

ITEM 2: MATERIAL CHANGES FROM PREVIOUS VERSION

This brochure replaces the brochure dated October 1, 2023. The following material changes have been made:

- In Item 12: Brokerage Practices, we removed reference to ACA Group and replaced it with a qualified national consulting firm to test best execution.
- In Item 12: Brokerage Practices, we added a description of our Trading Aggregation and Allocation Procedures.