



STEIGERWALD,
GORDON & KOCH
WEALTH ADVISORS

Uniform Application for
Investment Advisor Registration

Steigerwald, Gordon & Koch Inc.

SEC File Number: 801 – 55694

ADV Part 2A, Brochure

Dated: March 19, 2026

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This Brochure provides information about the qualifications and business practices of Steigerwald, Gordon & Koch Inc. If you have any questions about the contents of this Brochure, please contact us at (703) 777-8826 or Jennifer@SGKWealthAdvisors.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 Steigerwald, Gordon & Koch Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

References herein to Steigerwald, Gordon & Koch Inc. as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2 Material Changes

There have been material changes made to Steigerwald, Gordon & Koch Inc.'s ADV Part 2A Brochure since its March 19, 2025 Annual Amendment filing.

- Jennifer Wiggins has been named Chief Compliance Officer, effective June 25, 2025.
- Effective June 13, 2025, SGK no longer participates in the Schwab Advisor Network referral program.

The Firm has made disclosure changes, enhancements and additions at Item 4 below.

ANY QUESTIONS: Steigerwald, Gordon & Koch Inc.'s Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that an existing or prospective client may have about this Brochure.

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Item 4 Advisory Business

- A. Steigerwald, Gordon & Koch Inc. (“SGK”) is a Virginia corporation formed on June 17, 1996. SGK became registered as an investment adviser in June 1996. John S. Steigerwald is SGK’s principal owner. SGK’s officers are John S. Steigerwald, Chief Executive Officer; Jeffrey A. Gordon, President; and Darren A. Koch, Vice President.
- B. As discussed below, SGK offers to its clients (generally: individuals, high net worth individuals, business entities, trusts, estates and charitable organizations, etc.) investment advisory services, and, to the extent specifically requested by a client, financial planning and related consulting services.

INVESTMENT ADVISORY SERVICES

Clients can engage SGK to provide discretionary investment advisory services on a fee-only basis. SGK’s annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under SGK’s management. Before engaging SGK to provide investment advisory services, clients are required to enter into an Investment Advisory Agreement with SGK setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

SGK’s annual investment advisory fee compensates for investment advisory services, and, to the extent specifically requested by the client, financial planning and consulting services. While SGK believes that it is important for the client to address financial planning issues on an ongoing basis, SGK’s fee, as set forth at Item 5 below, will remain the same regardless of whether the client determines to address those issues with SGK. If SGK determines in its sole discretion that the client requires extraordinary planning and/or consultation services, SGK may seek to charge for those services under the terms and conditions of a stand-alone Financial Planning and Consulting Agreement.

Before SGK provides such investment advisory services, an investment adviser representative will coordinate with each client to develop their investment objectives. Then, SGK will allocate client investment assets consistent with the designated investment objectives. Once allocated, SGK provides ongoing monitoring and review of account performance and asset allocation as compared to client investment objectives and may execute account transactions based on those reviews or other triggering events.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent requested by a client, SGK may determine to provide financial planning and/or related consulting services regarding matters such as tax and estate planning, insurance, etc. on a stand-alone basis per the terms and conditions of a separate written agreement and fee, the fee for which shall generally be based upon the individual providing the service and the scope of the services to be provided. Prior to engaging SGK to provide planning or consulting services, clients are generally required to enter into a Financial Planning and Consulting Agreement with SGK setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to SGK commencing services.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. To the extent requested by a client, SGK may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. as part of the investment advisory engagement or according to the terms and conditions of a stand-alone Financial Planning and Consulting Agreement. SGK does not serve as an attorney, accountant, or insurance agency, and no portion of its services should be construed as legal, accounting, or insurance implementation services. Accordingly, SGK does not prepare estate planning documents, tax returns or sell insurance products. Unless specifically agreed in writing, neither SGK nor its representatives are responsible to implement any financial plans or financial planning advice; provide ongoing financial planning services; or provide ongoing monitoring of financial plans or financial planning advice. The client is solely responsible to revisit the financial plan or financial planning advice with SGK, if desired. SGK's financial planning and consulting services are completed upon communicating its recommendations to the client. Upon client request, SGK may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.). Clients are under no obligation to engage the services of any recommended professional, who shall be solely responsible for the quality and competency of the services they provide. If the client engages any unaffiliated recommended professional, and a dispute arises related to the engagement, the client should seek recourse exclusively from and against the engaged professional.

Retirement Plan Rollovers – No Obligation / Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If SGK recommends that a client roll over their retirement plan assets into an account to be managed by SGK, such a recommendation creates a conflict of interest if SGK will earn new (or increase its current) compensation an advisory fee on the rolled over assets. Whether SGK provides a recommendation as to whether a client should engage in a rollover or not, SGK is acting as a fiduciary 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. No client is under any obligation to roll over plan assets to an IRA managed by SGK or to engage SGK to monitor and/or manage the account while maintained at the client's employer's plan or an existing IRA. SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

Portfolio Activity. SGK has a fiduciary duty to provide services consistent with the client's best interest. SGK will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when SGK determines that changes to a client's portfolio are unnecessary. Clients remain subject to the fees described in Item

5 below during periods of portfolio inactivity. Of course, as indicated below, there can be no assurance that investment decisions made by SGK will be profitable or equal any specific performance level(s).

Other Assets. A client may:

- hold securities that were purchased at the request of the client or acquired prior to the client's engagement of SGK. Generally, with potential exceptions, SGK does not/would not recommend nor follow such securities, and absent mitigating tax consequences or client direction to the contrary, would prefer to liquidate such securities. **Please Note:** If/when liquidated, it should not be assumed that the replacement securities purchased by SGK will outperform the liquidated positions. To the contrary, different types of investments involve varying degrees of risk, and there can be no assurance that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by SGK) will be profitable or equal any specific performance level(s). In addition, there may be other securities and/or accounts owned by the client for which SGK does not maintain custodian access and/or trading authority; and,
- hold other securities and/or own accounts for which SGK does not maintain custodian access and/or trading authority.

Corresponding Services/Fees. When agreed to by SGK, SGK shall: (1) remain available to discuss these securities/accounts on an ongoing basis at the request of the client; (2) monitor these securities/accounts on a regular basis, including, where applicable, rebalancing with client consent; (3) shall generally consider these securities as part of the client's overall asset allocation; and, (4) report on such securities/accounts as part of regular reports that may be provided by SGK; and, (5) include the market value of all such securities for purposes of calculating advisory fee.

Cash Positions. SGK continues to treat cash as an asset class. As such, unless determined to the contrary by SGK, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating SGK's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), SGK may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, SGK's advisory fee could exceed the interest paid by the client's money market fund.

Cash Sweep Accounts. Account custodians generally require that cash proceeds from account transactions or cash deposits be swept into and/or initially maintained in the custodian's sweep account. The yield on the sweep account is generally lower than those available in money market accounts. To help mitigate this issue, SGK shall generally purchase a higher yielding money market fund available on the custodian's platform with cash proceeds or deposits, unless SGK reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to, the amount of dispersion between the sweep account and a money market fund, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account. **ANY QUESTIONS:** SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that a client or prospective client

may have regarding the above.

Please Note: Socially Responsible (ESG) Investing Limitations. *Socially Responsible Investing* involves the incorporation of **Environmental, Social and Governance** (“ESG”) considerations into the investment due diligence process. ESG investing incorporates a set of criteria/factors used in evaluating potential investments: Environmental (i.e., considers how a company safeguards the environment); Social (i.e., the manner in which a company manages relationships with its employees, customers, and the communities in which it operates); and Governance (i.e., company management considerations). The number of companies that meet an acceptable ESG mandate can be limited when compared to those that do not, and could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by SGK), there can be no assurance that investment in ESG securities or funds will be profitable, or prove successful. SGK does not maintain or advocate an ESG investment strategy, but will seek to employ ESG if directed by a client to do so. If implemented, SGK shall rely upon the assessments undertaken by the unaffiliated mutual fund, exchange traded fund or separate account manager to determine that the fund’s or portfolio’s underlying company securities meet a socially responsible mandate.

WE DON’T RECOMMEND Cryptocurrency: For clients who have advised SGK that they want to consider a potential investment in cryptocurrencies, including Bitcoin (“together, Crypto”) SGK, will advise the client to consider a potential investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. **Please Note:** SGK considers such an investment to be **speculative**. **Please Also Note:** Clients who purchase Crypto must be prepared for potential **liquidity constraints, extreme price volatility, regulatory risk, technology risk custody risk, and complete loss of principal.**

Client Obligations. In performing its services, SGK will not be required to verify any information received from the client or from other designated professionals who provide services to the client, and SGK is expressly authorized to rely thereon. Clients maintain responsibility to promptly notify SGK if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising SGK’s previous recommendations or services.

Reporting Services. SGK can also provide account reporting services, which can incorporate client investment assets that are not part of the assets that SGK manages (the “Excluded Assets”). Unless agreed to otherwise, **the client and/or his/her/its other advisors that maintain trading authority, and not SGK, shall be exclusively responsible for the investment performance of the Excluded Assets.** Unless also agreed to otherwise, SGK does not provide investment management, monitoring or implementation services for the Excluded Assets. If SGK is asked to make a recommendation as to any Excluded Assets, the client is under absolutely no obligation to accept the recommendation, and SGK shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client can engage SGK to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the *Investment Advisory Agreement* between SGK and the client.

- **emoney.** In the event that SGK provides the client with access to an unaffiliated vendor’s website such as *emoney*, and the site provides access to information and/or concepts, including financial planning, the client, should not, in any manner whatsoever, infer that such access is a substitute for services provided by SGK. Rather, if the client utilizes any such content, the client does so separate and independent of

SGK.

Client Privacy and Confidentiality. SGK maintains policies and procedures designed to help protect the confidentiality and security of client nonpublic personal information (“NPPI”). NPPI includes, but is not limited to, social security numbers, credit or debit card numbers, state identification card numbers, driver’s license number and account numbers. SGK maintains administrative, technical, and physical safeguards designed to protect such information from unauthorized access, use, loss, or destruction. These safeguards include controls relating to data access, information security, and incident response, and are reviewed to address changes in risk and business. Client information may be disclosed in response to regulatory requests, legal obligations, or as otherwise permitted by law, and any such disclosure is made in accordance with applicable privacy and confidentiality requirements.

SGK may engage non-affiliated service providers in connection with providing advisory services, and such providers may have access to client NPPI, as necessary, to perform their functions. SGK confirms that service providers maintain safeguards designed to protect client information from unauthorized access or use and provide notice to SGK in the event of a cybersecurity incident involving client information maintained by the service provider. While SGK maintains policies and procedures designed to protect client information, such measures cannot eliminate all risk. SGK will notify clients in the event of a data breach involving their NPPI as may be required by applicable state and federal laws.

Artificial Intelligence: SGK may use certain Artificial Intelligence (“AI”) tools in connection with its investment advisory services. SGK has adopted an AI Policy that governs the appropriate use of AI tools to ensure that SGK and its employees abide by their fiduciary duty and comply with all applicable regulations. AI tools are not used by SGK as a substitute for professional judgment by SGK or its employees, and all AI generated output is reviewed by SGK for accuracy. All investment decisions and recommendations are made and approved by SGK. The use of AI tools does not guarantee the accuracy of analyses or the success of any investment strategy. Clients should not assume that reliance on AI tools results in better performance or reduces risk. AI tools involve limitations and risks. These risks include, but are not limited to, data security concerns, potential inaccuracies, and possible algorithmic biases. To mitigate these risks, SGK has implemented controls such as pre-approval requirements for AI tools, restrictions on providing nonpublic personal information to public AI systems, vendor due diligence, review of AI-generated materials, and employee training on appropriate AI usage.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by SGK) will be profitable or equal any specific performance level(s).

Disclosure Statement. A copy of SGK’s written Brochure as set forth on Part 2 of Form ADV and Form CRS (Client Relationship Summary) shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement or Financial Planning and Consulting Agreement.

Availability Exchange Traded Funds. SGK utilizes exchange traded funds for certain client portfolios. In addition to SGK’s investment advisory fee described below, clients will also incur, relative to exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Custodian Charges-Additional Fees. As discussed below at Item 12 below, when requested

to recommend a broker-dealer/custodian for client accounts, SGK generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. The specific broker-dealer/custodian recommended could depend upon the scope and nature of the services required by the client. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Schwab*, do not currently charge fees on individual equity transactions [including ETFs], others do). These fees/charges are in addition to SGK's investment advisory fee at Item 5 below. SGK does not receive any portion of these fees/charges.

- C. SGK provides investment advisory services specifically tailored to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objectives. Thereafter, SGK will allocate and/or recommend that the client allocate investment assets consistent with the designated investment objectives. The client may, at any time, impose reasonable restrictions, in writing, on SGK's services.
- D. SGK does not participate in a wrap fee program.
- E. As of December 31, 2025, SGK had \$1,322,699,543 in assets under management on a discretionary basis.

Item 5 Fees and Compensation

A.

INVESTMENT ADVISORY SERVICES

If a client determines to engage SGK to provide discretionary investment advisory services on a fee-only basis, SGK's annual investment advisory fee is generally based upon a percentage (%) of the market value and type of assets placed under SGK's management (between negotiable and 1.00%) as follows:

<u>Market Value of Portfolio</u>	<u>% of Assets</u>
First \$1,000,000	1.00%*
Next \$1,000,001 to \$2,000,000	0.75%
Next \$2,000,001 to \$5,000,000	0.50%
Next \$5,000,001 to \$10,000,000	0.40%
Next \$10,000,001 +	0.30%

While SGK believes that it is important for the client to address financial planning issues on an ongoing basis, the investment advisory fee will remain the same regardless of whether the client determines to address those issues with SGK.

SGK's policy is to treat intra-quarter account additions and withdrawals equally. SGK will not charge for intra-quarter additions or withdrawals unless indicated to the contrary on the Investment Advisory Agreement executed by the client.

Fee Dispersion. SGK, in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge a fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees

and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that a client or prospective client may have regarding advisory fees.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

To the extent specifically requested by a client, SGK may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. SGK's planning and consulting fees are negotiable, but generally are \$75 to \$300 on an hourly rate basis depending upon the level and scope of the service required and the professionals rendering the service.

- B. Clients may elect to have SGK's advisory fees deducted from their custodial account. SGK's Investment Advisory Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of SGK's investment advisory fee and to directly remit that management fee to SGK in compliance with regulatory procedures. In the limited event that SGK bills the client directly, payment is due upon receipt of SGK's invoice. SGK deducts fees or bills clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter.
- C. Unless a client's circumstances dictate otherwise, SGK generally recommends that Charles Schwab and Co., Inc. and its affiliates ("Schwab") serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Schwab*, do not currently charge fees on individual equity transactions [including ETFs], others do). The fees charged by the applicable broker-dealer/custodian, and the charges imposed by ETFs, are separate from and in addition to SGK's advisory fee referenced in this Item 5. SGK does not share in any portion of those fees or expenses.
- D. SGK's annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. The Investment Advisory Agreement between SGK and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Advisory Agreement. SGK shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of months remaining in the billing quarter.
- E. Neither SGK, nor its representatives, accepts compensation from the sale of securities or other investment products.

Item 6 Performance-Based Fees and Side-by-Side Management

SGK is not a party to any performance or incentive-related compensation arrangements with its clients.

Item 7 Types of Clients

SGK's clients generally include individuals, high net worth individuals, business entities,

trusts, estates and charitable organizations. For new client relationships, SGK generally prefers a minimum asset level of \$600,000 for investment advisory services. SGK, in its sole discretion, may reduce or waive its minimum asset preference or reduce its investment advisory fee based upon certain criteria including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professionals rendering the service; prior relationships with SGK and/or its representatives, employees/family members, courtesy accounts, competition, and negotiations with the client. Additionally, clients referred by Schwab will be billed at 0.75% on the first \$1M. See Item 12 below. As result, similarly situated clients could pay different fees and similar advisory services may be available from other investment advisers for similar or lower fees. SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions regarding advisory fees.

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

A. SGK may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

SGK may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Investment Risk. Investing in securities involves risk of loss that clients should be prepared to bear, including the loss of principal investment. Past performance does not guarantee future results. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by SGK) will be profitable or equal any specific performance level. Investment strategies such as asset allocation, diversification, or rebalancing do not assure or guarantee better performance and cannot eliminate the risk of investment losses. There is no guarantee that a portfolio employing these or any other strategy will outperform a portfolio that does not engage in such strategies. While asset values may increase and client account values could benefit as a result, it is also possible that asset values may decrease and client account values could suffer a loss.

B. SGK's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis SGK must have access to current/new market information. SGK has no control over the dissemination rate of market information; therefore, unbeknownst to SGK, certain analyses may be compiled with outdated market information, severely limiting the value of SGK's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

SGK's primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. However, every investment strategy has its own

inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

Currently, SGK primarily allocates client investment assets among various individual equity (stocks), debt (bonds), mutual funds, ETFs, and other fixed income securities on a discretionary basis in accordance with the client's designated investment objectives. Each type of investment has its own unique set of risks associated with it. The following provides a short description of some of the underlying risks associated with the types of investments to which SGK allocates investment assets:

Market Risk. The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors (such as economic or political factors) but may also be incurred because of a security's specific underlying investments. Additionally, each security's price can fluctuate based on market movement, which may or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.

Unsystematic Risk. Unsystematic risk is the company-specific or industry-specific risk in a portfolio that the investor bears. Unsystematic risk is typically addressed through diversification. However, as indicated above, diversification does not guarantee better performance and cannot eliminate the risk of investment losses.

Value Investment Risk. Value stocks may perform differently from the market as a whole and following a value-oriented investment strategy may cause a portfolio to underperform growth stocks.

Growth Investment Risk. Prices of growth stocks tend to be higher in relation to their companies' earnings and may be more sensitive to market, political and economic developments than other stocks, making their prices more volatile.

Small Company Risk. Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, small capitalization companies are more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.

Commodity Risk. The value of commodity-linked derivative instruments may be affected by changes in overall market movements, commodity index volatility, changes in interest rates, or factors affecting a particular industry or commodity, such as drought, floods, weather, livestock disease, embargoes, tariffs, and international economic, political, and regulatory developments.

Foreign Securities and Currencies Risk. Foreign securities prices may decline or fluctuate because of: (i) economic or political actions of foreign governments, and/or (ii) less regulated or liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency will fluctuate in value against the U.S. dollar).

Interest Rate Risk. Fixed income securities and fixed income-based securities are subject to interest rate risk because the prices of fixed income securities tend to move in the

opposite direction of interest rates. When interest rates rise, fixed income security prices tend to fall. When interest rates fall, fixed income security prices tend to rise. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Inflation Risk. When any type of inflation is present, a dollar at present value will not carry the same purchasing power as a dollar in the future, because that purchasing power erodes at the rate of inflation.

Reinvestment Risk. Future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate), which primarily relates to fixed income securities.

Credit Risk. The issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and impact performance. Credit risk is considered greater for fixed income securities with ratings below investment grade. Fixed income securities that are below investment grade involve higher credit risk and are considered speculative.

Call Risk. During periods of falling interest rates, a bond issuer will call or repay a higher-yielding bond before its maturity date, forcing the investment to reinvest in bonds with lower interest rates than the original obligations.

Regulatory Risk. Changes in laws and regulations from any government can change the market value of companies subject to such regulations. Certain industries are more susceptible to government regulation. For example, changes in zoning, tax structure or laws may impact the return on investments.

Mutual Fund Risk. Mutual funds are operated by investment companies that raise money from shareholders and invests it in stocks, bonds, and/or other types of securities. Each fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. Mutual funds charge a separate management fee for their services, so the returns on mutual funds are reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Exchange Traded Fund Risk. ETFs are marketable securities that are designed to track, before fees and expenses, the performance or returns of a relevant index, commodity, bonds or basket of assets, like an index fund. Unlike mutual funds, ETFs trade like common stock on a stock exchange. ETFs experience price changes throughout the day as they are bought and sold. In addition to the general risks of investing, there are specific risks to consider with respect to an investment in ETFs, including, but not limited to: (i) an ETF's shares may trade at a market price that is above or below its net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally.

Item 9 Disciplinary Information

SGK has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither SGK, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither SGK, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. SGK has no other relationship or arrangement with a related person that is material to its advisory.
- D. SGK does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. SGK maintains an investment policy relative to personal securities transactions. This investment policy is part of SGK's overall Code of Ethics, which serves to establish a standard of business conduct for all of SGK's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, SGK also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by SGK or any person associated with SGK.

- B. Neither SGK nor any related person of SGK recommends, buys, or sells for client accounts, securities in which SGK or any related person of SGK has a material financial interest.
- C. SGK and/or representatives of SGK may buy or sell securities that are also recommended to clients. This practice may create a situation where SGK and/or representatives of SGK are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if SGK did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of SGK's clients) and other potentially abusive practices.

SGK has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of SGK's "Access Persons". SGK's securities transaction policy requires that an Access Person of SGK must provide the Chief Compliance Officer or their designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or their designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date SGK selects; provided, however that at any time that SGK has only one Access Person, he or she shall not be required to submit any securities report

described above.

- D. SGK and/or representatives of SGK may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where SGK and/or representatives of SGK are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, SGK has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of SGK's Access Persons.

Item 12 Brokerage Practices

- A. If the client requests that SGK recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct SGK to use a specific broker-dealer/custodian), SGK generally recommends that investment advisory accounts be maintained at Charles Schwab & Co., Inc. ("Schwab"). Before engaging SGK to provide investment advisory services, the client will be required to enter into a formal Investment Advisory Agreement with SGK setting forth the terms and conditions under which SGK will manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Depending on which custodian clients select to maintain their account, they may experience differences in customer service, transaction timing, the availability of sweep account vehicles and money market funds, and other aspects of investing. In certain instances, these differences could cause differences in account performance.

Factors that SGK considers in recommending Schwab (or any other broker-dealer/custodian) include historical relationship with SGK, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Schwab can charge transaction fees for effecting certain securities transactions (**See** Item 4 above). To the extent that a transaction fee will be payable by the client to Schwab, the transaction fee shall be in addition to SGK's investment advisory fee referenced in Item 5 above.

To the extent that a transaction fee is payable, SGK shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where SGK determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although SGK will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, SGK's investment advisory fee.

1. Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, SGK receives from Schwab (or could receive from other broker-dealer/custodians, unaffiliated investment managers, vendors, investment platforms, and/or product/fund sponsors) without cost (and/or at a discount) support services and/or products, certain of which assist SGK to better monitor and service client accounts maintained at such institutions. The support

services that SGK receives can include: investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or free consulting services, discounted and/or free travel and attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by SGK in furtherance of its investment advisory business operations. However, SGK's clients do not pay more for investment transactions executed and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by SGK to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions regarding the above arrangements and conflict of interest presented.

2. Directed Brokerage. SGK recommends that its clients utilize the brokerage and custodial services provided by Schwab. SGK does not generally accept directed brokerage arrangements (when a client requires that account transactions be executed through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and SGK will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by SGK. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

If the client directs SGK to execute securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to execute account transactions through alternative clearing arrangements that may be available through SGK. Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

- B. Transactions for each client account generally will be effected independently unless SGK decides to purchase or sell the same securities for several clients at approximately the same time. SGK may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among SGK's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. SGK shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

- A. For those clients to whom SGK provides investment supervisory services, account reviews are conducted on an ongoing basis by SGK's Principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise SGK of any changes in their investment objectives and/or financial situation. All clients (in person, via telephone or email) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with SGK on an annual basis.
- B. SGK may conduct account reviews on a non-periodic basis upon a triggering event, such as a change in client investment objectives and/or financial situation, market events, or specific client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. SGK may also provide a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

- A. As referenced in Item 12.A.1 above, SGK receives economic benefits from Schwab without cost (and/or at a discount) support services and/or products. SGK's clients do not pay more for investment transactions executed and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by SGK to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement. SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions that a client or prospective client may have regarding the above arrangement and the conflict of interest presented.
- B. SGK engages promoters to introduce new prospective clients to SGK consistent with the Investment Advisers Act of 1940, its corresponding Rules, and applicable state regulatory requirements. If the prospect subsequently engages SGK, the promoter shall generally be compensated by SGK for the introduction. Because the promoter has an economic incentive to introduce the prospect to SGK, a conflict of interest is presented. The promoter's introduction shall not result in the prospect's payment of a higher investment advisory fee to SGK (i.e., if the prospect was to engage SGK independent of the promoter's introduction).
- C. SGK no longer participates in the Schwab Advisor Network effective June 13, 2025. SGK will continue to pay Schwab on past referrals under the program. SGK will no longer receive new referrals from the program. Referrals made June 12, 2025, or prior are considered in progress. SGK will have 24 months to close that business.

Item 15 Custody

SGK shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. SGK may also provide a written periodic report summarizing account activity and performance. In preparing this report SGK shall rely upon account/investment information provided by the account custodian, and pricing information provided by Schwab, the primary account custodian used by SGK's clients.

To the extent that SGK provides clients with periodic account statements or reports, SGK urges clients to carefully review those statements and compare them to custodial account statements. SGK's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. The account custodian does not verify the accuracy of SGK's advisory fee calculations.

In addition, certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from SGK to transfer client funds or securities to third parties. These arrangements are disclosed at Item 9 of Part 1 of Form ADV. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association No-Action Letter*, the affected accounts are not subject to an annual surprise CPA examination.

Item 16 Investment Discretion

The client can determine to engage SGK to provide investment advisory services on a discretionary basis. Before SGK assumes discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming SGK as the client's attorney and agent in fact, granting SGK full authority to buy, sell, or otherwise execute investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage SGK on a discretionary basis may, at any time, impose restrictions, in writing, on SGK's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe SGK's use of margin, etc.).

Item 17 Voting Client Securities

SGK is responsible for voting client proxies, and shall do so in conjunction with the proxy voting administrative and due diligence services provided by Proxy Edge, an unaffiliated nationally recognized proxy voting service of Broadridge Financial Solutions, Inc. ("Broadridge") SGK, in conjunction with the services provided by Broadridge, shall monitor corporate actions of individual issuers and investment companies consistent with SGK's fiduciary duty to vote proxies in the best interests of its clients. With respect to individual issuers, SGK may be solicited to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility. With respect to investment companies (e.g., mutual funds), SGK may be solicited to vote on matters including the approval of advisory contracts, distribution plans, and mergers. SGK (in conjunction with the services provided by Broadridge) shall maintain records pertaining to proxy voting as required under the Advisers Act. Information pertaining to how SGK voted on any specific proxy issue is also available upon written request. Any questions regarding SGK's proxy voting policy shall be directed to Jennifer L. Wiggins, Chief Compliance Officer of SGK. **Please Note:** No client is under any obligation to have SGK (in conjunction with Broadridge) vote the client's proxies per the above proxy voting process. In the event that a client wants to vote his/her/its own proxies, the client can advise Registrant's Chief Compliance Officer, Jennifer L. Wiggins, in writing. With respect to investment companies (e.g., mutual funds), SGK may be solicited to vote on matters including the approval of advisory contracts, distribution plans, and mergers. SGK shall maintain records pertaining to proxy voting as required pursuant to Rule 204-2(c)(2) under the Advisers Act. Copies of Rules 206(4)-6 and 204-2(c)(2) are available upon written request.

Class Actions: The client shall maintain exclusive responsibility for all legal proceedings or other type events pertaining to the assets managed by SGK, including, but not limited to, class action lawsuits. SGK has identified an unaffiliated service provider, Broadridge,

to assist the client, for a fee (generally 20% of the recovery), with class-action matters. SGK shall not receive any compensation from the service provider. **Please Note:** The client is under no obligation to engage the service provider. **Please Also Note:** SGK does not participate in class action proceedings on behalf of its clients. Thus, if the client chooses not to engage Broadridge, the client will be exclusively responsible to monitor and pursue all class action claims.

Item 18 Financial Information

- A. SGK does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. SGK is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. SGK has not been the subject of a bankruptcy petition.

ANY QUESTIONS: SGK's Chief Compliance Officer, Jennifer L. Wiggins, remains available to address any questions regarding the above disclosures and arrangements.

Item 1 Cover Page

A.

John S. Steigerwald

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about John S. Steigerwald that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about John S. Steigerwald is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

John S. Steigerwald was born in 1965. Mr. Steigerwald graduated from the University of Manitoba in 1987, with a Bachelor of Arts degree in Applied Economics and in 1995 from the University of Pennsylvania, Wharton School of Business with a Master of Business Administration degree in Finance and Investment Management. Mr. Steigerwald has been the Chief Executive Officer and a Portfolio Manager of Steigerwald, Gordon & Koch Inc. since 2009. From 1996 to 2009, Mr. Steigerwald was the President, Chief Compliance Officer and a Portfolio Manager of Riggs Steigerwald.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Steigerwald is not actively engaged in any other investment-related businesses or occupations.
- B. SGK Real Estate Investments, LLC was formed by John Steigerwald, Jeffrey Gordon and Darren Koch. The purpose of the company was to purchase the building Steigerwald, Gordon & Koch Inc. offices are located.

Item 5 Additional Compensation

As an owner of SGK, Mr. Steigerwald's compensation is indirectly contingent on the number of clients he and other representatives refer to SGK, the performance of client accounts, and the addition of investment assets to current client accounts.

Item 6 Supervision

SGK provides investment advisory and supervisory services in accordance with SGK's policies and procedures manual. The primary purpose of SGK's Rule 206(4)-7 policies and procedures manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). SGK's Chief Compliance Officer, Jennifer L. Wiggins, is primarily responsible for the implementation of SGK's policies and procedures and overseeing the activities of SGK's supervised persons under the Act. Ms. Wiggins is available at (703) 777-8826.

Item 1 Cover Page

A.

Jeffrey A. Gordon

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Jeffrey A. Gordon that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Jeffrey A. Gordon is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Jeffrey A. Gordon was born in 1970. Mr. Gordon graduated from the University of Virginia in 1992, with a Bachelor of Science degree in Commerce with Distinction and in 1996 from the University of Pennsylvania, Wharton School of Business with a Master of Business Administration degree in Finance and Investment Management. Mr. Gordon has been the President and a Portfolio Manager of Steigerwald, Gordon & Koch Inc. since 2009. From 2002 to 2009, Mr. Gordon was a Vice President and a Portfolio Manager of Riggs Steigerwald.

Mr. Gordon has been a CFA[®] Charter Holder since 2004. CFA[®] designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 200,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

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

Global Recognition

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

Comprehensive and Current Knowledge

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

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Gordon is not actively engaged in any other investment-related businesses or occupations.
- B. SGK Real Estate Investments, LLC was formed by John Steigerwald, Jeffrey Gordon and Darren Koch. The purpose of the company was to purchase the building Steigerwald, Gordon & Koch Inc. offices are located.

Item 5 Additional Compensation

As an owner of SGK, Mr. Gordon's compensation is indirectly contingent on the number of clients he and other representatives refer to SGK, the performance of client accounts, and the addition of investment assets to current client accounts.

Item 6 Supervision

SGK provides investment advisory and supervisory services in accordance with SGK's policies and procedures manual. The primary purpose of SGK's Rule 206(4)-7 policies and procedures manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). SGK's Chief Compliance Officer, Jennifer L. Wiggins, is primarily responsible for the implementation of SGK's policies and procedures and overseeing the activities of SGK's supervised persons under the Act. Ms. Wiggins is available at (703) 777-8826.

Item 1 Cover Page

A.

Darren A. Koch

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Darren A. Koch that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Darren A. Koch is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Darren A. Koch was born in 1970. Mr. Koch graduated from Radford University in 1992, with a Bachelor of Business Administration degree in Marketing. Mr. Koch has been the Vice President and a Financial Planner of Steigerwald, Gordon & Koch Inc. since 2009. From 2005 to 2009, Mr. Koch was a Relationship Manager of Riggs Steigerwald.

Mr. Koch is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Koch has held the designation of Chartered Mutual Fund Counselor™ (CMFC™) since 2003. The College for Financial Planning provides CMFC™ students with a thorough education focusing exclusively on mutual funds. The CMFC™ program emphasizes how to thoroughly evaluate mutual funds as well as how to use that information to make appropriate recommendations. Individuals who hold the CMFC™ designation have completed a course of study encompassing all aspects of mutual funds and their uses as investment vehicles. The program is designed for approximately

120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment. All CMFC™ designees must sign a commitment to ongoing continuing education credit to ensure that they stay current in the field.

Mr. Koch has held the designation of Accredited Asset Management Specialist™ (AAMS™) since 2001. The AAMS® is awarded by the College for Financial Planning to investment professionals who complete its 12-module AAMS® Professional Education Program, pass an examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the AAMS® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the AAMS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Mr. Koch has held the designation of Chartered Retirement Plans SpecialistSM (CRPS) since 2009. The College of Financial Planning® awards the CRPS designation to applicants who complete the CRPS professional education program, pass a final examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the CRPS designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CRPS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Mr. Koch has held the designation of Certified Exit Planning Adviser (CEPA) since 2013. The Certified Exit Planning Adviser (CEPA) Program is taught by nationally recognized experts in the field of exit planning; this 5-day executive MBA style program and includes a final examination. The CEPA Program offers professionals an innovative learning experience, performance-enhancing resources, and the strategic tools to help them advance their exit planning practice, including value enhancement. The CEPA Program process integrates exit strategy into business, personal and financial goals of the business owner. The process consists of three major components: 1) Maximizing Business Value or Value Enhancement, 2) Personal Financial Planning, and 3) Life After Business Planning. The process teaches that exit strategy is business strategy. It is about building, harvesting and preserving wealth and integrating best business practices into daily operations. The Methodology focuses on enterprise value and is a revenue producing model for professional advisors that is justifiable with growth of overall enterprise value.

Certification process elevates professional standards, enhances individual performance and differentiates CEPA professionals from those who do not have the knowledge needed to provide high quality exit planning services to business owners.

Continuing Education Credits are offered for six major professionals associations, including CPA and the CFP® mark, making the CEPA Program the most widely accepted and endorsed professional exit planning program in the world.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. Mr. Koch is not actively engaged in any other investment-related businesses or occupations.
- B. SGK Real Estate Investments, LLC was formed by John Steigerwald, Jeffrey Gordon and Darren Koch. The purpose of the company was to purchase the building Steigerwald, Gordon & Koch Inc. offices are located.

Item 5 Additional Compensation

As an owner of SGK, Mr. Koch's compensation is indirectly contingent on the number of clients he and other representatives refer to SGK, the performance of client accounts, and the addition of investment assets to current client accounts.

Item 6 Supervision

SGK provides investment advisory and supervisory services in accordance with SGK's policies and procedures manual. The primary purpose of SGK's Rule 206(4)-7 policies and procedures manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). SGK's Chief Compliance Officer, Jennifer L. Wiggins, is primarily responsible for the implementation of SGK's policies and procedures and overseeing the activities of SGK's supervised persons under the Act. Ms. Wiggins is available at (703) 777-8826.

Item 1 Cover Page

A.

Harry P. Karageorge

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Harry P. Karageorge that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Harry P. Karageorge is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Harry P. Karageorge was born in 1970. Mr. Karageorge graduated from the University of Virginia in 1992, with a Bachelor of Science degree in Commerce with a concentration in Finance and Management Information Systems. Mr. Karageorge has been an investment advisor representative of Steigerwald, Gordon & Koch Inc. since October 2016. From November 2012 through September 2016, Mr. Karageorge was a Consultant with MPK Investments, LLC. From June 2007 through October 2012, Mr. Karageorge was a Vice President with Generational Wealth Disciplines.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

Mr. Karageorge's compensation with SGK is based on the amount of client assets he introduces to SGK for management, the performance of those accounts, and the addition of investment assets to those accounts.

Item 6 Supervision

SGK provides investment advisory and supervisory services in accordance with SGK's policies and procedures manual. The primary purpose of SGK's Rule 206(4)-7 policies and procedures manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). SGK's Chief Compliance Officer, Jennifer L. Wiggins, is primarily responsible for the implementation of SGK's policies and procedures and overseeing the activities of SGK's supervised persons under the Act. Ms. Wiggins is available at (703) 777-8826.

Item 1 Cover Page

A.

Madolynn H. Morken

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Madolynn H. Morken that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Madolynn H. Morken is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Madolynn H. Morken was born in 1990. Ms. Morken graduated from the College of Saint Benedict in 2012, with a Bachelor of Arts degree in Political Science. Ms. Morken has been a Financial Planner of Steigerwald, Gordon & Koch Inc. since January 2022. From December 2018 through November 2021, Ms. Morken was a Wealth Advisor with Burney Partners, LLC. From October 2015 through December 2018, Ms. Morken was a Client Service Associate with Kendall Capital Management.

Ms. Morken is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold

the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Ms. Morken has held the designation of Certified Tax Specialist (CTST™) since 2024. The CTST™ credential is issued by the Institute of Business and Finance. The CTST™ credential provides holders with knowledge of how to help reduce clients' tax obligations. CTST™ designation holders

can provide guidance on who must file an income tax return, the impact of current tax regulations, business income and home businesses, tax credits, itemized deductions, and retirement plans, and LLCs and S corporations. To be eligible to obtain the CTS™ designation, a candidate must have a bachelor's degree or one year of financial services work experience. To obtain the designations, candidates must study for an online, closed-book examination. Designation holders must complete 30 hours of continuing education every two years to maintain the CTS™ designation.

Ms. Morken has held the Certified Divorce Financial Analyst® certification since 2026. The Certified Divorce Financial Analyst® certification is issued by The Institute for Divorce Financial Analysts (IDFA™), which is a national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena.

Founded in 1993, IDFA™ provides specialized training to accounting, financial, and legal professionals in the field of pre-divorce financial planning. Over the years, IDFA™ has certified more than 5,000 professionals in the U.S. and Canada as Certified Divorce Financial Analyst® certificants. The CDFA® certification is available to individuals who have a minimum of three years' experience as a financial professional, accountant, or matrimonial lawyer. To acquire the certification, a candidate must successfully pass all exams and be in good standing with their broker dealer (if applicable) and the FINRA/SEC or other licensing or regulatory agency.

There are currently four methods of pursuing the CDFA® certification, all culminating in an examination consisting of 150 multiple-choice questions. To retain the Certified Divorce Financial Analyst® certification, a CDFA® certificant must obtain thirty divorce-related hours of continuing education every two years, remain in good standing with the IDFA™, and keep his/her dues current. To learn more about the CDFA® certification, visit <http://www.institutedfa.com/>.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

None.

Item 6 Supervision

SGK provides investment advisory and supervisory services in accordance with SGK's policies and procedures manual. The primary purpose of SGK's Rule 206(4)-7 policies and procedures

manual is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the “Act”). SGK’s Chief Compliance Officer, Jennifer L. Wiggins, is primarily responsible for the implementation of SGK’s policies and procedures and overseeing the activities of SGK’s supervised persons under the Act. Ms. Wiggins is available at (703) 777-8826.

Item 1 Cover Page

A.

Eric F. Randolph

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Eric F. Randolph that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Eric F. Randolph is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Eric F. Randolph was born in 1967. Mr. Randolph graduated from Morehouse College in 1993 with a Bachelor of Science degree in business administration. Mr. Randolph has been a Financial Advisor of Steigerwald, Gordon & Koch Inc. since July 2022. From October 2003 through July 2022, Mr. Randolph was a Portfolio Manager with Hopwood Financial Services, Inc.

Mr. Randolph is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

A.

Jennifer Mascarenas

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Jennifer Mascarenas that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

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

Item 2 Education Background and Business Experience

Jennifer Mascarenas was born in 1974. Ms. Mascarenas graduated from Arizona State University in 2001, with a Bachelor of Science degree in Finance. Ms. Mascarenas has been a Financial Planner of Steigerwald, Gordon & Koch Inc. since May 2024. From October 2021 through November 2023, Ms. Mascarenas was a Senior Financial Planner of Bogart Wealth, LLC. From February 2020 through October 2021, Ms. Mascarenas was a Trust Advisor with Northern Trust. From August 2015 through February 2019, Ms. Mascarenas was an Associate Wealth Advisor with Mariner Wealth Advisors.

Ms. Mascarenas is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

A.

Benjamin D. Scrivener

Steigerwald, Gordon & Koch Inc.

ADV Part 2B, Brochure Supplement

Dated: August 12, 2026

Contact: Jennifer L. Wiggins, Chief Compliance Officer
893-A Harrison Street, S.E.
Leesburg, Virginia 20175

B.

This Brochure Supplement provides information about Benjamin D. Scrivener that supplements the Steigerwald, Gordon & Koch Inc. (“SGK”) Brochure; you should have received a copy of that Brochure. Please contact Jennifer L. Wiggins, Chief Compliance Officer, if you did not receive Steigerwald, Gordon & Koch Inc.’s Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Benjamin D. Scrivener is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Benjamin D. Scrivener was born in 1991. Mr. Scrivener graduated from Christendom College in 2014, with a Bachelor of Arts degree in Political Science and Economics and from American College of Financial Services in 2023 with a Master of Science degree in Financial Planning. Mr. Scrivener has been a Financial Planner of Steigerwald, Gordon & Koch Inc. since November 2025. From April 2019 through September 2025, Mr. Scrivener was a Wealth Advisor with Burney Wealth Management.

Mr. Scrivener is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER[®] professional or a CFP[®] professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Scrivener has held the designation of Retirement Income Certified Professional® (RICP®) since 2022. The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning,

maximizing Social Security and other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest form of academic accreditation.

Mr. Scrivener became an Accredited Investment Fiduciary® (AIF®) Designee in 2018. The AIF® Designation certifies that the recipient has demonstrated specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF® Designation, the individual must annually attest to the Code of Ethics and Conduct Standards and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the certification division of Fi360 that is responsible for ongoing management of the program. Fi360 is accredited by the ANSI National Accreditation Board for the AIF® Designation, making it one of few independently accredited designations recognized by FINRA.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

None.

Item 6 Supervision

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