

Percy E. Bolton Associates, Inc.

1122 East Green Street

Pasadena, CA 91106

626-356-9660

[www.percybolton.com](http://www.percybolton.com)

Part 2A of Form ADV

Brochure

March 25, 2026

This brochure provides information about the qualifications and business practices of Percy E. Bolton Associates, Inc. If you have any questions about the contents of this brochure, please contact us at 626-356-9660. The information in this brochure has not been approved or verified by the United Securities and Exchange Commission or by any state securities authority.

Percy E. Bolton Associates, Inc. is a Registered Investment Adviser. Registration with the United States and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

### **Statement of Qualifications**

Additional information about Percy E. Bolton Associates, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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We will ensure that clients receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes as necessary. We will further provide clients with a new brochure as necessary based on changes or new information, at any time, without charge.

Currently, our brochure may be requested by contacting Percy E. Bolton, CFP®, at 626-356-9660. Our brochure is also available free of charge on our website at [www.percybolton.com](http://www.percybolton.com).

Additional information about Percy E. Bolton Associates, Inc. is available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with PEBA who are registered, or are required to be registered, as investment adviser representatives of PEBA. You may find additional information regarding PEBA's registration with the state of California by visiting <https://brokercheck.finra.org/>.

## Item 4 Advisory Business

### **Firm Description and Principal Owners**

Percy E. Bolton Associates, Inc. was incorporated in the state of California in 1986. It has been providing comprehensive financial planning and investment consulting services to individuals and businesses since its inception. It is a registered advisor in the state of California. Its founder, Percy E. Bolton, is 100% owner of the corporation and the sole financial planner in the firm.

### **Type of Advisory Services**

Percy E. Bolton Associates, Inc. provides fee-only holistic financial planning services and investment consulting services to individuals, families and non-profits. These services may be general in nature or focused on a need or area, depending upon the Client's unique circumstances. Advice is rendered in the areas of cash flow, balance sheet, budgeting, income taxes, investment policy, retirement policy, retirement income management, estate planning, caretaking, longevity, special needs planning, goals and objective setting.

### **Percy E. Bolton Associates, Inc. provides the following types of services:**

#### **Financial Planning Services**

At Percy E. Bolton Associates, Inc., a unique, procedurally prudent process guides our approach. We employ a seven-step process to develop, supervise and manage financial plans that encompasses all facets of our clients' financial life.

#### **Step One: Discovery**

- We begin with an in-depth consultation to identify your objectives, values, and unique financial profile.

#### **Step Two: Data Collection**

- We conduct comprehensive data gathering to gain a complete understanding of your current financial landscape.

#### **Step Three: Analysis**

- We perform a detailed evaluation of your financial position, identifying opportunities, risks, and appropriate strategies.

#### Step Four: Recommendations

- We provide personalized, written recommendations, offering clarity and actionable guidance for each service area.

#### Step Five: Presenting the Financial Planning Recommendation(s)

- We provide clear planning details so clients can balance goals and constraints. Recommendations include their assumptions, timing, priority, and coordination needs to support informed decisions.

#### Step Six: Implementation

- We assist in executing the financial plan with precision and close attention to detail.

#### Step Seven: Ongoing Review

- We maintain regular meetings and progress reports, updating your plan as circumstances evolve, safeguarding your interests, and supporting your objectives.

### **Core Service Areas**

- Tax planning to maximize efficiency and minimize liabilities
- Employee benefit evaluation and optimization
- Investment portfolio analysis and management
- Comprehensive insurance policy assessment
- Financial Organization
- Legacy and charitable planning solutions

### **2. Investment Consulting**

Investment Consulting include the development of client's investment program. This development consists of the following activities: 1) Analyze current investment position 2) Development of investment program 3) Assist with establishing goals and objectives, 4) Develop the asset allocation framework, 5) Design optimal portfolio 6) Prepare a written Investment Policy Statement, 7) Implement policy, 8) Serves as the primary contact for service and advice, 9) Monitor the investment plan against the stated goals, and 10) Conduct an annual review meeting.

### **3. Estate Planning**

We offer Estate Planning services for our clients to assist with general information as they apply to reviews of existing plans, gathering information needed to provide outside firms in the creation of documents, and updating existing plans for clients.

***The fees associated with estate planning-related services are separate and in addition to our ongoing financial planning or advisory fees and are disclosed in Item 5.***

Depending on the client's needs and desires for estate planning document review, preparation, or updates, we will engage with EncorEstate Plans, a third-party scrivener service, or estate planning attorneys.

#### **Item 5 Fee and Compensation**

The specific manner in which fees are charged by Percy E. Bolton Associates, Inc. (PEBA) is established in a client's written agreement with "PEBA".

Below is a description of the advisory service PEBA typically offers and the corresponding fee.

#### **Service: Financial Planning**

The fee for our financial planning service is based on a retainer model. This ongoing retainer is meant to be more of a lifetime process than a one-time event. It is designed for families and individuals who prefer an ongoing holistic financial planning relationship.

The fee is calculated based on the complexity of planning needs and the anticipated time it will take to plan, develop and manage the client's program. Our monthly fee for this service typically ranges between \$375 to \$3,000.

Percy E. Bolton Associate, Inc. is paid monthly in arrears and is considered to earn its fees on a monthly basis. The retainer is cancelable anytime without restriction. Upon termination, no further payment or refund is due.

### Payment Methods

The Client can pay via credit/debit card, or ACH or check.

### Compensation of the Adviser

PEBA is a fee-only financial advisory firm and does not sell investment or insurance products. Unless specifically requested by Client (with such request accepted by Adviser), Adviser does not execute recommendations on behalf of Clients. Clients are responsible, but under no obligation, to implement any recommendations made by Adviser.

### Third-Party Fees

In addition to Adviser's fee, Clients may incur certain other fees and charges to implement Adviser's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fee.

### Negotiation of Fees

Fees may be negotiated, as determined by the Adviser, based upon individual Client needs and circumstances. It is the exception, not the rule, that fees are negotiated.

### Termination of Agreement and Remaining Fees due Client or Adviser

For Financial planning services, either party may terminate the Agreement at any time with written notice to the other. The Client may terminate the Agreement without penalty by providing written notice within ten days of signing the Agreement. If the Client terminates after the ten-day cancellation period, but within the first month, all fees paid to that point are non-refundable. If the Adviser terminates after the ten-day cancellation period, but within the first month, all fees paid to that point will be refunded.

All services provided, and the anticipated fees are detailed in the written agreements.

**Service: Investment Consulting.**

For the Investment Consulting service, an annual retainer is charged. Fees are determined based on the complexity of the client's circumstances and the degree of consulting required. Our annual fee for this service typically ranges between \$3,000 to \$10,000.

Payment Methods

The Client can pay via check, credit/debit card, or ACH.

Fee Billing

The fee is billed monthly. For this investment consulting service, a monthly fee is charged in arrears.

Compensation of the Adviser

PEBA is a fee-only financial advisory firm and does not sell investment or insurance products. Unless specifically requested by Client (with such request accepted by Adviser), Adviser does not execute recommendations on behalf of Clients. Clients are responsible, but under no obligation, to implement any recommendations made by Adviser.

Third-Party Fees

In addition to Adviser's fee, Clients may incur certain other fees and charges to implement Adviser's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fee.

### Negotiation of Fees

Fees may be negotiated, as determined by the Adviser, based upon individual Client needs and circumstances. It is the exception, not the rule, that fees are negotiated.

Termination of Agreement and Remaining Fees due Client or Adviser. Investment Management Consulting Agreements. Investment Management Consulting Agreements shall automatically renew on a monthly basis, on the date specified in the Agreement. Either party may terminate the Investment Consulting Agreement by giving ten (10) days' prior written notice to the other at any time during the term of this Agreement. There is no refund due upon termination.

All services provided, and the anticipated fees are detailed in the written agreements.

### **Service: Estate Planning**

The fees for estate planning will be determined based on the hourly rate of \$550.000. The typical time to perform this service is from 2 to 4 hours.

### Payment Methods

All fees are in hard dollars. The Client can pay via check, credit/debit card, or ACH.

### Fee Billing

The fee is due and payable immediately upon presentation of estate planning documents.

### Negotiation of Fees

The fees may be negotiable in certain cases, will be agreed to at the start of the engagement, and are due at the end of the engagement. Clients are not required to use any third-party products or services that we may recommend, and they can receive similar services from other professionals at a similar or lower cost.

Termination of Agreement and Remaining Fees due Client or Adviser. Estate Planning Agreements. Estate Planning Agreement will automatically terminate upon delivery of estate planning documents. There is no refund due upon termination.

All services provided, and the anticipated fees are detailed in the written agreements

### **Tailored Relationships**

Each account has Client imposed restriction. Each portfolio selected is based on the tailored and unique need of the client. Percy E. Bolton Associates has no discretion over the total amount of securities bought or sold. All accounts are non-discretionary, which require prior approval for all transactions. Through the development of an investment policy statement, the client places restrictions on portfolio makeup regarding debt/equity mix, diversification of funds, and the quality rating of the funds.

### **No Participation in Wrap Fee Programs**

Percy E. Bolton Associate, Inc. does not participate in any wrap fee program.

### **Management of Client Assets**

Percy E. Bolton Associates, Inc. operates strictly on a non-discretionary basis. The number of assets Percy E. Bolton Associates manage on a non-discretionary basis as of December 31, 2025 is \$36,310,177.

The agreement the client signs with PEBA provides non-discretionary authority and it is our policy to require prior approval from the client for all transactions within the account.

### **Other Fees**

Custodians or brokerage firms may charge annual fees or transactions for the purchase or sale of certain mutual funds.

Mutual Funds charge management fees for their advisory services and may charge 12(b)-1 fees.

Clients pay these fees in addition to the fees paid to Percy E. Bolton Associates, Inc. PEBA receives no portion of these fees.

### **Prepayment of Fees**

All fees and their payment schedules are outlined in the Letter of Agreement.

The Financial Planning Service paid by the client to PEBA is monthly in arrears. The Client may terminate the Financial Planning Agreement without penalty by providing written notice within 10 days of signing the Agreement. If the Client terminates after the 10 days cancellation period, no further payment or refund is due.

The Investment Consulting Service is paid monthly in arrears. Either party may terminate the Investment Consulting Agreement by giving ten (10) days' prior written notice to the other at any time during the term of this Agreement. There is no refund due upon termination.

Estate Planning Services is paid upon completion of the documents. Either party may terminate the Estate Planning Agreement by giving written notice to the other party at any time during the term of the Agreement. There is no refund due at termination.

### **No Asset-Based Fees, Commissions or Service Fees**

Percy E. Bolton Associates, Inc. receives fees only from clients. No commission, trailing fees, asset-based fees, service fees, or referral fees are received.

### **Item 6 Performance-Based Fees and Side-By Side Management**

Percy E. Bolton Associates, Inc. does not accept nor charge performance-based fees, that is, fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **Item 7 Types of Clients and Minimum Account Size**

We generally provide advice to individuals, couples, families, and non-profits. There is no minimum account requirement. Some of the clients of Percy E.

Bolton Associates, Inc. are the sponsors of investment funds. These funds are typically tax-exempt funds such as pensions, thrift, endowment, and foundation funds. The sponsors are private corporations and non-profit organizations.

There is no minimum account size.

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

### **Methods of Analysis**

PEBA use SEI portfolio models and help clients select which best fit their needs. The client completes a risk tolerance questionnaire; it is scored and then a proposal is prepared. The client can accept or reject the proposal. If the client rejects the initial proposal, we will continue to prepare proposals until we create one acceptable to the client. When the client finally accepts the suggested proposal, we then prepare an investment policy statement. The investment policy statement will guide our investment process and procedures.

### **Investment Strategies**

(PEBA) utilizes SEI portfolio models to assist clients in choosing investment strategies that best align with their financial goals and risk tolerance. SEI, a global provider of investment solutions, offers a diverse range of portfolio models designed to meet varying client needs.

When working with clients, PEBA presents the suite of SEI portfolio models available. These models are developed based on different investment objectives, asset allocations, and risk profiles. PEBA guides clients through an evaluation process, considering factors such as time horizon, liquidity needs, risk appetite, and long-term financial goals.

- Assessment of client's financial situation and objectives
- Review of available SEI portfolio models
- Discussion of risk and return expectations

- Recommendation of model(s) that best fit client's needs

The goal is to match each client with an investment strategy that is tailored to their unique circumstances, ensuring both comfort with risk and alignment with desired outcomes.

If the client decides to select SEI as their investment adviser, SEI takes on the responsibility of managing the investment portfolio according to the agreed-upon strategy. As part of this process, an investment policy statement (IPS) is established.

The investment policy statement serves as a key guiding document for SEI's investment process. It outlines the client's investment objectives, constraints, risk tolerance, asset allocation targets, and any specific guidelines or restrictions. The IPS ensures that SEI's portfolio management decisions are made in accordance with the client's wishes and provides a framework for ongoing monitoring and review.

1. Defines objectives: Specifies what the client wants to achieve through investing.
2. Establishes guidelines: Details asset allocation, permitted investments, and risk parameters.
3. Sets monitoring standards: Lays out how performance will be tracked and reviewed.
4. Provides accountability: Ensures SEI acts in the client's best interest, following agreed-upon standards.

By leveraging SEI portfolio models and a well-crafted investment policy statement, PEBA helps clients choose an investment approach that is both strategic and personalized. If SEI is selected as the investment adviser, the IPS serves as the cornerstone for portfolio management, ensuring that the client's investments are managed in line with their goals and preferences.

## **Risk of Loss**

Investing in securities involves a risk of loss that clients should be prepared to bear.

### **Item 9 Disciplinary information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the advisor. Percy E. Bolton has had no legal or disciplinary events.

Percy E. Bolton Associates, Inc. has not been convicted, pled guilty or nolo contendere (no contest) to any (a) felony; (b) misdemeanor.

Percy E. Bolton Associates, Inc. has not been the named subject of a pending criminal proceeding.

Percy E. Bolton Associates, Inc. has not been found to have been involved in a violation of an investment-related statute or regulation.

Percy E. Bolton associates, Inc. has not been the subject of any order, judgment, and decree permanently or temporarily enjoining our firm from engaging in any investment-related activities.

Percy E. Bolton Associate, Inc. has never been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or foreign financial regulatory authority in which our firm or a management person:

1. Was found to have caused an investment related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of SRO's rules and (i) barred or suspended from membership or from association with other members, or expelled from membership, (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

## Item 10 Other Financial Industry Activities and Affiliations

Percy E. Bolton Associates, Inc. is not registered as a broker dealer nor has an application pending to register as broker-dealer or registered representative of a broker-dealer.

Percy E. Bolton Associates, Inc. is not registered nor has an application pending to register as a futures commission merchant, commodity pool operator, commodity trader advisor, or an associated person of the foregoing entities.

Percy E. Bolton Associates, Inc. has no other business relationship or arrangement of any type. It provides exclusively financial planning, investment advice and estate planning fulfillment services.

Percy E. Bolton Associates, Inc. does not recommend or select other investment advisers for its clients, nor does it receive compensation from any advisers.

PEBA has and will continue to develop relationships with professionals who provide, the following types of services: legal, accounting, mortgage brokerage, banking, tax preparation, insurance brokerage, and other personal services. To reduce potential conflicts, we typically offer clients multiple referrals and encourage clients to also consider other sources for referrals. We don't pay or receive referral fees.

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

Percy is a CERTIFIED FINANCIAL PLANNER™, and as such, Percy E. Bolton Associates, Inc. has adopted the Code of Ethics set forth by the CFP Board. This can be found at its websites: [www.cfpboard.org](http://www.cfpboard.org).

These Code of Ethics include:

- Providing advice that is always in the client's best interest.

- Providing professional services with respect, integrity, objectivity, fairness, and diligence.
- Maintaining the knowledge and skill necessary to provide professional services competently.
- Disclosing conflicts of interest.
- Protecting the confidentiality of all client information.

Percy E. Bolton Associates, Inc. does not recommend the purchase or sale of any security or type of security.

Percy E. Bolton Associates, Inc., has no investment committee or similar group, which determines or approves what investment advice shall generally be rendered to any client or to which client such investment advice shall be rendered.

PEBA and its owner may buy and sell securities that were also recommended to clients and held by clients. We foresee no material conflict of interest because the purchase or sale is minimal in relation to the total outstanding value and would have negligible effect on the market price.

The Chief Compliance Officer of Percy E. Bolton Associates, Inc., is Percy E. Bolton. He is the owner and there are no employees. He reviews trades in his own accounts. Since these trades are minimal in relation to the total outstanding value, personal trading does not affect the market price.

#### Item 12 Brokerage Practices

Percy E. Bolton Associates, Inc. does not use soft dollar benefits. Nor do we recommend, request, or require that a client execute transactions through a specified broker-dealer. The agreement the Client signs with the PEBA states that PEBA shall not sell or purchase any securities except upon written directions from Client.

Percy E. Bolton Associates, Inc. does not select or recommend broker-dealers for client transaction. Nor does it receive any compensation from any broker-dealer. The Client may appoint an investment advisor to manage a portion of

the investments. Such appointment shall be evidenced in a writing signed by Client and investment advisor. Upon receiving such writing, PEBA shall not be responsible for the management of such investments which has been the assigned to the investment advisor. The investment advisor will be responsible for providing such reports and valuations as Client may request, and PEBA shall have no duty to report on the value of such investments.

Percy E. Bolton Associates, Inc. does not receive any client referrals from a broker-dealer or third party.

PEBA suggest clients to use SEI Private Trust Company as their custodian in order for PEBA to safeguard and monitor their accounts. PEBA safeguard clients' assets at SEI Private Trust Company (PTC). Many of the communications the client receive from PEBA will come from SEI Private Trust Company (SPTC), which is a wholly owned subsidiary of SEI. As a trust institution, SPTC segregates clients' assets from its own assets and holds them as custodian. Assets held in accounts at a trust company are not assets of the trust company. Therefore, trust company creditors have no claim to such assets. Clients' investments are held in the client's name at SPTC. The company may not pledge, hypothecate or margin assets that it holds in custody.

### Item 13 Review of Accounts

PEBA conduct a review of a client's investments as part of both of our Services. The frequency and level of detail of these reviews will vary, depending upon each client's needs and objectives. The reviewer is Percy E. Bolton.

They are conducted at least once annually, and when triggered by a material change in the underlying investments or a change in the client's personal circumstances. We rely on our clients to notify us of changes in their personal circumstances, employer-provided retirement investments, or investments.

Upon termination of our engagement, we will not contact the client concerning their investment or our financial recommendations. It is the client's responsibility to continually monitor the components of their plan, including

their investments. They should review their investments when there are changes in the underlying investments, their investment objectives or financial circumstances.

Clients receive updated exhibits on an ongoing basis and as needed basis to reflect changes in clients' personal circumstances and financial information. To the extent that there have been changes in the underlying information, clients are provided with an updated exhibit at least annually.

The client will receive monthly statements from the SEI Private Trust Company indicating holdings. A quarterly report, indicating market value, cash flows, gains and losses, asset allocation and performance as it relates to market indices, is also available if the client elects to receive it. Annually, the client will receive a tax report for the account. PEBA recommends that clients review these at least quarterly to make sure all activity is authorized and correct.

#### **Item 14 Client Referral and Other Compensation**

Percy E. Bolton Associates, Inc. has no relationship with anyone who is not a client that provides an economic benefit to us for providing investment advice or other advisory services. Percy E. Bolton Associates, Inc. does not directly or indirectly compensate any person for client referrals.

#### **Item 15 Custody**

Percy E. Bolton Associates, Inc. does not have custody of client funds or securities; thus this item is not applicable.

#### **Item 16 Investment Discretion**

Percy E. Bolton Associates, Inc. operates strictly on a non-discretionary basis. The agreement the client signs with PEBA provides for non-discretionary authority. It is the policy of Percy E. Bolton Associates, Inc. to require prior approval from the client for all transactions within the account.

#### **Item 17 Voting Client Securities**

Percy E. Bolton Associates, Inc. does not have, nor will accept authority to vote client securities. Client receives proxies and other solicitations directly from

custodian. All questions regarding solicitations and proxies are directly addressed to the custodian.

#### **Item 18 Financial Information**

Because PEBA does not require prepayment of services six months or more in advance, this item is not applicable.

Percy E. Bolton Associates, Inc.

Office Address:

1122 East Green Street  
Pasadena, CA 91106

Mailing Address:

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Pasadena, CA 91106

[www.percybolton.com](http://www.percybolton.com)

Office: 626-356-9660

Dated: March 25, 2026

Form ADV Part 2B – Brochure Supplement

For

Percy Bolton -Individual CRD# 724867

Managing Director, and Chief Compliance Officer

This brochure provides information about Percy Bolton that supplements the Percy E. Bolton Associates, Inc.'s brochure. A copy of that brochure precedes this supplement. Please contact Percy Bolton if the Percy E. Bolton Associates, Inc.'s brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Percy E. Bolton Associates, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational and Business Experience of Percy E. Bolton

Percy E. Bolton

Born: 1949

### Education

- Certified Financial Planner (CFP®), 1984
- University of California, Los Angeles (UCLA), BA in History, 1972
- University of California, Los Angeles (UCLA), MA in History, 1975
- University of California, Los Angeles (UCLA) Advance to Candidacy for PHD in History, 1977

### Business Experience

- 11/1986-present Managing Director, Percy E. Bolton Associates, Inc.
- 9/1984-11/1986 Southmark Financial Services, Branch Manager (Series 72)
- 12/1981-9/1984 University Securities Corporation, Registered Representative (Series 7)

### Professional Designations, Licensing & /Exams

The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is issued by the Certified Financial Planner Board of Standards, Inc. Candidates are tested on over 100 topics, including financial planning, insurance, investment planning, retirement, and estate planning. A CFP® professional is qualified to provide financial advice and make financial decisions for clients seeking their expertise. Maintaining the certification requires continuing education, including ethics training.

The CFP® certification is voluntary and not mandated by federal or state law or regulation. It is recognized in the United States and several other countries for its high standard of professional education, stringent code of conduct and standards of practice, and ethical requirements. Over 105,000 individuals currently hold the CFP® certification in the United States.

#### CFP® Certification Requirements

- **Education:** Complete an advanced college-level course of study in financial planning subject areas as determined by the CFP Board. Attain a bachelor's degree from a regionally accredited U.S. college or university (or its equivalent from a foreign university). Subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- **Examination:** Pass the comprehensive CFP® Certification Examination, administered over six hours in two days, including case studies and client scenarios to test the candidate's ability to diagnose financial planning issues and apply knowledge to real-world circumstances.
- **Experience:** Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- **Ethics:** Agree to be bound by the CFP Board's Standards of Professional Conduct, which outline the ethical and practice standards for CFP® professionals.

#### Ongoing Requirements for CFP® Professionals

- **Continuing Education:** Complete 30 hours of continuing education every two years, including two hours focused on the Code of Ethics and Standards of Professional Conduct, to maintain competence and stay current with developments in the field.
- **Ethics:** Renew an agreement to be bound by the Standards of Professional Conduct. CFP® professionals are required to provide financial planning services at a fiduciary standard of care, acting in the best interests of their clients.

Failure to comply with these standards and requirements may lead to enforcement actions by the CFP Board, which could result in suspension or permanent revocation of the CFP® certification.

## Item 3 Disciplinary Information

No management person at Percy E. Bolton Associate, Inc has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4 Other Business Activities

Percy E. Bolton is not involved with outside business activities

## Item 5 Additional Compensation

Percy E. Bolton does not receive any economic benefit from any person, company, or organization, in exchange for providing advisory services through Percy E. Bolton Associates, Inc.

## Item 6 Supervision

Percy Bolton, as Managing Director and Chief Compliance Officer of Percy E. Bolton is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## Item 7 Requirements for State-Registered Advisors

Percy E. Bolton has never been involved in an arbitration claim of any kind, been found liable in a civil, self-regulatory organization or administrative proceeding, or been the subject of a bankruptcy petition.