

Form ADV Part 2B – Brochure Supplement

for

**Amy L. Shroff, AIF®
Financial Strategist**

Effective: May 10th, 2023

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Amy L. Shroff (CRD# 4037735) in addition to the information contained in the Integrated Wealth Concepts, LLC (also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC) (“IWC” or the “Advisor”) (CRD # 284656) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWC Disclosure Brochure or this Brochure Supplement, please contact us at (781) 890-3045.

Additional information about Ms. Shroff is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her individual CRD# 4037735.

Integrated Wealth Concepts LLC
(also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC)

**Phone: (781) 890-3045
200 5th Ave., Suite 4010
Waltham, MA 02451**

**Phone: (720) 458-6843
333 West Hampden Ave., Suite 605
Englewood, CO 80110**

Item 2 – Educational Background and Business Experience

Amy L. Shroff, born in 1976, is dedicated to advising Clients of Integrated Wealth Concepts as a Financial Strategist. Ms. Shroff earned a Bachelor's Degree from Western Illinois University and Michigan State University in 1998. Additional information regarding Ms. Shroff's employment history is included below. Ms. Shroff is an Accredited Investment Fiduciary.

Employment History:

Integrated Wealth Concepts, LLC, Financial Strategist	05/2023 – Present
M.S. Howells & Co, Registered Representative	10/2017 – Present
PRISM Financial Strategies, LLC, Financial Strategist	09/2017 – 06/2023
Bancwest Investment Services, LLC, Wealth Financial Advisor	08/2011 – 09/2017

Accredited Investment Fiduciary® (AIF®)

Accredited Investment Fiduciary® (AIF®) designation is issued by the Center for Fiduciary Studies. AIF certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold AIF certification.

To attain the right to use the AIF designation, an individual must satisfactorily fulfill the following requirements:

- *Prerequisites* – A candidate must meet a point-based threshold based on a combination of education, relevant industry experience and professional development in order to be considered for the AIF designation.
- *Education* – Complete either a capstone program or a web-based education program; and
- *Examination* – Pass a proctored closed-book examination.

Individuals who become certified must complete 6 hours of continuing education requirements every year in order to maintain the right to continue to use the AIF designation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Shroff. Ms. Shroff has never been involved in any regulatory, civil or criminal action.

Securities laws require an advisor to disclose certain events, including regulatory citations, criminal events, and other matters that could be relevant to a client or prospective client's assessment of a financial advisor's integrity. These include matters that involve allegations that the financial advisor engaged in violations of securities and other statutes; fraud; false statements or omissions; theft, embezzlement/wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **Ms. Shroff is not subject to any events that are disclosable in this brochure supplement according to the standards discussed above.**

However, we do encourage you to independently view the background of Ms. Shroff on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4037735.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Shroff is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Ms. Shroff's role with IWC. As an insurance professional, Ms. Shroff may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Shroff is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Shroff or the Advisor.

Broker-Dealer Affiliation

Ms. Shroff is also a registered representative of M.S. Howell & Co. M.S. Howell & Co. is a registered broker-dealer (CRD# 104100), member FINRA, SIPC. In Ms. Shroff's separate capacity as a registered representative, Ms. Shroff will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Shroff. Neither the Advisor nor Ms. Shroff will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Shroff's separate capacity as a registered representative.

Rental Property

Ms. Shroff owns and manages rental property. Ms. Shroff does not offer rental properties to any clients. Ms. Shroff spends less than 10% of her time managing this property.

Item 5 – Additional Compensation

Ms. Shroff receives additional compensation based on the business activities in Item 4 above.

Item 6 – Supervision

Ms. Shroff serves as a Financial Strategist of IWC and is supervised by John Cataldo, the Chief Compliance Officer. Mr. Cataldo can be reached at (781) 890-3045.

IWC has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWC. Further, IWC is subject to regulatory oversight by various agencies. These agencies require registration by IWC and its Supervised Persons. As a registered entity, IWC is subject to examinations by regulators, which may be announced or unannounced. IWC is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Jeffrey G. Engelman, CFP[®], CIMA, CRPS[®]
Financial Strategist, Managing Partner**

Effective: May 10th, 2023

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey G. Engelman (CRD# 4338185) in addition to the information contained in the Integrated Wealth Concepts, LLC (also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC) (“IWC” or the “Advisor”) (CRD # 284656) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWC Disclosure Brochure or this Brochure Supplement, please contact us at (781) 890-3045.

Additional information about Mr. Engelman is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4338185.

**Integrated Wealth Concepts LLC
(also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC)**

**Phone: (781) 890-3045
200 5th Ave., Suite 4010
Waltham, MA 02451**

**Phone: (720) 458-6842
333 West Hampden Ave., Suite 605
Englewood, CO 80110**

Item 2 – Educational Background and Business Experience

Jeffrey G. Engelman, born in 1979, is dedicated to advising Clients of Integrated Wealth Concepts as a Financial Strategist. Mr. Engelman earned a Bachelor's Degree in Finance from the University of Nebraska in 2001. Additional information regarding Mr. Engelman's employment history is included below. Mr. Engelman is a CERTIFIED FINANCIAL PLANNER™ professional, a Certified Investment Management Analyst and a Chartered Retirement Plans Specialist.

Employment History:

Integrated Wealth Concepts, LLC, Financial Strategist	05/2023 – Present
PRISM Financial Strategies, LLC, Financial Strategist	08/2017 – 06/2023
Vision Investment Advisors, LLC, Investment Advisor	04/2013 – 08/2017

Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Investment Management Analyst (“CIMA”)

The Certified Investment Management Analyst (CIMA) designation is issued by the Investments & Wealth Institute.

CIMA certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CIMA certification.

To attain the right to use the CIMA designation, an individual must satisfactorily fulfill the following requirements:

- *Prerequisites* – Three years of financial services experience; and a satisfactory record of ethical conduct, as determined by Investments & Wealth Institute Admissions Committee
- *Education* – Education component offered by one of the approved Registered Education Providers, and in-class program at The Wharton School, University of Pennsylvania, or online through Yale School of Management
- *Examination* – Qualification Examination and Certification Examination (online, proctored)

Individuals who become certified must complete 40 hours of continuing education requirements every two years in order to maintain the right to continue to use the CIMA designation.

Chartered Retirement Plans Specialist (“CRPS®”)

Chartered Retirement Plans SpecialistSM (CRPS) designation is issued by College for Financial Planning. CRPS[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CRPS[®] certification.

To obtain the right to use the CRPS[®] designation, an individual must satisfactorily fulfill the following requirements:

- Education – Online instructor led or self-study course
- Examination – Final designation exam (online, timed)

Individuals who become certified must complete 16 hours of continuing education requirements every two years in order to maintain the right to continue to use the CRPS[®] designation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Engelman. Mr. Engelman has never been involved in any regulatory, civil or criminal action.

Securities laws require an advisor to disclose certain events, including regulatory citations, criminal events, and other matters that could be relevant to a client or prospective client’s assessment of a financial advisor’s integrity. These include matters that involve allegations that the financial advisor engaged in violations of securities and other statutes; fraud; false statements or omissions; theft, embezzlement/wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***Mr. Engelman is not subject to any events that are disclosable in this brochure supplement according to the standards discussed above.***

However, we do encourage you to independently view the background of Mr. Engelman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4338185.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Engelman is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Engelman’s role with IWC. As an insurance professional, Mr. Engelman may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Engelman is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Engelman or the Advisor.

Item 5 – Additional Compensation

Mr. Engelman receives additional compensation based on the business activities in Item 4 above.

Item 6 – Supervision

Mr. Engelman serves as a Financial Strategist of IWC and is supervised by John Cataldo, the Chief Compliance Officer. Mr. Cataldo can be reached at (781) 890-3045.

IWC has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWC. Further, IWC is subject to regulatory oversight by various agencies. These agencies require registration by IWC and its Supervised Persons. As a registered entity, IWC is subject to examinations by regulators, which may be announced or unannounced. IWC is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Robert S. Single
Financial Strategist**

Effective: May 10th, 2023

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Robert S. Single (CRD# 6705259) in addition to the information contained in the Integrated Wealth Concepts, LLC (also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC) (“IWC” or the “Advisor”) (CRD # 284656) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWC Disclosure Brochure or this Brochure Supplement, please contact us at (781) 890-3045.

Additional information about Mr. Single is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 6705259.

Integrated Wealth Concepts LLC
(also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC)

Phone: (781) 890-3045
200 5th Ave., Suite 4010
Waltham, MA 02451

Phone: (720) 458-6845
333 West Hampden Ave., Suite 605
Englewood, CO 80110

Item 2 – Educational Background and Business Experience

Robert S. Single, born in 1964, is dedicated to advising Clients of Integrated Wealth Concepts as a Financial Strategist. Mr. Single earned a Master's Degree in Geology from the University of Texas in 1993. Additional information regarding Mr. Single's employment history is included below.

Employment History:

Integrated Wealth Concepts, LLC, Financial Strategist	05/2023 – Present
PRISM Financial Strategies, LLC, Financial Strategist	12/2020 – 06/2023
Edward Jones, Financial Advisor	09/2016 – 10/2020
Unemployed	04/2016 – 08/2016
Anadarko Petroleum, Geologist	04/2003 – 03/2016

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Single. Mr. Single has never been involved in any regulatory, civil or criminal action.

Securities laws require an advisor to disclose certain events, including regulatory citations, criminal events, and other matters that could be relevant to a client or prospective client's assessment of a financial advisor's integrity. These include matters that involve allegations that the financial advisor engaged in violations of securities and other statutes; fraud; false statements or omissions; theft, embezzlement/wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***Mr. Single is not subject to any events that are disclosable in this brochure supplement according to the standards discussed above.***

However, we do encourage you to independently view the background of Mr. Single on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6705259.

Item 4 – Other Business Activities

Rental Property

Mr. Single owns and manages rental property. Mr. Single does not offer rental properties to any clients. Mr. Single spends less than 10% of her time managing this property.

Item 5 – Additional Compensation

Mr. Single receives additional compensation based on the business activities in Item 4 above.

Item 6 – Supervision

Mr. Single serves as a Financial Strategist of IWC and is supervised by John Cataldo, the Chief Compliance Officer. Mr. Cataldo can be reached at (781) 890-3045.

IWC has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWC. Further, IWC is subject to regulatory oversight by various agencies. These agencies require registration by IWC and its Supervised Persons. As a registered entity, IWC is subject to examinations by regulators, which may be announced or unannounced. IWC is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Ryan R. Wells
Private Wealth Strategist**

Effective: May 10th, 2023

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan R. Wells (CRD# 3238125) in addition to the information contained in the Integrated Wealth Concepts, LLC (also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC) (“IWC” or the “Advisor”) (CRD # 284656) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWC Disclosure Brochure or this Brochure Supplement, please contact us at (781) 890-3045.

Additional information about Mr. Wells is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 3238125.

Integrated Wealth Concepts LLC
(also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC)

Phone: (781) 890-3045
200 5th Ave., Suite 4010
Waltham, MA 02451

Phone: (415) 713-2962
333 West Hampden Ave., Suite 605
Englewood, CO 80110

Item 2 – Educational Background and Business Experience

Ryan R. Wells, born in 1975, is dedicated to advising Clients of Integrated Wealth Concepts as a Private Wealth Strategist. Mr. Wells earned a Bachelor's Degree in Business Administration from the University of San Diego in 1998. Additional information regarding Mr. Wells's employment history is included below.

Employment History:

Integrated Wealth Concepts, LLC, Private Wealth Strategist	05/2023 – Present
PRISM Financial Strategies, LLC, Private Wealth Strategist	03/2020 – 06/2023
Strategies Capital Management, Vice President	01/2018 – 07/2020
Advisory Consulting Group, LLC, Investment Advisor Representative	01/2018 – 02/2018
RBC Capital Markets, LLC, Financial Advisor	10/2014 – 12/2017
Sanctuary Securities, LLC, Registered Representative	05/2014 – 10/2014
Merrill Lynch, Pierce, Fenner & Smith, Registered Representative	07/2002 – 03/2014

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Wells. Mr. Wells has never been involved in any regulatory, civil or criminal action.

Securities laws require an advisor to disclose certain events, including regulatory citations, criminal events, and other matters that could be relevant to a client or prospective client's assessment of a financial advisor's integrity. These include matters that involve allegations that the financial advisor engaged in violations of securities and other statutes; fraud; false statements or omissions; theft, embezzlement/wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***Mr. Wells is not subject to any events that are disclosable in this brochure supplement according to the standards discussed above.***

However, we do encourage you to independently view the background of Mr. Wells on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 3238125.

Item 4 – Other Business Activities

Mr. Wells does not have any additional outside business activities.

Item 5 – Additional Compensation

Mr. Wells receives additional compensation based on the business activities in Item 4 above.

Item 6 – Supervision

Mr. Wells serves as a Private Wealth Strategist of IWC and is supervised by John Cataldo, the Chief Compliance Officer. Mr. Cataldo can be reached at (781) 890-3045.

IWC has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWC. Further, IWC is subject to regulatory oversight by various agencies. These agencies require registration by IWC and its Supervised Persons. As a registered entity, IWC is subject to examinations by regulators, which may be announced or unannounced. IWC is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Shelly L. Schell, CDFA®
Investment Advisor Representative**

Effective: May 10th, 2023

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Shelly L. Schell (CRD# 3031239) in addition to the information contained in the Integrated Wealth Concepts, LLC (also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC) (“IWC” or the “Advisor”) (CRD # 284656) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWC Disclosure Brochure or this Brochure Supplement, please contact us at (781) 890-3045.

Additional information about Ms. Schell is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her individual CRD# 3031239.

**Integrated Wealth Concepts LLC
(also d/b/a Integrated Partners, Integrated Financial Partners, PRISM Financial Strategies, LLC)**

**Phone: (781) 890-3045
200 5th Ave., Suite 4010
Waltham, MA 02451**

**Phone: (720) 458-6844
333 West Hampden Ave., Suite 605
Englewood, CO 80110**

Item 2 – Educational Background and Business Experience

Shelly L. Schell, born in 1972, is dedicated to advising Clients of Integrated Wealth Concepts as an Investment Advisor Representative. Ms. Schell earned a Bachelor's Degree from Ohio State University in 1995. Additional information regarding Ms. Schell's employment history is included below. Ms. Schell is a Certified Divorce Financial Analyst.

Employment History:

Integrated Wealth Concepts, LLC, Investment Advisor Representative	05/2023 – Present
PRISM Financial Strategies, LLC, Investment Advisor Representative	09/2017 – 06/2023
Bancwest Investment Services, LLC, Wealth Financial Advisor	07/2011 – 09/2017

Certified Divorce Financial Analyst (CDFA®)

The Certified Divorce Financial Analyst (CDFA®) designation is issued by the Institute for Divorce Financial Analysts. CDFA certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CDFA certification.

To attain the right to use the CDFA designation, an individual must satisfactorily fulfill the following requirements:

- *Prerequisites* – Bachelor's degree with three years of on-the job experience or, if no bachelor's degree, five years of relevant experience.
- *Examination* – Proctored Final Examination

Individuals who become certified must complete 30 divorce-related hours of continuing education requirements every two years in order to maintain the right to continue to use the CFDA designation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Schell. Ms. Schell has never been involved in any regulatory, civil or criminal action.

Securities laws require an advisor to disclose certain events, including regulatory citations, criminal events, and other matters that could be relevant to a client or prospective client's assessment of a financial advisor's integrity. These include matters that involve allegations that the financial advisor engaged in violations of securities and other statutes; fraud; false statements or omissions; theft, embezzlement/wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***Ms. Schell is not subject to any events that are disclosable in this brochure supplement according to the standards discussed above.***

However, we do encourage you to independently view the background of Ms. Schell on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 3031239.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Schell is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Ms. Schell's role with IWC. As an insurance professional, Ms. Schell may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Schell is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Schell or the Advisor.

Rental Property

Ms. Schell owns and manages rental property. Ms. Schell does not offer rental properties to any clients. Ms. Schell spends less than 10% of her time managing this property.

Item 5 – Additional Compensation

Ms. Schell receives additional compensation based on the business activities in Item 4 above.

Item 6 – Supervision

Ms. Schell serves as an Investment Advisor Representative of IWC and is supervised by John Cataldo, the Chief Compliance Officer. Mr. Cataldo can be reached at (781) 890-3045.

IWC has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWC. Further, IWC is subject to regulatory oversight by various agencies. These agencies require registration by IWC and its Supervised Persons. As a registered entity, IWC is subject to examinations by regulators, which may be announced or unannounced. IWC is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.