s platform, all brokerage and custodial services are provided by DriveWealth, a third-party qualified custodian and FINRA-member broker-dealer. Clients must review and accept DriveWealth's separate risk disclosures and account agreements. The Firm selects mutual funds, ETFs, and other securities for its Model Portfolios based on various factors including costs, performance, and portfolio optimization objectives. Changes to fund selections may trigger additional costs including sales loads, redemption fees, exchange fees, and other expenses. DriveWealth is responsible for:

- Executing all authorized transactions,
- Safeguarding Client assets, and
- Delivering periodic account statements directly to Clients.

DriveWealth sends official account statements at least quarterly, and monthly when activity occurs, in accordance with SEC requirements. Clients should carefully review these custodial statements upon receipt and promptly report any discrepancies.

The Firm provides Clients with portfolio reports, performance summaries, and other account-related information via its website or Client portal. These materials detail portfolio holdings, transactions, and associated fees including management fees, fund expenses, and trading costs. Clients should carefully review all fund-related expenses including sales loads, redemption fees, 12b-1 fees, and expense ratios before approving any model changes. Clients are encouraged to consult with a financial advisor regarding the tax and cost implications of any significant portfolio modifications. Clients should rely on the official account statements provided by DriveWealth for accurate and complete account information.

Clients are encouraged to compare the Firm’s website-based summaries with the official custodial statements provided by DriveWealth and to contact the Firm or DriveWealth with any concerns or discrepancies.

Item 16. Investment Discretion

The Firm provides discretionary investment management services to Clients through the use of proprietary model portfolios implemented on the Firm's platform. Prior to engaging in any discretionary investment management, each Client is required to complete the Firm's AII Risk Profile questionnaire. This risk profile assesses the Client's financial background, investment objectives, risk tolerance, liquidity needs, investment time horizon, and other relevant factors. The information gathered enables the Firm to determine the suitability of discretionary model portfolio investments and to assign each Client to the most appropriate investment strategy.

Upon successful completion and review of AII Risk Profile, the Firm is granted discretionary authority to manage Client assets in accordance with the selected model portfolio. This discretionary authority allows the Firm to determine, without prior consultation with the Client, the specific securities to be bought or sold, the timing and amounts of transactions, asset allocation decisions, and the selection or replacement of underlying mutual funds, ETFs, or other investment products. These decisions are made consistent with the parameters set forth in the Client's completed risk profile and any stated investment guidelines or restrictions.

Discretionary management is implemented exclusively through the Firm's relationship with DriveWealth, LLC, the Firm's designated broker-dealer and qualified custodian. DriveWealth is responsible for the execution, custody, and settlement of all transactions directed by the Firm, including periodic portfolio rebalancing and implementation of model changes. The Firm's Head of Financial Planning, in consultation with the Firm's Investment Committee—comprised of the Chief Compliance Officer (CCO), Chief Technology Officer (CTO), Head of Financial Planning, and senior product and engineering staff—is responsible for ongoing monitoring of model compliance and portfolio optimization. Models may be modified, updated, or disabled at the Firm's sole discretion based on performance parameters, changes in market conditions, or other material considerations.

Where Clients elect to utilize additional advisory features—such as the Firm's AI-powered planning and budgeting tools—each Client must complete Origin AI Risk Profile. This risk profile is used to further assess the Client's personal financial situation, investment preferences, and suitability for personalized financial planning recommendations provided via the Firm's technology platform. Access to these features is contingent upon submission and review of the relevant risk profile information to ensure all advice remains suitable and in the Client's best interest.

Clients are encouraged to review and understand the scope of the Firm's discretionary authority and to promptly notify the Firm of any material changes to their financial circumstances or objectives. Discretionary authority is granted to the Firm as documented in the Client's advisory agreement and account opening documentation with DriveWealth. Clients retain the right to

impose reasonable investment restrictions or revoke the Firm's discretionary authority at any time, as set forth in their advisory agreement.

Material risks associated with the Firm's exclusive relationship with DriveWealth, limitations in available investment options, and potential operational disruptions are described elsewhere in this brochure. Clients should carefully review DriveWealth's separate account and risk disclosures as part of their onboarding process.

Item 17. Voting Client Securities

The Firm does not have and will not accept authority to vote proxies on behalf of Clients for any services it provides. The Firm does not engage in proxy voting, and will not advise Clients or provide guidance on how to vote proxies for any securities held in their accounts. The Firm also does not collect or transmit proxy voting instructions from Clients to any issuer or custodian.

For Clients receiving financial planning services, all proxy materials and corporate actions related to Client securities will be sent directly to the Client by the account custodian or transfer agent. Clients should direct any questions regarding proxy materials, shareholder solicitations, or corporate actions to their custodian or the issuing company.

For Clients participating in AII through the Firm's platform, investment accounts are typically comprised of exchange-traded funds (ETFs) and other pooled investment vehicles. As an investor in an ETF, the Client does not have direct voting rights to the underlying portfolio securities; instead, the ETF provider (such as BlackRock, Vanguard, or State Street) holds the legal title to those shares and votes all proxies on behalf of the fund's shareholders according to its published proxy voting policies. Individual ETF investors generally cannot vote proxies on underlying companies, although some large fund providers are beginning to offer limited proxy voting choice programs for certain shareholders. Any shareholder communications, proxy statements, or vote summaries relating to fund-level actions will be sent to Clients by DriveWealth the qualified custodian, or directly by the fund issuer, as applicable.

Clients with questions about proxy voting or shareholder materials should contact their custodian (DriveWealth) or the relevant fund company. The Firm neither implements voting instructions nor provides advice on specific proxy voting matters.

Item 18. Financial Information

The Firm does not require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance. Accordingly, the Firm is not required to include a balance sheet with this Brochure.

The Firm is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to Clients.

The Firm has never been the subject of a bankruptcy petition.

In addition, the Firm maintains operating and regulatory capital in accordance with applicable legal requirements, and regularly monitors its financial condition as part of its ongoing compliance program. If at any time a material adverse financial condition arises that could reasonably be expected to impact the Firm's ability to fulfill its obligations to Clients, the Firm will promptly update this Brochure and provide appropriate notice as required by law or regulation.