Cloudsplitter Financial Planning, LLC 7301 Mar Del Drive Cincinnati, Ohio 45243 (513) 298-9399

https://cloudsplitterfp.com

Form ADV Part 2A – Firm Brochure Dated: October 27, 2025

This Brochure provides information about the qualifications and business practices of Cloudsplitter Financial Planning, LLC. If you have any questions about the contents of this Brochure, please contact us at (513) 298-9399. 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.

Cloudsplitter Financial Planning, LLC is registered as an Investment Adviser with the State of Ohio. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Cloudsplitter Financial Planning, LLC is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 339252.

## Item 2: Material Changes

### **Material Changes:**

There are no material changes at this time as this is the initial version of this Brochure.

#### **Future Changes:**

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Cloudsplitter Financial Planning, LLC.

At any time, you may view the current Brochure online at the SEC's Investment Adviser Public Disclosure website at http://www.adviserinfo.sec.gov by searching for our firm name or by our CRD number 339252. You may also request a copy of this Brochure at any time by contacting us at (513) 298-9399 or by emailing mike@cloudsplitterfp.com.

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## Item 4: Advisory Business

Cloudsplitter Financial Planning, LLC (hereinafter referred to as "CS", "we," "firm," and "us") is an Ohio limited liability company founded in 2025 with its principal place of business in Madeira, Ohio, a suburb near Cincinnati. It is owned by Michael Schelle, who serves as founder, financial advisor and chief compliance officer.

Cloudsplitter Financial Planning was created to help working individuals, families and retirees codify their personal values and financial goals into a comprehensive financial plan that will bring peace of mind and help bring a greater sense of personal fulfillment.

Cloudsplitter Financial Planning is a fee-only financial planning and investment advisory firm. We do not sell commissioned products, we do not receive commissions, referral or finder's fees or kickbacks of any form. In an effort to reduce conflicts of interest as much as possible, our only compensation comes from the advisory fees our clients pay us.

#### Types of Advisory Services Offered:

CS offers a range of services to meet the needs of our clients. Following is a description of our core offerings:

#### **Financial Planning:**

Our advisory relationship and data-gathering begins with a conversation on your values and history with money that will inform your short- and long-term goals. We will combine these priorities with your risk tolerance and income resources to develop an actionable path to success, keeping an eye out for efficiency opportunities and changing factors both external and internal to your plan.

We will review your financial plan at least annually to ensure you are on track to meet your goals. We will be clear on steps that belong to us as well as items that must be completed by you. While we will seek at least an annual review with you, you may expect points of contact throughout the year to check-in and offer planning opportunities. We are also always available for your questions and plan adjustments via phone call or email.

#### **Portfolio Management:**

We will craft a portfolio for your assets that gives you the best chance of reaching your goals while staying within the boundaries of your risk tolerance. Our strategy is built on a thesis of asset class diversification, tax efficiency and low-cost investing that always places your best interests above all else. We monitor accounts regularly, but overall we believe long-term investing will lead to better results than short-term market timing.

#### **Retirement Planning:**

Our retirement planning will not only give you clear goals to work towards during your earning years, but it will demystify the huge life change when you switch to drawing down a lifetime of

savings. We will model and show the opportunity in different drawdown strategies to reduce lifetime taxes and increase your expected estate value. We will help you manage the timing and strategy on taking different income streams such as Social Security, pensions and annuities, and we will manage required distributions from retirement accounts.

#### **Education Planning:**

Providing for our children's education is a primary goal for many families. Whether it is private primary and secondary education, college, or tradecraft, we are here to show you the different accounts and tools that will allow you to plan and save accordingly so your kids enter adulthood ready to achieve their own goals.

#### **Estate Planning & Charitable Giving:**

Since every person will unfortunately die, every person should inevitably give thought to their estate and wealth after passing. We will audit and ensure your accounts are properly titled and you understand the ramifications of any beneficiary decisions. When prudent, we will show you how trusts and other more complex legal strategies may serve your generational wishes. We are always happy to work in tandem with attorneys and other professionals on your financial team, at all times maintaining our loyalty and fiduciary duty to serve your best interests.

Giving back is a powerful calling for many, and we will educate you on the strategies of charitable giving that can maximize each dollar's potential for good. When ready, we are here to guide family discussions of wealth so that the next generation is primed to responsibly serve as stewards.

Comprehensive Insurance Review: We will review your existing policies to ensure proper coverage for life, disability, long-term care, and umbrella. No member of CS is licensed to sell insurance products, and we do not sell any insurance products. CS will participate in meetings or phone calls between you and your insurance agent(s) with your approval or request in order to act as a second set of ears and advocate on your behalf as a fiduciary.

#### **Tax Planning:**

Tax planning is perhaps the most underutilized form of financial planning relative to its impact. We view tax planning as a primary tool to your success and will carefully review your short- and long-term income projections to manage your tax brackets before and after retirement. This includes Roth conversions, balancing pre-tax and Roth retirement account contributions, thoughtful management of stock options, awards and other deferred compensation and Social Security timing.

Each of our recommended tactics will be fully explained and approved by you through our discussions, and we will always work hand in hand with your accountant or CPA to ensure timely payments and filings.

#### **Wrap Fee Programs:**

We do not participate in wrap fee programs.

#### **Assets under Management:**

CS currently reports \$0 discretionary and \$0 non-discretionary assets under management ("AUM") as of October 27, 2025.

## Item 5: Fees and Compensation

Client shall pay CS an annual asset-based fee ("Fee") at the rate negotiated and listed on the Client Services Agreement. Asset-based fees are the firm's only form of compensation, which helps mitigate potential conflicts of interest.

Fees are billed in arrears on a quarterly basis and will be based on the average daily value of the account billable assets during the preceding quarter as valued by the custodian. Fees will be processed by the 20th of the month following the end of a quarter (e.g. Q4 fees will be billed by January 20). An invoice will be sent to the client and custodian at the same time.

The fee schedule below shows our base rates, but it is negotiable under the discretion of the advisor. Factors that may warrant negotiation include the size of the account and the client's relationship to the advisor. We may lower our fees at our discretion, but we will only raise fees with written Client consent.

Assets Under Management	Annualized Fee
Up to \$500,000 \$500,001 - \$1 million \$1 million up to \$3 million \$3 million up to \$5 million \$5 million and up	1.00% 0.90% 0.80% 0.70% 0.60%

#### **Termination of Services:**

Either client or CS are permitted to terminate their agreement for services at any time with written notice to the other. At termination, any fees owed for the duration of the current quarter through the date of the cancellation will be billed to the accounts. Accounts may then be transferred to other management or re-coded as retail accounts at the custodian as the client wishes.

#### **How Billing Works:**

Fees are deducted directly from client accounts by the custodian and paid to CS unless the client specifies in writing they wish to pay the fee in the form of a check. Account fees will be paid from the account itself when required by tax law, however, when beneficial and discussed

with the client we may pay fees for one account from another account (e.g. taxable account pays fees for Roth IRA). Clients must consent for our custodian to deduct the fees from their account when they sign the Client Services Agreement, and the fees will be clearly noted on the client's custodian statements.

#### Other Fees and Expenses:

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

## Item 6: Performance-based Fees and Side-By-Side Management

We do not offer performance-based fees (fees based on the capital gains of a client's funds) and do not engage in side-by-side management.

## Item 7: Types of Clients

We serve individuals and high net worth individuals. We do not have a minimum account balance requirement.

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

#### **Our Investment Philosophy:**

It is our belief that investors should base their portfolio allocation on their own personal risk tolerance, time horizon and financial goals. Within that structure, we favor diversification across various markets and industry sectors over concentration within an individual or small number of company stocks. Many clients hold individual stock that carries significant unrealized capital gains, and we will work with the client to develop a strategy to either mitigate concentration risk or reduce the position with as little tax impact as possible.

We choose passive ETFs and mutual funds to capture target sector allocations based on a number of factors such as internal expenses, trading volume and cash held by the fund. Individual bonds and treasuries may be used for the fixed income allocation of a portfolio or to address a specific cash need. We select these bonds based on rating and time to maturity as well as interest rate. Municipal bonds may be used for high-income individuals with the

understanding that the tax advantages can increase the tax-equivalent yield for clients' in a higher tax bracket.

Account tax treatment is also considered in portfolio construction, and equity ETFs will be used more in taxable accounts while mutual funds and fixed income assets will be allocated more heavily to tax-deferred accounts.

#### Risk of Loss:

Investing involves a risk of loss. It is neither the promise nor the process of CS to try to time the market to avoid downturns, as decades of research has shown attempting this will rarely outperform a long-term strategy. Clients should be prepared to bear investment loss, including the loss of the original principal. Clients should never presume that future performance of any specific investment or investment strategy will be profitable. Further, there are varying degrees of risk depending on different types of investments. Clients should know that all investments carry a certain degree of risk ranging from the variability of market values to the possibility of permanent loss of capital. Although portfolios seek principal protection, asset allocation and investment decisions are not guaranteed to achieve this goal in all cases. There is no guarantee a portfolio will meet a target return or an investment objective.

As we work with clients to develop long-term investment plans, we educate them about the various risks that are involved in investing. All investment securities, including mutual funds, contain a risk of loss of income and principal. Investing carries risks that may include, but are not necessarily limited to market risk, interest rate risk, issuer risk, and general economic risk.

## Item 9: Disciplinary Information

#### **Criminal or Civil Actions:**

CS and its management persons have not been involved in any criminal or civil action.

#### **Administrative Enforcement Proceedings:**

CS and its management persons have not been involved in administrative enforcement proceedings.

#### **Self-Regulatory Organization Enforcement Proceedings:**

CS and its management persons have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of CS or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

CS and its management persons have no other industry activities nor affiliations.

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

#### Code of Ethics:

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity All CS employees shall offer and provide professional services with integrity.
- Objectivity We shall be objective in providing professional services to Clients.
- Competence We shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness We shall perform professional services in a manner that is fair and reasonable to Clients and shall disclose conflict(s) of interest in providing such services.
- Confidentiality We shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.

• Professionalism - Our conduct in all matters shall reflect the credit of the profession.

• Diligence - We shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and CS will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

#### **Participation or Interest in Client Transactions:**

CS and its employees do not recommend investments in which any employee or related individual has a material financial interest.

#### **Personal Trading:**

From time to time our firm, its employees, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, our Code of Ethics requires that we purchase or sell securities for our clients' accounts, if suitable and appropriate, before purchasing or selling any of the same securities for any accounts owned by us or our employees. The only exception to this policy is where our firm or its employees' transactions are bundled in an aggregate ("block") trade

simultaneously with client accounts. This policy is not applicable to securities where no conflict of interest exists, such as shares of mutual funds that are equally priced daily.

# Item 12: Brokerage Practices

#### **Broker-Dealer Relationships and Benefits:**

CS does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize CS to direct trades to the Custodian as agreed upon in the Client Services Agreement. Further, CS does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

With this consideration, our firm recommends Fidelity Brokerage Services, LLC ("Fidelity"), and Charles Schwab & Co., Inc. ("Schwab") to our clients, both of which are independent and unaffiliated firms. Such recommendations will take into account a number of factors, some of which include custodial fees charged by the broker for holding securities for the client, commission rates, quality of execution and record keeping and reporting capabilities. When recommending a broker, we will attempt to minimize the total cost for all brokerage services paid by you. However, it might be the case that the recommended broker charges a higher fee for a particular type of service, such as commission rates, than can be obtained from another broker. You can utilize the broker/dealer of your choice and have no obligation to purchase or sell securities through such a broker as we recommend.

#### Additional Fidelity and Schwab Disclosure:

We have an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") and Charles Schwab & Co., Inc. (Schwab), through which Fidelity and Schwab provide us with "platform" services. The platform services include, among others, brokerage, custodial, administrative support, trading execution and settlement, record keeping and other related services that are intended to support intermediaries like us in conducting business and in serving the best interests of our clients but may benefit us.

Both Fidelity and Schwab charge brokerage commission and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, individual equity and debt security transactions). Fidelity and Schwab enable us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Their commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, they also make available to us, at no additional charge to us, certain research and brokerage services, including research services obtained by Fidelity and Schwab directly from independent research companies, as selected by us (within specified parameters).

These research and brokerage services are used by us to manage accounts for which we have discretion.

As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity and Schwab's services. We examined this potential conflict of interest when we chose to enter the relationships and we have determined that the relationships are in the best interest of some of our clients and satisfies our obligations, including our duty to seek best execution. You may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates and responsiveness.

We are not affiliated with Fidelity or Schwab and have no broker-dealer affiliations. CS does not receive client referrals from either Fidelity or Schwab.

#### Order Aggregation/Block Trading/Allocations:

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

#### **Trade Errors:**

While trading errors are rare and our trading process seeks to prevent them, they cannot always be avoided. When a trade error happens in an account due to our error, we will correct the error and ensure the client account does not suffer a loss or incur a transaction cost related to the error.

#### **Soft Dollar Benefits:**

CS does not receive any financial compensation from brokerage referrals, nor does it receive any targeted or customized research. CS does not have any formal soft dollar arrangements. CS will receive general research reports from Fidelity/Schwab that all such investment advisors receive when utilizing the same custodial services.

#### Item 13: Review of Accounts

Accounts are monitored continuously and on an ongoing basis by Michael Schelle, financial advisor and chief compliance officer of CS. We conduct these reviews through various means, including telephone calls, in-person meetings, overall strategy reviews, and/or the review of monthly and quarterly statements. Reviews are based on objectives and parameters established by clients, which are generally recorded through their Client Services Agreements and Investment Policy Statements. More frequent reviews can also be triggered by a change in the client's investment objectives or risk tolerance, tax considerations, large deposits or withdrawals, large purchases or sales, loss of confidence in investment or fund managers, or changes in the economy or financial markets.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest. CS will not provide additional statements or reports than those already provided by the Client's custodian.

## Item 14: Client Referrals and Other Compensation

It is our policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from any third-party in conjunction with the advisory services we provide our clients. If we make recommendations of other financial professionals or service providers we receive no compensation in relation to those referrals. Clients are under no obligation to utilize any service or professional we may recommend.

## Item 15: Custody

CS does not accept custody of Client funds except in the instance of withdrawing CS's management fees. For Client accounts in which CS directly debits their management fee:

- a. CS will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- b. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the management fee.
- c. The Client will provide written authorization to CS permitting them to be paid directly for their accounts held by the custodian. Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or

reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### Item 16: Investment Discretion

When a client hires us to provide discretionary investment advisory services, we have the authority to place trades, buy and sell securities on the client's behalf, determine the amount of the securities to buy and sell, and determine the nature and type of securities to buy and sell without obtaining a client's consent or approval prior to each transaction. In some cases, we will have the authority to hire and fire third-party money managers. Clients who give us discretionary authority will give our firm a limited power of attorney and/or trading authorization forms to make the above decisions on the client's behalf.

Client may elect to hold certain securities or assets in a non-discretionary account with us. In these instances we will require authorization from the Client for each transaction.

## Item 17: Voting Client Securities

Despite our trading discretion over a client's account(s), we will not vote proxies on behalf of any client or respond to any legal notices or class action claims on behalf of a client.

We will instruct the qualified, independent custodian to forward all proxy materials, legal notices, and class action information to the client to review and make his or her own informed decision on how to vote. In the event we receive the proxy material, we will forward them directly to the client by mail or by electronic mail (if the client has authorized electronic communication).

#### Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months in advance.

## Item 19: Requirements for State-Registered Advisers

Michael Schelle serves as CS's sole principal. Information about Michael Schelle's education, business background, outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

#### Performance-Based Fees:

Neither CS nor Michael Schelle are compensated by performance-based fees.

# **Material Disciplinary Disclosures:**

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

# **Material Relationships That Management Persons Have With Issuers of Securities:**

CS nor Michael Schelle have any relationship or arrangement with issuers of securities.

Cloudsplitter Financial Planning, LLC 7301 Mar Del Drive Cincinnati, Ohio 45243 (513) 298-9399 https://cloudsplitterfp.com

Form ADV Part 2B - Brochure Supplement

Dated: October 27, 2025

For

Michael Schelle

Founder, Financial Advisor, and Chief Compliance Officer

This brochure supplement provides information about Michael Schelle that supplements the Cloudsplitter Financial Planning, LLC ("CS") brochure. A copy of that brochure precedes this supplement. Please contact Michael Schelle if the CS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Michael Schelle is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6915215.

## Item 2: Educational Background and Business Experience

Michael Schelle, CFP®

Born: 1983

#### **Educational Background**

• 2005 - Wittenberg University - Bachelor's in English

## **Business Experience**

• 10/2025 – Present

Cloudsplitter Financial Planning, LLC, Founder, Financial Advisor, and CCO

• 05/2023 - 06/2025

The Mather Group, Wealth Advisor

• 01/2016 - 05/2023

Clear Perspectives Financial Planning, Financial Advisor

#### Professional Designation(s):

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) 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 70,000 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 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.

## Item 3: Disciplinary Information

Michael Schelle has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

#### Item 4: Other Business Activities

Michael Schelle has no other business activities.

## Item 5: Additional Compensation

Michael Schelle does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CS.

## Item 6: Supervision

Michael Schelle as Chief Compliance Officer of CS, is the sole investment adviser representative. Should there be additional representatives in the future, Michael Schelle would be responsible for their supervision. Michael Schelle is bound by CS's Code of Ethics. Clients may contact Michael Schelle at the phone number on this brochure supplement.

# Item 7: Requirements for State Registered Advisers

Michael Schelle has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition