

Item 1 Cover Page

A.

Thomas H. Ruggie

Destiny Wealth Partners, LLC

Brochure Supplement
Dated February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Drive
Tavares, Florida 32778

B.

This Brochure Supplement provides information about Thomas H. Ruggie that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas H. Ruggie is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Thomas H. Ruggie was born in 1968. Mr. Ruggie graduated from University of Central Florida in 1991, with a Bachelor Science degree in Business/ Finance and from Valencia College with an Associate's degree. From July 2018 through July 2020 Mr. Ruggie was an investment adviser representative with CWM, LLC. Mr. Ruggie has been an investment adviser representative and Managing Member of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC) since July 2014. From December 1996 through January 2021, Mr. Ruggie was also the owner and an investment adviser of Ruggie Capital Group, Inc. From February 2013 through October 2020, Mr. Ruggie was an investment adviser representative of Asset Advisors of America, LLC. From June 2010 through August 2019, Mr. Ruggie was a consultant with 401K Generation. From November 2010 through June 2014, Mr. Ruggie was an investment adviser representative of 401K Generation. Mr. Ruggie was a registered representative of Purshe Kaplan Sterling from June 2010 through October 2016. From March 2009 through April 2010, Mr. Ruggie was an

investment adviser representative with RWE Private Wealth. From May 2004 through September 2009, Mr. Ruggie was a registered representative of LPL.

Mr. Ruggie has been a CERTIFIED FINANCIAL PLANNER™ since 1998.

Mr. Ruggie 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.
- **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. Ruggie has held the designation of Chartered Financial Consultant (ChFC®) since 1998. The ChFC® designation has been a mark of excellence for forty years and currently requires eight college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

Mr. Ruggie's annual compensation is based, in part, on the amount of assets under management that Mr. Ruggie introduces to the Registrant. Accordingly, Mr. Ruggie has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the

recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Morgan A. Hatfield

Destiny Wealth Partners, LLC

Brochure Supplement
Dated February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Drive
Tavares, Florida 32778

B.

This Brochure Supplement provides information about Morgan A. Hatfield that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Morgan A. Hatfield is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Morgan A. Hatfield was born in 1985. Ms. Hatfield graduated from Lake Sumter Community College with an Associate's degree and the University of Central Florida with a Bachelor of Science degree in Finance. From July 2018 through July 2020, Ms. Hatfield was an investment adviser representative with CWM, LLC. From December 2010 through January 2021, Ms. Hatfield was a Senior Advisor of Ruggie Capital Group, Inc. Ms. Hatfield has been an investment adviser representative with Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC) since April 2015. From June 2008 through December 2010, Ms. Hatfield was a Financial Assistant with Ruggie Capital Group, Inc.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

Ms. Hatfield's annual compensation is based, in part, on the amount of assets under management that Ms. Hatfield introduces to the Registrant. Accordingly, Ms. Hatfield has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

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Item 1 Cover Page

A.

Robert Liddell Clark, Jr.

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Dr.
Tavares, FL 32778

B.

This Brochure Supplement provides information about Robert Liddell Clark, Jr. that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Liddell Clark, Jr. is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Robert Liddell Clark, Jr. was born in 1970. Mr. Clark graduated from the University of Central Florida with a Bachelor of Arts degree in Hospitality Management. From July 2018 through July 2020, Mr. Clark was an investment adviser representative with CWM, LLC. From April 2017 through January 2021, Mr. Clark was a Partner of Ruggie Capital Group, Inc. and is currently a Partner and a registered investment adviser of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC). From May 2011 through March 2017, Mr. Clark was a Financial Advisor with MPC. From 2012 through 2017, he was an investment adviser representative of Independent Financial Partners and a registered representative of LPL Financial.

Mr. Clark has been a CERTIFIED FINANCIAL PLANNER™ since 2005.

Mr. Clark 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.

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- **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.
- **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.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. Mr. Clark, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Clark to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Clark that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Clark. Clients are reminded that they may purchase insurance products recommended by Mr. Clark through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Thomas H. Ruggie, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

Mr. Clark's annual compensation is based, in part, on the amount of assets under management that Mr. Clark introduces to the Registrant. Accordingly, Mr. Clark has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Louis M. Shinaman

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Dr.
Tavares, FL 32778

B.

This Brochure Supplement provides information about Louis M. Shinaman that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Louis M. Shinaman is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Louis M. Shinaman was born in 1971. Mr. Shinaman graduated in 1995 from Valencia College with an Associate's degree. From March 2011 through January 2021, Mr. Shinaman was a Financial Consultant of Ruggie Capital Group, Inc. and since October 2016, Mr. Shinaman has been a Financial Consultant of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC). From July 2018 through July 2020, Mr. Shinaman was an investment adviser representative with CWM, LLC. Mr. Shinaman was a registered representative of Purshe Kaplan Sterling from March 2011 through October 2016. From December 2008 through April 2010, Mr. Shinaman was a Financial Advisor with Broker Express.

Mr. Shinaman has held the designation of Chartered Financial Consultant (ChFC®) since 2014. The ChFC® designation has been a mark of excellence for forty years and currently requires eight college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application

training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Mr. Shinaman has held the professional designation of a CEP® (Certified Estate Planner) since 2015. The CEP® (Certified Estate Planner) certification is a federally registered trademark of the National Institute of Certified Estate Planners (NICEP). The NICEP is the sole owner and conveyor of the mark and reserves the right to suspend or revoke the use of this professional certification.

Certification: Certified Estate Planner (CEP®). Issuing Organization: National Institute of Certified Estate Planners (NICEP). Prerequisites/Experience Required: Candidates for this course must hold a valid current license in either the financial, legal, or tax profession, and be in good standing with all relevant licensing bodies and regulatory or compliance related governing bodies. Educational Requirements: Candidates must complete a comprehensive interactive discussion of the course highlights done either live or online, displaying an understanding of the course material through case studies and diagrams, in combination with reading and understanding significant self study materials. Candidates spend an average of 5 - 6 months of combined study and preparation between the live online sessions and self-study materials (often requiring repeated attendance in live training and exam retakes), then successfully pass a rigorous qualifying proctored exam from a bank of 280 exam questions in which the student must demonstrate a competent grasp of the subject matter. Continuing Education: Completion of a minimum of eight (8) hours every two (2) years, specifically in the area of estate planning. Professional Ethics: Adherence to the NICEP Professional Code of Ethics which governs both professional conduct and industry compliance.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. **Licensed Insurance Agent**. Mr. Shinaman, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Shinaman to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Shinaman that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is

under any obligation to purchase any insurance commission products from Mr. Shinaman. Clients are reminded that they may purchase insurance products recommended by Mr. Shinaman through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Thomas H. Ruggie, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

Mr. Shinaman's annual compensation is based, in part, on the amount of assets under management that Mr. Shinaman introduces to the Registrant. Accordingly, Mr. Shinaman has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

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Item 1 Cover Page

A.

Jorge A. Romero

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Dr.
Tavares, FL 32778

B.

This Brochure Supplement provides information about Jorge A. Romero that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jorge A. Romero is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Jorge A. Romero was born in 1982. Mr. Romero graduated from the University of Central Florida with a Bachelor of Arts degree in Political Science and Pre-Law and from Golden Gate University with a Master of Science degree in Financial Planning and Taxation. From March 2015 through January 2021, Mr. Romero was a Senior Wealth Advisor of Ruggie Capital Group, Inc. and since October 2016, Mr. Romero has been a Senior Wealth Advisor of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC). From July 2018 through July 2020, Mr. Romero was an investment adviser representative with CWM, LLC. From November 2007 through March 2015, Mr. Romero was a Financial Consultant with SunTrust Investment Services.

Mr. Romero has been a CERTIFIED FINANCIAL PLANNER™ since 2014.

Mr. Romero 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.

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- **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.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

Mr. Romero's annual compensation is based, in part, on the amount of assets under management that Mr. Romero introduces to the Registrant. Accordingly, Mr. Romero has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

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Item 1 Cover Page

A.

Audrey M. Ralicki

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer

2100 Lake Eustis Dr.

Tavares, FL 32778

B.

This Brochure Supplement provides information about Audrey M. Ralicki that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Audrey M. Ralicki is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Audrey M. Ralicki was born in 1986. Ms. Ralicki graduated from the University of North Florida with a Bachelor of Science degree in Finance. From August 2011 through January 2021, Ms. Ralicki was an Associate Advisor of Ruggie Capital Group, Inc. and since October 2016, Ms. Ralicki has been an Associate Advisor of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC). From October 2019 through July 2020, Ms. Ralicki was an investment adviser representative with CWM, LLC. From October 2008 through August 2011, Ms. Ralicki was an Administrative Assistant with Sagepoint Financial.

Ms. Ralicki has been a CERTIFIED FINANCIAL PLANNER™ since 2019.

Ms. Ralicki 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

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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. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

Item 5 Additional Compensation

Ms. Ralicki's annual compensation is based, in part, on the amount of assets under management that Ms. Ralicki introduces to the Registrant. Accordingly, Ms. Ralicki has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Carol Ann Mulcahy

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Dr.
Tavares, FL 32778

B.

This Brochure Supplement provides information about Carol Ann Mulcahy that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Carol Ann Mulcahy is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Carol Ann Mulcahy was born in 1961. Ms. Mulcahy graduated in 1997 from Lesley University with a Bachelor of Science degree in Business Management. From February 2019 through January 2021, Ms. Mulcahy was a Senior Wealth Advisor of Ruggie Capital Group, Inc. Ms. Mulcahy has been a Senior Wealth Advisor with Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC) since May 2020. From May 2019 through July 2020, Ms. Mulcahy was an investment adviser representative with CWM, LLC. From July 2014 through December 2017, Ms. Mulcahy was an Investment Consultant with The Investment Counsel Company. From February 2014 through July 2014, Ms. Mulcahy was an Advisor and Professional Speaker with First Command Financial Planning, Inc.

Ms. Mulcahy has held the designation of Chartered Retirement Plans SpecialistSM (CRPS) since 6/28/2008. 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.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Kimberly C. Good

Destiny Wealth Partners, LLC

Brochure Supplement
Dated February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Drive
Tavares, Florida 32778

B.

This Brochure Supplement provides information about Kimberly C. Good that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Kimberly C. Good is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Kimberly C. Good was born in 1960. Ms. Good graduated from Bowling Green State University with a Bachelor of Arts degree in Music Education. Ms. Good has been the President of KCG Investment Advisory Services LLC since January 2011. Ms. Good has also been a Partner and Senior Wealth Advisor with Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC) since January 2021.

Ms. Good has held the designation of Certified Private Wealth Advisor (CPWA[®]) since 2020. The CPWA[®] designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on management topics and strategies for high-net-worth clients. The designation is administered through Investments & Wealth Institute[™]. Prerequisites for the CPWA[®] designation include a Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA[®], RMA[®], CFA[®], CFP[®], ChFC[®] or CPA license; five

years of experience in financial services; and successfully complete a comprehensive background check. CPWA[®] coursework can be completed through a combination of self-study and in-person executive education, or completely online. Candidates must complete the CPWA[®] Certification Exam, a 4 hour-long, computer-based examination. CPWA[®] certified professionals are required to adhere to the Investments & Wealth Institute's Code of Professional Responsibility. CPWA[®] certified professionals must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Ms. Good has held the Certified Investment Management Analyst[®] designation since 2013. The CIMA[®] certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. The designation is administered through the Investments & Wealth Institute[®]. Prerequisites for the CIMA[®] certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA[®] certification, candidates must complete an executive education program through a registered education provider and pass a comprehensive certification exam. CIMA[®] designees are required to adhere to the Investments & Wealth Institute's[®] Code of Professional Responsibility and the appropriate use of the certification marks. CIMA[®] designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Ms. Good has been a CERTIFIED FINANCIAL PLANNER[™] professional since 1988.

Ms. Good 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.
- **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. Good has held the designation of Chartered Financial Consultant (ChFC®) since 1997. The ChFC® designation has been a mark of excellence for forty years and currently requires eight college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Ms. Good has held the designation of Chartered Life Underwriter (CLU®) since 1996. Since 1927, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses representing an average study time of 400 hours. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College, a non-profit educator with the top level of academic accreditation.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Other Investment Adviser Firm.** Ms. Good, also serves as the owner and an investment adviser representative of KCG Investment Advisory Services LLC (CRD# 150083), an unaffiliated state registered investment advisor firm.
- B. **Licensed Insurance Agent.** Ms. Good, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Good to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Ms. Good that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Good. Clients are reminded that they may purchase insurance products recommended by Ms. Good through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Thomas H. Ruggie, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

Ms. Good's annual compensation is based, in part, on the amount of assets under management that Ms. Good introduces to the Registrant. Accordingly, Ms. Good has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

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

questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Mark L. Dickerson

Destiny Wealth Partners, LLC

ADV Part 2B, Brochure Supplement

Dated: February 15, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer

2100 Lake Eustis Dr.

Tavares, FL 32778

B.

This Brochure Supplement provides information about Mark L. Dickerson that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Mark L. Dickerson is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Mark L. Dickerson was born in 1958. Mr. Dickerson graduated from West Virginia University with a Bachelor of Science degree in Business Administration. Mr. Dickerson has been a Senior Associate Advisor of Destiny Wealth Partners, LLC (fka RWM Asset Management, LLC) since January 2022. From August 2018 through January 2022, Mr. Dickerson was registered representative of Ameriprise Financial Services Inc. From April 2014 through August 2018, Mr. Dickerson was a registered representative of FSC Securities Corporation.

Mr. Dickerson has been a CERTIFIED FINANCIAL PLANNER™ since 2007.

Mr. Dickerson 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.
- **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. Dickerson has held the designation of Chartered Financial Consultant (ChFC®) since May 2021. The ChFC® designation has been a mark of excellence for forty years and currently requires eight college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential

is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

Mr. Dickerson has held the designation of Certified Divorce Financial Analyst® (CDFA®) since 2022. The Certified Divorce Financial Analyst® (CDFA®) designation is issued by The Institute for Divorce Financial Analysts (IDFATM), 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, IDFATM provides specialized training to accounting, financial, and legal professionals in the field of pre-divorce financial planning. Over the years, IDFATM has certified more than 5,000 professionals in the U.S. and Canada as Certified Divorce Financial Analysts® (CDFAs®). The CDFAs® designation is available to individuals who have a minimum of three years experience as a financial professional, accountant, or matrimonial lawyer. To acquire the designation, 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.

To earn the designation, the participant must complete a series of self-study course modules and pass an examination for each module. The American module topics are:

- Financial and legal issues of divorce
- Advanced financial issues of divorce
- Tax issues of divorce
- Working as a CDFAs: case studies

Continuing Education (CE)

To retain the Certified Divorce Financial Analyst® designation, a CDFAs® must obtain thirty divorce-related hours of Continuing Education (CE) every two years, remain in good standing with the IDFATM, and keep his/her dues current.

To learn more about the CDFAs® designation, visit <http://www.institutedfa.com/>.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. The supervised person is not actively engaged in any investment-related business or occupation for compensation.
- B. **Licensed Insurance Agent.** Mr. Dickerson, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Dickerson to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Dickerson that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions

may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Dickerson. Clients are reminded that they may purchase insurance products recommended by Mr. Dickerson through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Thomas H. Ruggie, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

Mr. Dickerson's annual compensation is based, in part, on the amount of assets under management that Mr. Dickerson introduces to the Registrant. Accordingly, Mr. Dickerson has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.

Item 1 Cover Page

A.

Christopher G. Nichols

Destiny Wealth Partners, LLC

Brochure Supplement

Dated January 1, 2023

Contact: Thomas H. Ruggie, Chief Compliance Officer
2100 Lake Eustis Drive
Tavares, Florida 32778

B.

This Brochure Supplement provides information about Christopher G. Nichols that supplements the Destiny Wealth Partners, LLC Brochure; you should have received a copy of that Brochure. Please contact Thomas H. Ruggie, Chief Compliance Officer, if you did *not* receive Destiny Wealth Partners, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher G. Nichols is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Christopher G. Nichols was born in 1976. Mr. Nichols graduated from the University of Florida with a Bachelor of Arts degree in Marketing. From June 2014 through December 2022, Mr. Nichols was an investment adviser representative with CWM, LLC

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

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

Item 5 Additional Compensation

Mr. Nichols' annual compensation is based, in part, on the amount of assets under management that Mr. Nichols introduces to the Registrant. Accordingly, Mr. Nichols has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Thomas H. Ruggie, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Ruggie at 352-343-2700.