

flexPATH Strategies LLC

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December 1, 2025

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of flexPATH Strategies, LLC, a registered investment adviser with the Securities and Exchange Commission. Any questions about the contents of this brochure please contact us at 949-418-6030. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about flexPATH Strategies is available on the SEC's website at www.adviserinfo.sec.gov. The IARD/CRD number for flexPATH Strategies is 174306.

Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

In this "Summary of Material Changes" the Advisor discusses only the material changes since the last annual update of this brochure in March 2024.

Since the filing of our last annual updating amendment, dated March 22, 2024, and as of 11/14/2025, flexPATH is no longer sub-advising Collective Investment Trusts for which Great Gray Trust Company ("Great Gray") is the trustee, as Great Gray and its affiliates have purchased the assets flexPATH used to conduct that sub-advisory business as well as hired certain flexPATH employees. flexPATH will continue to provide 3(38) services to retirement plans.

Item 3 Table of Contents

Item 1 Cover Page	Page 1
Item 2 Summary of Material Changes	Page 2
Item 3 Table of Contents	Page 3
Item 4 Advisory Business	Page 4
Item 5 Fees and Compensation	Page 4
Item 6 Performance-Based Fees and Side-By-Side Management	Page 5
Item 7 Types of Clients	Page 5
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	Page 5
Item 9 Disciplinary Information	Page 7
Item 10 Other Financial Industry Activities and Affiliations	Page 7
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 7
Item 12 Brokerage Practices	Page 7
Item 13 Review of Accounts	Page 8
Item 14 Client Referrals and Other Compensation	Page 8
Item 15 Custody	Page 8
Item 16 Investment Discretion	Page 8
Item 17 Voting Client Securities	Page 8
Item 18 Financial Information	Page 8

Item 4 Advisory Business

General Description of Advisor

flexPATH Strategies, LLC is federally registered as an investment adviser with the Securities and Exchange Commission (referred to in this brochure as "we", "Advisor" or "flexPATH Strategies") under the Investment Advisers Act of 1940, as amended ("Advisers Act"). Advisor is organized as a Delaware limited liability company. Registration does not imply a certain level of skill or training.

General Description of Services

flexPATH provides **3(38) investment manager services for ERISA plans.**

Services Include:

- Creating and maintaining an Investment Policy Statement (IPS).
- Selecting, monitoring, and, if necessary, replacing the plan's investment options to ensure diversification and reasonable fees.
- Providing regular performance reports to the plan sponsor.

Fiduciary Role under ERISA

In providing investment management services to retirement plans, the Advisor acknowledges that it is a fiduciary and investment manager under section 3(38) of ERISA and a Qualified Professional Asset Manager under ERISA. flexPATH Strategies provides 3(38) investment management services to plans for a fee.

Investment Advice Assets

As of November 14, 2025, we provide continuous management services for \$2,700,000,000 in client assets on a discretionary basis.

Item 5 Fees and Compensation

The specific fees that Advisor charges a retirement plan will be set forth in the client's written investment management agreement with Advisor and are typically between 5 to 15 basis points on the assets under management. Advisor generally bills its advisory fees on a quarterly basis in advance unless otherwise agreed to with a client. Clients also may be billed directly for fees or authorize Advisor to directly debit fees from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable. Any fees paid in advance that are unearned shall be returned to the client prorated to the date of termination.

Other Fees

Advisor invest assets with other managers and advisers through non proprietary collective investment funds, mutual funds, target date funds and other managed products or partnerships. Clients are charged for the services by the managers and providers of these products in addition to the service fees paid to the Advisor. The fees and expenses charged are separate and distinct from the management fee charged by the Advisor. These fees and expenses are described in each fund's prospectus or offering memorandum. These fees will generally include a management fee, other fund expenses and a possible distribution fee. Accordingly, the client should review both the fees charged by the funds and the applicable fee charged by the Advisor to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

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

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7 Types of Clients

Advisor provides investment advisory services primarily to pension and profit-sharing plans.

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

Method of Analysis and Investment Strategies

The Advisor primarily uses quantitative and qualitative analysis in evaluating other managers and advisors for its services. The primary investment strategies utilized are passive (index), actively managed and asset allocation through other managers and collective investment funds. Managers and collective Funds utilized are diversified to mitigate the risk associated with the capital markets. The Advisor's strategies do not involve frequent trading.

Risk of Loss

Any investment or investment strategy involves some risk of loss a client should be prepared to bear. Examples of such risks are:

Interest-rate Risk: Fluctuations in interest rates may cause investment values to fluctuate. For example, market values of bonds typically decline when interest rates rise, because the rising rate makes the existing bond yields less attractive.

Market Risk: External factors independent of a security's particular underlying circumstances may impact its value. The value of a security, bond or mutual fund may drop in reaction to tangible and intangible events and conditions, such as a political or social event or an economic condition.

Inflation Risk: Inflation means a dollar today may buy more than a dollar next year. When inflation is present, purchasing power typically decreases at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. Also known as exchange rate risk, these risks may be present in international mutual funds for example.

Reinvestment Risk: The risk that future proceeds from investments may be reinvested at a potentially lower rate of return is reinvestment risk. This risk primarily relates to fixed income securities.

Business Risk: Risks associated with a particular industry, or a specific company may impact the value of investments.

Liquidity Risk: Liquidity means the ability to readily convert an investment into cash. Assets with many purchasers are generally more liquid. For example, Treasury Bills are highly liquid, while real estate properties are less so.

Financial Risk: A company with excessive borrowing or that takes significant business risks to generate profit is typically at a greater risk of financial difficulty or failure.

Accuracy of Public Information: The Advisor selects other managers and investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Advisor by the issuers or through sources other than the issuers. Although the Advisor evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Advisor is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not available.

Investments in Non-US. Investments: From time to time, the Advisor may provide investment advice in non-U.S. securities and other assets (through other managers, mutual funds and otherwise), which will give rise to risks relating to political, social and economic developments abroad, as overall as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include: political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets. Enforcing legal rights in some foreign countries is difficult, costly and slow, and there are sometimes special problems enforcing claims against foreign governments.

Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Advisor may provide advice on foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the client's asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the client's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the client's foreign currency holdings. If the client enters into forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the client enters forward contracts for the purpose of increasing return, it may sustain losses.

Non-U.S. securities, commodities and other markets may be less liquid, more volatile and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

Other Investment Manager and Fund of Funds Risk: The investment performance of a portfolio that is managed by another investment adviser, or included within a fund-of-funds is affected by the investment performance of the underlying securities and funds which the manager chooses or in which the portfolio invests. The ability to achieve the investment objective depends on the ability of the chosen manager or underlying funds, as applicable, to meet their investment objectives and on Advisor's decisions regarding the allocation of assets among the underlying managers and funds. The chosen manager or portfolio may allocate assets to an underlying fund or asset class that underperforms other funds or asset classes. There can be no assurance that the investment objective of the manager, portfolio or any underlying fund will be achieved. When a manager or the portfolio invests in underlying funds, investors are exposed to a proportionate share of the expenses of those underlying investments in addition to the expenses of manager or the portfolio. Through its investments in underlying funds, the portfolio is subject to the risks of the underlying funds' investments.

Clients should carefully review the fund's prospectus, offering document or Trust agreement, as applicable, and any corresponding investment management agreement for additional information on investment strategies and risks.

Item 9 Disciplinary Information

Neither Advisor nor its employees have been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

flexPATH has no other financial activities or affiliates.

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

Code of Ethics

The Advisor has adopted a Code of Ethics which establishes standards of conduct for its supervised persons. The Code of Ethics includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. It requires supervised persons to report their personal securities transactions and holdings quarterly to the Advisor's Compliance Officer and requires the Compliance Officer to review those reports. It also requires supervised persons to report any violations of the Code of Ethics promptly to the Advisor's Compliance Officer. Each supervised person of the Advisor receives a copy of the Code of Ethics and any amendments to it and must acknowledge in writing having received the materials. Annually, each supervised person must certify that he or she complied with the Code of Ethics during that year. Clients and prospective clients may obtain a copy of the Adviser's Code of Ethics by contacting the Compliance Officer of the Advisor.

Participation or Interest in Client Transactions

Under the Adviser's Code of Ethics, the Advisor and its managers, members, officers and employees may invest personally in securities of the same classes as are purchased for clients and may own securities of the issuers whose securities are subsequently purchased for clients. If an issue is purchased or sold for clients and any of the Advisor, managers, members, officers and employees on the same day purchase or sell the same security, either the clients and the Advisor, managers, members, officers or employees shall receive or pay the same price or the clients shall receive a more favorable price. The Advisor and its managers, members, officers and employees may also buy or sell specific securities for their own accounts based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

Personal Trading

The Chief Compliance Officer reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

Item 12 Brokerage Practices

Since Advisor mainly provides investment advice by allocating assets to other third-party investment advisers and managers within funds on a recordkeeping platform, it does not select or recommend broker-dealers in connection with these services.

Item 13 Review of Accounts

Advisor conducts reviews, as applicable, on a periodic basis depending on the arrangement, typically quarterly. All reviews use similar factors incorporating comprehensive criteria such as but not limited to overall market changes as related to performance, risk/return analysis, style analysis, and changes in the investment objectives/ portfolio management. Reviews typically include the monitoring of investment managers on a quarterly basis where minimum criteria must be met to be considered acceptable.

Reports for any individual clients will be individualized, thereby the nature and frequency are to be determined by client need and the services offered by Advisor.

Item 14 Client Referrals and Other Compensation

Certain employees and owners of flexPATH have made minority equity investments in the parent holding company of Great Gray Trust Company. flexPATH can choose Great Gray Trust Company CITs as part of the asset allocation of retirement plan assets that flexPATH manages. This presents a conflict of interest. These employees /owners of flexPATH receive no direct compensation for allocations to Great Gray Trust Company CITs for flexPATH's 3(38) clients, however they have the potential to indirectly benefit from Great Gray Trust Company's success.

Item 15 Custody

Advisor does not have custody of client assets. All assets in client accounts shall be held for safekeeping with a designated custodian as selected by the client. Advisor shall not act as custodian for any assets in the client's account and shall not take possession of cash and/or securities of the Client's account.

Item 16 Investment Discretion

Advisor receives discretionary authority from a client pursuant to an investment management agreement, or other engagement document at the outset of an advisory relationship. Advisor observes the investment policies, limitations, and restrictions of the clients for which it advises when creating an asset allocation for the plan. In all cases such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client.

Item 17 Voting Client Securities

Since Advisor mainly provides investment advice on allocating assets to other third-party investment advisers and managers, it does not vote proxies of securities. Further, Advisor typically will not agree to accept authority to vote proxies for a client. The client will be responsible for receiving and voting proxies for any and all securities maintained in client portfolios, and Advisor is not responsible for forwarding proxies to the client. Depending on the circumstances and the terms of the client's agreement, Advisor may provide advice about a proxy from time to time.

Item 18 Financial Information

The Advisor does not have any financial impairment that will preclude the Advisor from meeting contractual commitments to clients. The Advisor meets all net capital requirements that it is subject to, and the Advisor has not been the subject of a bankruptcy petition.

The Advisor is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

flexPATH Strategies Privacy Policy

flexPATH Strategies and its employees are committed to protecting your privacy and to safeguarding client information.

Safeguarding Client Documents

flexPATH Strategies uses encryption technologies on all electronic mail communications, mobile devices and laptops, wireless access and on servers, when the circumstances allow and dictate. In addition, flexPATH Strategies maintains a cyber-liability policy. We collect non-public client data in checklists, forms, in written notations, and in documentation provided to us by our clients for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours access to client records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the client records will be locked. No individual who is not so authorized shall obtain or seek to obtain personal and financial client information.

No individual with authorization to access personal and financial client information shall share that information in any manner without the specific consent of a Firm principal. Failure to observe flexPATH Strategies procedures regarding client and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

flexPATH Strategies is committed to the protection and privacy of its clients' and consumers' personal and financial information. flexPATH Strategies will not share such information with any affiliated or nonaffiliated third party except:

- When required to maintain or service a client account;
- To resolve client disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of flexPATH Strategies' business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide Advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the client's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Opt-Out Provisions

It is not a policy of flexPATH Strategies to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.

Business Continuity Plan

flexPATH Strategies has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us

If after a significant business disruption the client cannot contact us as the client usually does the client should call the Adviser's alternative number 949.418.6030 or access the Adviser web address <https://www.flexpathstrategies.com/>

Our Business Continuity Plan

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data back-up and recovery, all mission critical systems, financial and operational assessments, alternative communications with customers, employees, and regulators, alternate physical location of employees, critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Varying Disruptions

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover within 24 hrs. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume businesses in a timely fashion with emphasis on recovery of critical functions according to their time criticality. In either situation, we plan to continue in business and notify you through our web site or direct email regarding how you may contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will ensure our customers' prompt access to their funds and securities.

For More Information

If you have questions about our business continuity planning, you can contact us at 949-418-6030.

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FORM ADV BROCHURE - PART 2B

Last updated: December 1, 2025

This brochure provides information about principals and adviser representatives of flexPATH Strategies, LLC and this brochure supplements the flexPATH Strategies, LLC brochure. The client should have received a copy of that brochure. Please contact Monique Schulman at 603-216-8894 or by email monique.schulman@acaglobal.com if the client did not receive the flexPATH brochure or if the client has any questions about the contents of this supplement. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about the Advisor and its investment advisory representatives is available on the SEC's website at www.adviserinfo.sec.gov.

Jeffrey Elvander, Chief Investment Officer

Year of Birth: 1969

Education: MBA, Pepperdine University, 2001
B.A. Business Economics, UCSB, 1993

Professional Designation(s):

The Chartered Financial Analyst (CFA®) and Certification Mark (collectively, the "CFA marks") are professional certification marks granted in the United States and internationally by the CFA Institute.

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

There are currently more than 150,000 CFA charterholders working in more than 140 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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

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

Employment for the Past Five Years

Employment Dates: 08/2023 to Present
Firm Name: flexPATH Strategies
Type of Business: Investment Advisor
Job Title & Duties: Chief Investment Officer

Employment Dates: 01/2015 to Present
Firm Name: flexPATH Strategies
Type of Business: Investment Advisor
Job Title & Duties: Senior Vice President, CIO

Employment Dates: 02/2014 to Present
Firm Name: RPAG
Type of Business: Technology Company
Job Title & Duties: Chief Investment Officer

Employment Dates: 07/2006 to 05/2023
Firm Name: NFP Retirement Inc.
Type of Business: Investment Advisor
Job Title & Duties: Senior Vice President, CIO

Employment Dates: 07/2014 to 03/2017
Firm Name: Kestra Investment Services, LLC
Type of Business: Broker Dealer
Job Title & Duties: Registered Representative

Employment Dates: 12/2004 to 07/2014
Firm Name: Financial Telesis Inc.
Type of Business: Broker Dealer and Investment Advisor
Job Title & Duties: Registered Representative

Items 3 & 7 - Disciplinary Information

As it relates to past, current or prospective clients, Jeffrey Elvander has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition

Item 4 - Other Business

Jeffrey Elvander is Chief Investment Officer of RPAG, a technology company. Mr. Elvander's duties as the Chief Investment Officer of RPAG do not create a conflict of interest to his provision of advisory services through flexPATH Strategies.

Item 5 - Additional Compensation

None

Item 6 - Supervision

Jeffrey Elvander is supervised by Monique Schulman, Chief Compliance Officer.

Monique Schulman's contact information: 603-216-8894

monique.schulman@acaglobal.com

Lauren Neeno, Senior Investment Consultant

Year of Birth: 1996

Education: Chapman University, Orange

Professional Designations: N/A

Employment for the Past Five Years

Employment Dates: 04/2022 to Present
Firm Name: flexPATH Strategies
Type of Business: Investment Advisor
Job Title & Duties: Investment Adviser Representative

Employment Dates: 08/2018 to 04/2022
Firm Name: flexPATH Strategies
Type of Business: Investment Advisor
Job Title & Duties: Senior Service Coordinator

Employment Dates: 06/2017 to 08/2017
Firm Name: NFP Retirement/flexPATH
Type of Business: Investment Advisor
Job Title & Duties: INTERN

Employment Dates: 08/2014 to 12/2017
Firm Name: Chapman University, Orange, CA
Type of Business: University
Job Title & Duties: Student

Items 3 & 7 - Disciplinary Information

As it relates to past, current or prospective clients, Lauren Neeno has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

Item 4 - Other Business Activities

None

Item 5 - Additional Compensation

None

Item 6 - Supervision

Lauren Neeno is supervised by Monique Schulman, Chief Compliance Officer
Monique Schulman's contact information: 603-216-8894
monique.schulman@acaglobal.com

Brian Roberts, Senior Vice President**Year of Birth:** 1963**Education:** Davidson College, B.A. Economics with honors 1986

Professional Designations:

CFA®: The Chartered Financial Analyst® designation is a graduate-level investment credential awarded by the CFA Institute. Successful candidates must have a bachelor's degree from an accredited institution or equivalent educational or work experience, pass three sequential six-hour uniform examinations that demonstrate advanced skills necessary for investment analysis and decision making, and agree to abide by the CFA Institute's Code of Ethics and Standards of Professional Conduct

Employment for the Past Five Years

Employment Dates: 11/2022 to Present
Firm Name: flexPATH Strategies
Type of Business: Broker Dealer and Investment Advisor
Job Title & Duties: Investment Adviser Representative

Employment Dates: 02/2011 to 11/2022
Firm Name: NFP Retirement, LLC
Type of Business: Investment Advisor
Job Title & Duties: Investment Adviser Representative

Items 3 & 7 - Disciplinary Information

As it relates to past, current or prospective clients, Brian Roberts has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or is not planning to file a bankruptcy petition.

Item 4 - Other Business Activities

None

Item 5 - Additional Compensation

None

Item 6 - Supervision

Brian Roberts is supervised by Monique Schulman, Chief Compliance Officer
Monique Schulman's contact information: 603-216-8894
monique.schulman@acaglobal.com