Prosperity Wealth Planning LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Prosperity Wealth Planning LLC. If you have any questions about the contents of this brochure, please contact us at 877-878-7860 or by email at: clientservices@prosperitywealthplanning.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Prosperity Wealth Planning LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Prosperity Wealth Planning LLC's CRD number is: 315163.

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Registration as an investment adviser does not imply a certain level of skill or training.
Version Date: November 19, 2026

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Prosperity Wealth Planning LLC on 03/23/2026 are described below. Material changes relate to Prosperity Wealth Planning LLC's policies, practices or conflicts of interests only.

- Prosperity Wealth Planning LLC has renamed its legacy investment guidance service to the Next Generation Preparation program. The Next Generation Preparation service includes a financial and investment review, access to educational resources, and one annual review meeting each subsequent year, and generally provided at no cost for the adult children of clients with over $2,000,000 in assets under management. Hourly and fixed fees may apply for additional meetings and separate comprehensive financial plans, respectively. (Items 4 & 5)
- Prosperity Wealth Planning, LLC has included ACH and credit card as additional methods of payment for its financial planning fees. (Item 5)
- Prosperity Wealth Planning LLC revised its Family Legacy Planning Session offering. Rather than charging a separate fixed fee, the Firm may offer Family Legacy Planning Sessions to certain clients, at its discretion, at no additional charge. (Items 4 & 5)
- Prosperity Wealth Planning LLC revised its hourly financial planning offering. Under the firm's current financial planning agreement, hourly financial planning services are available only following the completion of a comprehensive financial plan, and apply to follow-up work such as plan reviews, updates, and revisions. Hourly rates are unchanged. Clients under previously executed financial planning agreements continue to receive services under the terms of those agreements. (Items 4 & 5)
- Prosperity Wealth Planning LLC no longer offers divorce planning services. References to divorce planning as a financial planning service and the related hourly fee of $325 to $450 have been removed. (Items 4 & 5)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Prosperity Wealth Planning LLC (hereinafter "PWP") is a Limited Liability Company organized in the State of California. The firm was formed in March 2019, and the principal owner is Carolanne M Chavanne.

B. Types of Advisory Services

Portfolio Management Services

PWP offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. PWP creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

PWP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PWP will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

PWP seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of PWP's economic, investment or other financial interests. To meet its fiduciary obligations, PWP attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, PWP's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is PWP's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include but are not limited to: retirement planning; estate planning; insurance planning; family legacy planning; and next generation preparation.

For family legacy planning, services include a family legacy planning session to help clients clarify their legacy goals, prepare loved ones, and ensure their estate plans reflect their values. For next generation preparation, services include asset allocation recommendations, financial education classes and an annual review meeting.

Comprehensive financial planning is provided for a fixed fee. Hourly financial planning services are available only following the completion of a comprehensive financial plan, at the discretion of the firm, for follow-up work such as plan reviews, updates, and revisions. Clients under previously executed financial planning agreements may continue to receive hourly financial planning services under the terms of those agreements.

PWP is not a licensed attorney and will be giving no legal advice, creating no legal documents, and is not acting in the capacity of an attorney as part of engagements involving estate planning review. Engaging PWP for financial planning services does not provide PWP the authority to place trades. The client will be responsible for implementing the recommendations provided to the client by PWP.

Educational Seminars/Workshops

PWP provides periodic educational seminars, workshops and podcasts to clients on various financial planning topics.

Services Limited to Specific Types of Investments

PWP generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities. PWP may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;

- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

PWP offers the same suite of services to all clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent PWP from properly servicing the client account, or if the restrictions would require PWP to deviate from its standard suite of services, PWP reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. PWP does not participate in any wrap fee programs.

E. Assets Under Management

PWP has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
$ 269,224,678.00	$ 0.00	December 31, 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
$2,000,000 +	.50%
$1,000,000 – 1,999,999	.75%
$500,000 - $999,999	1.00%
$250,000 – 499,999	1.25%
$0 - $249,999	2.00%

The advisory fee is calculated using the value of the assets in the account on the last business day of the prior billing period.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of PWP's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Fees on assets invested in American Funds 529 Plan accounts are deducted in arrears from the client's account by the American Funds Service Company at the end of each quarterly period ending on the last business day of February, May, August, and November. Fees shall be the product of (i) the average daily net asset value of client assets invested in shares of the funds during the quarter; (ii) the number of days in the quarter; and (iii) the annual rate divided by the number of days in the year.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for comprehensive financial planning generally ranges from $1,500 to $3,500, depending on the complexity of the plan.

Should you decide to also have PWP manage your investments after reviewing your financial plan, the financial planning fee is waived, and the household will receive our Investment Advisory Contract.

Following the completion of a comprehensive financial plan, financial planning services are available at an hourly rate between $325 and $500 per hour, depending on the complexity of the need, at the discretion of the firm. This hourly rate applies to follow-up work such as plan reviews, updates, and revisions after the initial financial plan has been completed.

For Next Generation Preparation clients, financial planning services include a financial and investment review, access to educational resources, and one annual review meeting each subsequent year. These services are generally provided at no cost for the adult children of our current clients with over $2,000,000 in assets under management, subject to the firm's discretion. Additional meetings requested beyond the initial and annual review meeting may be billed at a fixed rate of $150 per hour. Brief meetings under 15 minutes are generally not charged. If a separate comprehensive financial plan is requested outside the scope of the onboarding review, a fixed fee of up to $750 may apply.

From time to time, the Firm offers Family Legacy Planning Sessions to certain clients at its discretion. When offered, these services are provided at no additional charge.

Hourly Fees – Financial Planning (Legacy Agreements)

For clients under previously executed financial planning agreements, the negotiated hourly fee

for financial planning services is between $325 and $500 depending on complexity

Clients may terminate the agreement without penalty, for full refund of PWP's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Educational Seminars/Workshops Fees

PWP does not charge a fee for their educational content.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client. Fees are paid in advance or in arrears (in arrears when processing American Funds 529 fees).

Payment of Financial Planning Fees

Financial planning fees are paid via check, wire, ACH, or credit card.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by PWP. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

PWP collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or by deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation for the Sale of Securities to Clients

Neither PWP nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

PWP does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

PWP generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Corporations or Other Businesses

PWP generally requires a household minimum of $1,000,000 for any of PWP's services. This minimum is negotiable.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

PWP's methods of analysis include Fundamental analysis, Modern portfolio theory, Quantitative analysis and technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

PWP uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

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

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. Regarding trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the

relevant indexes. Regarding liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another, and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services.

Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

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

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither PWP nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither PWP nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business

and Possible Conflicts of Interests

Neither PWP nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

PWP does not utilize nor select third-party investment advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

PWP has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. PWP's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

PWP does not recommend that clients buy or sell any security in which a related person to PWP or PWP has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of PWP may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of PWP to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. PWP will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of PWP may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of PWP to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, PWP will never engage in trading that operates to the client's disadvantage if representatives of PWP buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on PWP's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and PWP may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in PWP's research efforts. PWP will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

PWP recommends Charles Schwab & Co., Inc. Advisor Services.

1. Research and Other Soft-Dollar Benefits

While PWP has no formal soft dollars program in which soft dollars are used to pay for third party services, PWP may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). PWP may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any client will benefit from soft dollar research, whether or not the client's transactions paid for it, and PWP does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. PWP benefits by not having to produce or pay for the research, products or services, and PWP will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that PWP' acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

PWP receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

PWP will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

If PWP buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, PWP would place an aggregate order with the broker on behalf of all such clients to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. PWP would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with PWP's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for PWP's advisory services provided on an ongoing basis are reviewed at least monthly by Carolanne M Chavanne, Founder and Chief Compliance Officer, regarding clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Carolanne M Chavanne, Founder & Chief Compliance Officer. Financial planning clients are provided a financial plan with their financial situation. After the presentation of the plan, PWP may provide updates to existing plans annually at no additional cost.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial planning, PWP's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of PWP's advisory services will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

With respect to Schwab, PWP receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For PWP client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to PWP other products and services that benefit PWP but may not benefit its clients' accounts. These benefits may include national, regional or PWP specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of employees of PWP by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist PWP in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of PWP's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of PWP's accounts. Schwab Advisor Services also makes available to PWP other services intended to help PWP manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice

management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to PWP by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to PWP. PWP is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non – Advisory Personnel for Client Referrals

PWP does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, PWP will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Custody is also disclosed in Form ADV because PWP has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, PWP will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

PWP provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, PWP generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

PWP will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

PWP neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither PWP nor its management has any financial condition that is likely to reasonably impair PWP's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

PWP has not been the subject of a bankruptcy petition in the last ten years.