Form CRS Client Relationship Summary
Broadstreet Global Advisors, Inc.
January 27, 2023

Item 1 – Introduction: Is an investment advisory account right for you?

Broadstreet Global Advisors, Inc. is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at **Investor.gov/CRS**, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – What investment services and advice can you provide me?

We offer investment advisory services to retail investors. Our principal services include wealth management and financial consulting services. As part of our wealth management service, we provide continuous and regular supervisory and management services with respect to your account(s). Our management services are offered on a discretionary basis. Discretionary authorization allows us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. We do not limit our advice to proprietary products, or a limited menu of products or types of investments. As part of our overall wealth management services, we offer financial planning services typically focused on the specific needs and concerns of the client. We encourage clients to work with the firm to obtain these planning services because the firm believes this planning component is beneficial in achieving the Client's long-term financial goals. We require a minimum of $100,000 to establish a relationship with us. However, from time-to-time, in our sole discretion, we may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other factors. We monitor wealth management accounts on a continuous basis and recommend a formal review with the client at least annually.

Although we do not provide broad based financial planning services outside of our wealth management service, we provide financial consulting services that focus on the specific needs and concerns of the client and cover topics such as retirement planning, tax planning and investment planning. These services include the identification of financial goals and objectives, collection and assessment of all relevant data, identification of financial problems and formulation of solutions, and, if requested by the Client, the preparation of a plan in the form of specific written recommendations. Financial consulting services do not include ongoing management of client assets.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A at the following link:
https://adviserinfo.sec.gov/firm/brochure/324586

Conversation Starters. Ask your financial professional—

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3 – What fees will I pay?

We are primarily compensated by a percentage of assets under our management and hourly charges. Our fees vary depending on the services you receive. Portfolio management fees are based upon a percentage of your assets under our management, and are typically payable monthly in advance, depending on the payment arrangement negotiated with the client and set forth in the client agreement. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. We provide financial consulting services for an hourly fee. Our fees are negotiable depending upon the complexity and scope of the service, your financial situation, and your objectives.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A at the following link:
https://adviserinfo.sec.gov/firm/brochure/324586

Description of Other Fees and Costs: The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies (i.e., mutual funds, exchange traded funds, unit investment trusts and variable annuities). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the custodial broker dealer that executes the trade. The custodial broker dealer may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees or other special service fees and charges. We do not share in any portion of these fees imposed by the custodial broker dealer. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**

For additional information about fees charged by third parties, please refer to Item 5 of Form ADV Part 2A at the following link: https://adviserinfo.sec.gov/firm/brochure/324586

Conversation Starter. Ask your financial professional—

- *Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. Here are some examples to help you understand what this means:

All investment advisers face conflicts of interest which are inherent in the business. Our primary source of compensation is through asset-based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts of interest result from other business activities we engage in and relationships we have with business partners, such as our custodial broker dealer(s) (i.e., Schwab, Equity Trust Company and Kingdom Trust), and other vendors.

Conversation Starter. Ask your financial professional—

- *How might your conflicts of interest affect me, and how will you address them?*

Please refer to our Form ADV Part 2A for further information on our conflicts of interest and how we address them at the following link: https://adviserinfo.sec.gov/firm/brochure/324586

How do your financial professionals make money?

Our financial professionals receive salary-based compensation, a percentage of advisory billings and/or bonuses based on the amount of client assets they bring to our firm. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Additionally, financial professionals who have an ownership interest in our firm share in the profits generated by our firm.

Item 4 – Do you or your financial professionals have legal or disciplinary history?

No, neither our firm nor our financial professionals have legal or disciplinary history to disclose.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

Conversation Starter. Ask your financial professional—

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5 – Additional Information

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at **https://adviserinfo.sec.gov/firm/brochure/324586** and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please call us at (914) 582-6536.

Conversation Starters. Ask your financial professional—

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*

Form ADV Part 2A Brochure

Cover Page - Item 1

Broadstreet Global Advisors, Inc.

361 Route 202
Somers, NY 10589

Phone: (914) 582-6536
Fax: (914) 500-2375
www.broadstreetglobaladvisors.com

November 3, 2023

This brochure provides information about the qualifications and business practices of Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet"). If you have any questions about the contents of this brochure, please contact us at (914) 582-6536. 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 Broadstreet Global Advisors, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Broadstreet Global Advisors, Inc. is an SEC registered investment adviser. Registration does not imply any level of skill or training.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

On November 3, 2023, our primary office address changed and we moved to 361 Route 202, Somers, NY 10589.

Since our last filing we have amended this brochure to disclose that we provide continuous management services for approximately $39,943,615 in client assets managed on a discretionary basis.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at (914) 582-6536.

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Advisory Business - Item 4

Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet" or the "firm") is a registered investment adviser based in Somers, New York. We are a limited liability company, organized under the laws of the State of New York. We have been providing investment advisory services since 2023. Nick Mancini is the principal owner of Broadstreet.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, an employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives.

Currently, we offer the following investment advisory services, personalized for each individual Client:

- Wealth Management Services
- Financial Consulting Services

Wealth Management Services
Broadstreet offers wealth management services to Clients where we manage our client's investments within the larger context of the client's overall wealth management and planning process. Wealth management services consist of ongoing advice and discretionary portfolio management services. At the start of the service, an Associated Person will have one or more consultations with the Client to determine the Client's investment objectives, risk tolerance, and other relevant information (the "suitability information"). We will also use the information we gather from our consultation(s) to create an investment strategy.

As part of our overall wealth management services, we offer financial planning services typically focused on the specific needs and concerns of the client. These services cover topics such as estate and gift planning, education planning, retirement planning, risk management (insurance issues), and non-investment related matters. A financial plan may include, but is not limited to a net worth statement, cash flow statement, review of investment accounts including reviewing past asset allocations, providing asset repositioning recommendations, strategic tax planning, education planning with funding recommendations, review of retirement accounts and plans including recommendations and one or more retirement scenarios, review of insurance policies and recommendations for changes, if necessary and an estate planning review with related recommendations. Broadstreet encourages clients to work with the firm to obtain these planning services because the firm believes this planning component is beneficial in achieving the Client's long-term financial goals.

Broadstreet implements investment recommendations as part of its ongoing portfolio management service by developing a strategy that enables us to give the Client continuous and focused investment advice. As part of our portfolio management services, we customize an investment portfolio in line with the Client's risk tolerance and investing objectives. Once we construct an investment portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and/or the Client's financial circumstances.

Our portfolio management services are primarily offered on a discretionary basis. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you for prior approval of each transaction. These decisions are made based upon your stated investment objectives. You may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. In limited circumstances and in our sole discretion, we may offer portfolio management services on a non-discretionary basis. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Broadstreet does not recommend one particular type of security over other types of securities. We provide advice on various types of securities, including advice on existing investments you may hold at the inception of the advisory relationship or on other types of investments for which you ask advice.

Broadstreet will monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions, your financial circumstances, or both.

Management of Held Away Assets

As part of our wealth management services, we provide asset allocation review, rebalancing and management services for accounts that are not held in custody of the qualified custodian(s) recommended by our firm. These services are provided through an account aggregation service called Pontera. The service primarily applies to ERISA and non-ERISA plan assets such as 401(k)s and 403(b)s, and other assets that must be held in custody of the plan custodian(s). We regularly review the available investment options in these accounts, monitor them, and periodically rebalance and implement our strategies using different tools, as necessary. If you elect to allow our firm to manage your assets through Pontera, you will be notified via email when we place trades through Pontera. Under no circumstances will we possess privileges that would impute custody to our firm under applicable rules and regulations, including, but not limited to: maintaining your account log-in credentials on file; having the ability to change your address on record or ability to authorize distributions from your accounts; or authorization to open any new accounts on your behalf through the web-based platform.

Financial Consulting Services

Although Broadstreet does not provide broad based financial planning services outside of our wealth management service, we provide consulting services that focus on the specific needs and concerns of the client. Financial consulting services may include giving advice on investment and investment related matters. These services include the identification of financial goals and objectives, collection and assessment of all relevant data, identification of financial problems and formulation of solutions, and, if requested by the Client, the preparation of a plan in the form of specific written recommendations. The services we provide will typically focus on one or more of the following areas:

Retirement Planning

Retirement Planning is a process of determining retirement income goals and the actions and decisions necessary to achieve those goals. Retirement planning includes identifying sources of income, estimating expenses, implementing a savings program and managing assets. Future cash flows are estimated to determine if the retirement income goal will be achieved.

Tax Planning

The goal of tax planning is to arrange your financial affairs so as to minimize your taxes. There are three basic ways to reduce your taxes, and each basic method might have several variations. You can reduce your income, increase your deductions, and take advantage of tax credits.

Investment Planning

The goal of investment planning is to determine the investment mix and policy, matching investments to objectives, asset allocation for individuals and institutions, and balancing risk against performance. The process realizes strengths, weaknesses, opportunities and risks in the choice of debt vs. equity, domestic vs. international, growth vs. safety, and many other tradeoffs encountered in the attempt to maximize return at a given risk.

Financial plans are based on your financial situation and the financial information you provide to our firm. If your financial situation, goals, objectives, or needs change, you must notify us promptly.

You may choose to accept or reject our recommendations. If you decide to proceed with our recommendations, you may do so either through our firm or by using the advisory/brokerage firm of your choice.

Important Note: Information related to tax and legal consequences that is provided as part of the financial plan is for informative purposes only. Clients are instructed to contact their tax or legal advisers for personalized advice

Assets Under Management
As of June 26, 2023, we provide continuous management services for approximately $39,943,615 in client assets managed on a discretionary basis.

Fees and Compensation - Item 5

Wealth Management Services Fees
Wealth management fees are billed monthly, in advance, and are based on the value of your portfolio at the end of the preceding month. Terms of payment are stated in the portfolio management agreement signed by the Client and the firm. Generally, the portfolio management fee will be deducted from the Client's account held with a non-affiliated, qualified custodian. The qualified custodian will provide the Client with an account statement. This statement will detail all account activity, including any fees deducted from the account(s). We may deduct the fee from a single, client-designated account to facilitate billing. Broadstreet will also receive a copy of your account statements from the custodian. Please review each statement for accuracy. Please let us know immediately if you have questions about or if you did not receive a statement. In our sole discretion, we may also negotiate other fee payment arrangements with clients. These payment arrangements will be clearly set forth in the wealth management agreement signed by the Client and the firm.

On an annualized basis, Broadstreet typically charges an annual fee, based upon a percentage of the market value of the assets being managed, ranging up to 2.00% of assets under management. We may also negotiate other fee schedules, such as an annual fixed fee or an annual percentage of assets under management fee based on a tiered fee schedule. For illiquid alternative investments held at Kingdom Trust, the management fee is set at a flat rate of 1.00% of assets under management.

Portfolio management fees are negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of the Client's financial circumstances, among others. The exact fee to be paid by the Client will be clearly stated in the wealth management agreement signed by the Client and the firm.

At the inception of wealth management services, the first pay period's fees will be calculated on a pro-rata basis. The wealth management agreement between the Client and Broadstreet will continue in effect until either party terminates the wealth management agreement in accordance with the terms of the wealth management agreement. Broadstreet's annual fee will be pro-rated through the date of termination and any pre-paid, unearned fees will be promptly refunded to the Client.

Our annual fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses. You are responsible for brokerage costs incurred. However, Broadstreet will not receive any portion of the commissions, fees, and costs. Please see Item 12 – Brokerage Practices for further information on brokerage and transaction costs. We urge clients to review this section in detail to familiarize themselves with the custodial fee billing arrangements negotiated with Charles Schwab & Co., Inc., Equity Trust Company, and Kingdom Trust.

Financial Consulting Services Fees
Broadstreet charges a negotiable hourly fee of $300 for stand-alone financial consulting services. Prior to engaging Broadstreet to provide financial consulting services, clients will be required to enter into a written financial consulting agreement which will set forth the terms and conditions of the engagement and will describe the scope of the services to be provided.

Fees are typically payable in arrears, but we may negotiate other fee payment arrangements with clients on a case-by-case basis.

Either party may terminate the financial consulting agreement by written notice to the other. Refunds are typically not applicable since fees are payable in arrears. In the event we negotiate a fee collected in advance, any unearned fees will be refunded to the client upon termination.

Individual Retirement Account Rollover Disclosures
As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account (“IRA”) may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase to the investor as a result because the above-described fees will apply to assets rolled over to an IRA and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Additional Fees and Expenses
Fees are negotiable based on the amount of assets under management, complexity of Client goals and objectives, and level of services rendered. As described above, the fees are charged as described and are not based on a share of capital gains of the funds of any advisory Client.

All fees paid to Broadstreet for investment advisory services are separate and distinct from the fees and expenses charged to shareholders by mutual funds or exchange traded funds. These fees and expenses are described in each fund's prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

A Client could invest in a mutual fund directly, without the services of Broadstreet. In which case, the Client would not receive the services provided by Broadstreet, which are designed, among other things, to assist the Client in determining which mutual fund or funds are most appropriate to their financial condition and objectives. Accordingly, Clients should review the fees charged by the funds and the fees charged by Broadstreet to fully understand the total amount of fees charged and to evaluate the cost of advisory services being provided.

In addition to the payment of an advisory fee to our firm, Clients investing in alternative investments will pay a separate fee to underlying investment managers, and certain other fees and expenses of underlying investment funds in which the client invests. Investors in alternative investments may also pay carried interest, performance or incentive allocations to an underlying manager or sponsor of an underlying investment fund in which they invest, all of which contribute to the overall cost of the investment.

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Billing on Margin: Unless otherwise agreed in writing, the gross amount of assets in the client's account, including margin balances, are included as part of assets under management for purposes of calculating the firm's advisory fee. Clients should note that this practice will increase total assets under management used to calculate advisory fees which will in turn increase the amount of fees collected by our firm. This practice creates a conflict of interest in that our firm has an incentive to use margin in order to increase the amount of billable assets. At all times, the firm and its Associated Persons strive to uphold their fiduciary duty of fair dealing with clients. Clients are free to restrict the use of margin by our firm. However, clients should note that any restriction on the use of margin may negatively impact an account's performance in a rising market.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

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

Performance-based fees are based on a share of capital gains on or capital appreciation of the Client's assets. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account(s).

Types of Clients - Item 7

We generally offer investment advisory services to individuals, trusts, estates, charitable organizations, corporations and other business entities.

Broadstreet generally requires a minimum account size of $100,000 for advisory accounts. However, from time-to-time, in its sole discretion, Broadstreet may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other factors.

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

Our investment strategies and advice may vary depending on your specific financial situation. As such, we determine investments and allocations based on your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

We may use one or more of the following ***methods of analysis*** when providing investment advice to you:

- Fundamental Analysis – Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g., machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries, and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security. The risk associated with fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

- Technical Analysis – Technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based on historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

- *Cyclical Analysis* – Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company. The primary risks with cyclical analysis are similar to those of technical analysis.

- *Charting Analysis* – Charting analysis involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index, or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends. The primary risk of charting analysis is that it may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

We may use one or more of the following ***investment strategies*** when advising you on investments:

- *Long-Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking up" assets that may be better utilized in the short-term in other investments.

- *Short-Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. Many factors can affect financial market performance in the short term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of time.

- *Option Writing* – an option is the right either to buy or sell a specified amount or value of a particular underlying investment instrument at a fixed price (i.e. the “exercise price”) by exercising the option before its specified expiration date. Options giving you the right to buy are called “call” options. Options giving you the right to sell are called “put” options. When trading options on behalf of a Client, we generally use covered options. Covered options involve options trading when you own the underlying instrument on which the option is based. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses

- Trading – securities are sold within 30 days. The principal type of risk associated with trading is market risk. There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Other factors, such as changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic, or monetary policies, may affect investments as well. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary, and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of government intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.

- *Margin Transactions* – margin strategies allow an investor to purchase securities on credit and to borrow on securities already in their custodial account. Interest is charged on any borrowed funds for the period that the loan is outstanding. When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your broker-dealer. If you intend to borrow funds in connection with your account, you will be required to open a margin account, which will be carried by the broker-dealer of your account. The securities purchased in such an account are the broker-dealer's collateral for its loan to you. If the securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and, as a result, a brokerage firm is required to take action, such as issue a margin call and/or sell securities or other assets in your accounts, in order to maintain necessary level of equity in the account. It is important that you fully understand the risks involved in trading securities on margin, which are applicable to any margin account that you may maintain, including any margin Account that may be established as a part of our advisory services and held by your broker-dealer. These risks include the following:
    1. You can lose more funds than you deposit in your margin account.
    2. The broker-dealer can force the sale of securities or other assets in your account.
    3. The broker-dealer can sell your securities or other assets without contacting you.
    4. You may not be able to choose which securities or other assets in your margin account are liquidated or sold to meet a margin call.
    5. The broker-dealer may move securities held in your cash account to your margin account and pledge the transferred securities.
    6. You may not be entitled to an extension of time on a margin call.

Investing in securities involves the risk of loss that clients should be prepared to bear. Clients should fully understand the nature of the contractual relationship(s) into which they are entering and the extent of their risk exposure. Certain investment strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

Recommendation of Particular Types of Securities
As disclosed under the "Advisory Business" section in this Brochure, we provide advice on various types of securities and we do not necessarily recommend one particular type of security over another since each Client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Equities: Investments in equities generally refer to buying shares of stocks by an individual or firm in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Risks Associated with Fixed Income: When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

Risks Associated with Investing in Mutual Funds: Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates on a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are “no load” and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency. Detailed information about the risks associated with each ETF is provided in the relevant ETF’s prospectus.

Risks Associated with Investing in Private Funds: Private investment funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the client's investment in these companies.

Risks Associated with Investing in Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Risks Associated with Investing in Alternative Investments: We may recommend to qualified clients the use of alternative investments such as investments in real estate, private equity, or hedge funds. We may also recommend a direct investment into a private company. Investments in such "alternative assets" are generally illiquid, which will impair the ability of the client to exit such investments in times of adversity. Alternative investments may utilize highly speculative investment techniques, including leverage, highly concentrated portfolios, senior and/or subordinated securities positions, control positions and illiquid investments. In addition, they may utilize derivative instruments to attempt to hedge the risks associated with certain of their investments. Transactions in such derivative instruments may expose the assets of investment funds to the risks of material financial loss, which may in turn adversely affect the financial results of the client.

Concentrated Position Risk: Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors, certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that preferred securities are designed to make fixed payments based on a percentage of their par value and are senior to common stock. Like bonds, the market value of preferred securities is sensitive to changes in interest rates as well as changes in issuer credit quality. Preferred securities, however, are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Preferred securities that are in the form of preferred stock also differ from bonds in that dividends on preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors, and bondholders generally have protections that preferred stockholders do not have, such as indentures that are designed to guarantee payments – subject to the credit quality of the issuer – with terms and conditions for the benefit of bondholders. In contrast preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. Another difference is that preferred dividends are paid from the issue's after-tax profits, while bond interest is paid before taxes.

Risks Associated with Investing in Inverse and Leveraged Funds: Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some Inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inversed funds, which may amplify gains and losses.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the Index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly volatile and not suitable for all investors. They provide the potential for significant losses.

Risks Associated with Investing in Buffer ETFs: Buffer ETFs are also known as defined-outcome ETFs since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks, and features of these complex products.

Risks Associated with Investing in Structured Products: Certain structured products enable the investor to acquire interests in a pool of securities without the brokerage and other expenses associated with individually holding the same securities, investors in structured products generally pay their share of the structured product's administrative and other expenses. Although it is difficult to predict whether the prices of assets underlying structured products will rise or fall, these prices (and, therefore, the prices of structured products) will be influenced by the same types of political and economic events that affect issuers of securities and capital markets generally. If the issuer of a structured product uses shorter-term financing to purchase longer-term securities, the issuer may be forced to sell its securities at below-market prices if it experiences difficulty in obtaining short-term financing, which may adversely affect the value of the structured products. Certain structured products may be thinly traded or have a limited trading market.

Structured Notes: Below are some specific risks related to the structured notes recommended by our firm:

- *Complexity*: Structured notes are complex financial instruments. Clients should understand the reference asset(s) or index(es) and determine how the note's payoff structure incorporates such reference asset(s) or index(es) in calculating the note's performance. This payoff calculation may include leverage multiplied by the performance of the reference asset or index, protection from losses should the reference asset or index produce negative returns, and/or fees. Structured notes may have complicated payoff structures that can make it difficult for clients to accurately assess their value, risk and potential for growth through the term of the structured note. Determining the performance of each note can be complex and this calculation can vary significantly from note to note depending on the structure. Notes can be structured in a wide variety of ways. Payoff structures can be leveraged, inverse, or inverse-leveraged, which may result in larger returns or losses. Clients should carefully read the prospectus for a structured note to fully understand how the payoff on a note will be calculated and discuss these issues with our firm.
- *Market risk*. Some structured notes provide for the repayment of principal at maturity, which is often referred to as "principal protection." This principal protection is subject to the credit risk of the issuing financial institution. Many structured notes do not offer this feature. For structured notes that do not offer principal protection, the performance of the linked asset or index may cause clients to lose some, or all, of their principal. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in equity or commodity prices, changes in interest rates or foreign exchange rates, and/or market volatility.
- *Issuance price and note value*: The price of a structured note at issuance will likely be higher than the fair value of the structured note on the date of issuance. Issuers now generally disclose an estimated value of the structured note on the cover page of the offering prospectus, allowing investors to gauge the difference between the issuer's estimated value of the note and the issuance price. The estimated value of the notes is likely lower than the issuance price of the note to investors because issuers include the costs for selling, structuring, and/or hedging the exposure on the note in the initial price of their notes. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.
- *Liquidity*: The ability to trade or sell structured notes in a secondary market is often very limited, as structured notes (other than exchange-traded notes known as ETNs) are not listed for trading on securities exchanges. As a result, the only potential buyer for a structured note may be the issuing financial institution's broker-dealer affiliate or the broker-dealer distributor of the structured note. In addition, issuers often specifically disclaim their intention to repurchase or make markets in the notes they issue. Clients should, therefore, be prepared to hold a structured note to its maturity date or risk selling the note at a discount to its value at the time of sale.
- *Credit risk*: Structured notes are unsecured debt obligations of the issuer, meaning that the issuer is obligated to make payments on the notes as promised. These promises, including any principal protection, are only as good as the financial health of the structured note issuer. If the structured note issuer defaults on these obligations, investors may lose some, or all, of the principal amount they invested in the structured notes as well as any other payments that may be due on the structured notes.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value, or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of the unauthorized use of their personal information. While our firm has established business continuity plans, incident response plans, and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks also are present for issuers of securities in which we invest, which could result in material adverse consequences for such issuers and may cause a client's investment in such securities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

Cryptocurrency Risk*: Cryptocurrency (e.g., bitcoin and ether), often referred to as “virtual currency”, “digital currency,” or “digital assets,” is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm’s clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm’s clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client’s investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network’s long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm’s clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and “flow-through” to the underlying investors.

*Broadstreet does not recommend or invest in cryptocurrencies. This disclosure is provided to assist clients with understanding some of the risks associated with these types of investments should clients make such investments on their own accord.

Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or of the integrity of our management. Neither we nor our management persons have a history of reportable material legal or disciplinary events.

Other Financial Industry Activities or Affiliations - Item 10

Neither Broadstreet nor any of its management persons is registered as a futures commission merchant, a commodity trading adviser, or a commodity pool operator, nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as any of these types of firms. Further, none of our management persons are registered as or currently seeking registration as associated persons of any of these types of firms.

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

Description of Our Code of Ethics
Broadstreet has adopted a Code of Ethics (the “Code”) to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Broadstreet’s policies and procedures developed to protect Client’s interests in relation to the following topics:

- The duty at all times to place the interests of Clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee’s position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of Clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Broadstreet’s Code of Ethics is available upon request to our firm at (914) 582-6536.

Personal Trading Practices
At times, Broadstreet and/or its related persons may take positions in the same securities as Clients, which may pose a conflict of interest with Clients. In an effort to uphold our fiduciary duties to Clients, Broadstreet and its related persons will generally be “last in” and “last out” for the trading day when trading occurs in close proximity to Client trades. Front running (trading shortly ahead of Clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosure will be made to the Client(s) at the time of trading. Incidental

trading not deemed to be a conflict (e.g., a purchase or sale that is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price) would not be deemed a material conflict requiring disclosure at the time of trading.

Brokerage Practices - Item 12

We recommend the brokerage and custodial services of several unaffiliated qualified custodians. We believe that recommended broker-dealers/custodians provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers/custodians, including the value of research provided, the company's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. In recognition of the value of research services and additional brokerage products and services recommended broker-dealers/custodians provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

At this time, we primarily recommend the services of Charles Schwab & Co., Inc., along with the services of Equity Trust Company and Kingdom Trust.

Charles Schwab & Co., Inc.
Broadstreet has an institutional custodial relationship with Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC. Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and will buy and sell securities in your account(s) upon our instructions. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and you will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

Schwab generally does not charge you separately for custody services, but is compensated by charging commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. Clients who have opened a Wrap Program account do not pay any separate fees to Schwab because Broadstreet's fee is inclusive of all fees paid to Schwab.

<u>Research and Other Soft Dollar Benefits Received from Schwab</u>
Although not considered "soft dollar" compensation, Broadstreet may receive some economic benefits from Schwab Advisor Services in the form of access to its institutional brokerage, trading, custody, reporting and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Below is a detailed description of Schwab's support services:

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to Client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our Clients' accounts; and
- assist with back-office functions, recordkeeping, and Client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Equity Trust Company and Kingdom Trust
We recommend Equity Trust Company and Kingdom Trust as custodian of record, primarily for self-directed individual retirement accounts and solo 401(k)s. Equity Trust Company and Kingdom Trust provide our Clients with access to a broad range of alternative investment products such as promissory notes, precious metals, real estate and private equity investments, along with traditional asset classes such as equities, bonds, mutuals funds and ETFs. While Broadstreet may receive access to certain benefits through our recommendation of Equity Trust Company and Kingdom Trust, we do not receive soft dollars. Equity Trust Company and Kingdom Trust provide us products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include limited scope investment research. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Equity Trust Company and Kingdom Trust. In addition to investment research, Equity Trust Company and Kingdom Trust also make available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Broadstreet understands its duty for best execution and considers all factors in making recommendations to Clients. These research services may be useful in servicing all Broadstreet Clients, and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Broadstreet may not always obtain the lowest commission rate, Broadstreet believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Brokerage for Client Referrals
We do not receive Client referrals from broker-dealers and custodians with which we have an institutional advisory arrangement. Also, we do not receive other benefits from a broker-dealer in exchange for Client referrals.

Directed Brokerage
The Client may direct brokerage to a specified broker-dealer other than the firm recommended by Broadstreet. In the event that a client directs Broadstreet to use a particular broker-dealer, the firm may not be authorized under these circumstances to negotiate commissions and may not be able to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to Clients who direct the firm to use a particular broker-dealer and those who do not.

Trade Aggregation/Block Trading
Broadstreet may aggregate transactions in equity and fixed income securities for a Client with other Clients to improve the quality and cost of execution. Transactions will be aggregated only for accounts held at the same broker dealer/custodian, using such broker dealer's trading platform. When transactions are aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the Client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Broadstreet may determine not to aggregate transactions, for example, based on the size of the trades, the number of Client accounts, the timing of the trades, and the liquidity of the securities. If the firm does not aggregate orders, some Clients purchasing securities around the same time may receive a less favorable price than other Clients. This means that this practice of not aggregating may cost Clients more money. Broadstreet and/or its Associated Persons may participate in block trades with Clients; however, Broadstreet and/or its Associated Persons will not participate on a pro rata basis for partial fills.

Review of Accounts - Item 13

Account Reviews
Broadstreet monitors account holdings and portfolio performance on a continuous basis. Broadstreet offers wealth management clients an in-person portfolio review meeting on an annual basis. This meeting maybe conducted virtually. Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the Client's financial situation or investment objectives, or upon Client request. Reviews are conducted by the Associated Person assigned to the client relationship

A financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

Clients will receive statements directly from their account custodian(s) on at least a quarterly basis.

Client Referrals and Other Compensation - Item 14

Broadstreet has brokerage and clearing arrangements with Schwab, Equity Trust Company and Kingdom Trust, and the we may receive additional benefits from these firms in the form of electronic delivery of Client information, electronic trading platforms, institutional trading support, proprietary and/or third-party research, continuing education, practice management advice, and other services provided by custodians for the benefit of investment advisory Clients. Please refer to item 12 above for more information about the receipt of additional benefits from broker-dealers/account custodians.

Non-employee (outside) consultants, individuals, and/or entities, who refer prospective clients to Broadstreet may receive compensation from the firm. Such arrangements will comply with the requirements of the relevant jurisdictions, including the requirement that the compensation arrangement is disclosed to the prospective client at the time of the referral. Referral compensation will only be paid in jurisdictions in which the relevant parties are registered or exempt from registration requirements. Under these arrangements, clients will not pay additional fees because of this referral arrangement.

Custody - Item 15

Where we directly debit your account(s) for the payment of our advisory fees, Broadstreet is deemed to exercise custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. The custodian holding Client assets will not verify the calculation of the advisory fees. You should carefully review account statements for accuracy. If you have questions regarding your account or if you did not receive a statement from your custodian, please contact our firm at (914) 582-6536.

Investment Discretion - Item 16

Broadstreet offers Portfolio Management Services on a discretionary basis only. Clients must grant discretionary authority in the management agreement. Discretionary authority extends to the types and amounts of securities to be bought and sold in Client accounts. Apart from the ability to withdraw management fees, Broadstreet does not have the ability to withdraw funds or securities from the Client's account. The Client provides Broadstreet discretionary authority via a limited power of attorney in the management agreement and in the contract between the Client and the custodian.

If you wish, you may limit our discretionary authority, for example, by setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Voting Client Securities - Item 17

Broadstreet does not vote proxies. It is the Client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Financial Information - Item 18

In this section, we are required to provide you with certain financial information or disclosures about Broadstreet's, financial condition. Broadstreet does not require the prepayment of over $1,200, six or more months in advance. Additionally, Broadstreet has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients, and it has not been the subject of a bankruptcy proceeding.

Requirements of State-Registered Advisers - Item 19

This section is not applicable because our firm is SEC registered.

Broadstreet Privacy Notice

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

INFORMATION WE COLLECT
Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet") must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE
We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to nonpublic personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

ACCURACY

Broadstreet strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals. If you have any questions regarding your privacy, please contact our firm at (914) 582-6536.

Nicholas Mancini

Personal CRD Number: 5317614
President / Chief Compliance Officer / Investment Adviser Representative

Broadstreet Global Advisors, Inc.

361 Route 202
Somers, NY 10589
Phone: (914) 582-6536
Fax: (914) 500-2375
Email: nick@broadstreetglobaladvisors.com
www.broadstreetglobaladvisors.com

November 3, 2023

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Nicholas Mancini that supplements the Disclosure Brochure of Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet"), a copy of which you should have received. Please contact Broadstreet's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Nicholas Mancini is available on the SEC's website at www.adviserinfo.sec.gov. Mr. Mancini's CRD number is 5317614.

Educational Background and Business Experience - Item 2

Nicholas Mancini
Year of Birth: 1978
Formal Education After High School:

- Manhattan College, B.S., Computer Science3, 2000

Business Background for the Previous Five Years:

- Broadstreet Global Advisors, Inc., President/CCO/IAR, 01/2023 to Present
- IT Portfolio Advisors, Founder, 12/2021 to Present
- Wolfe Research, LLC, Chief Technology Officer, 06/2021 to 12/2021
- MIO Partners, Inc., Director of IT Operations, 10/2018 to 06/2021
- Agio, Chief Technology Officer, 04/2014 to 10/2018

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Mancini and Broadstreet. Mr. Mancini has no history of reportable legal or disciplinary events.

Other Business Activities - Item 4

Nicholas Mancini is the Founder of IT Portfolio Advisors, a technology consultant providing executive-level advisor/consultative services to companies on the investment and operations of their technology and cyber security systems and staff. Mr. Mancini anticipates spending approximately 50% of his time on this outside business activity.

Additional Compensation – Item 5

Apart from the receipt of compensation for the activities disclosed under Item 4 above, Mr. Mancini does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

Supervision - Item 6

Mr. Mancini is the President, Chief Compliance Officer, and an Investment Adviser Representative of Broadstreet. In this capacity, Mr. Mancini is responsible for the overall management of the firm and supervision of the firm's personnel, implementation of the firm's compliance program, and monitoring of client portfolios for investment objectives and other supervisory reviews.

Broadstreet has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Mancini at (914) 582-6536 or nick@broadstreetglobaladvisors.com to obtain a copy of our firm's code of ethics.

Additionally, Broadstreet is subject to regulatory oversight by various agencies. These agencies require registration by Broadstreet and its investment adviser representatives. As a registered entity, Broadstreet is subject to examinations by regulators, which may be announced or unannounced. Broadstreet is required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.

Mark Reinstein

Personal CRD Number: 1486887
Investment Adviser Representative

Broadstreet Global Advisors, Inc.

dba

Innovative Investment Management

Supervised From:
361 Route 202
Somers, NY 10589
Phone: (914) 582-6536
Fax: (914) 500-2375
www.broadstreetglobaladvisors.com

Located At:
3447 Pelham Road, Ste. 203
Greenville, SC 29615

Phone: (864) 551-2776
Email: mark@innovativeinvestmentmanagement.com
mark@ininmgt.com
www.innovativeinvestmentmanagement.com

November 3, 2023

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Mark Reinstein that supplements the Disclosure Brochure of Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet"), a copy of which you should have received. Please contact Broadstreet's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Mark Reinstein is available on the SEC's website at www.adviserinfo.sec.gov. Mr. Reinstein's CRD number is 1486887.

Educational Background and Business Experience - Item 2

Mark Reinstein
Year of Birth: 1962
Formal Education After High School:
- University of Georgia, B.A., 1984

Business Background for the Previous Five Years:
- Broadstreet Global Advisors, Inc., Investment Adviser Representative, 06/2023 to Present
- Premium 72 Capital, Investment Adviser Representative, 01/2021 to 06/2023
- Dempsey Lord Smith, LLC, Registered Representative, 06/2022 to 04/2023
- Cabot Lodge Securities LLC, Registered Representative, 05/2019 to 12/2021
- Sandlapper Wealth Management, LLC, President/Advisor, 01/2015 to 12/2020
- Sandlapper Securities, LLC, Registered Representative, 06/2014 to 05/2019

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Reinstein and Broadstreet. Mr. Reinstein has no history of reportable legal or disciplinary events.

Other Business Activities - Item 4

Mr. Reinstein is also licensed as an independent insurance agent. Mr. Reinstein will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by Mr. Reinstein is separate to our advisory fees. This practice presents a conflict of interest because Mr. Reinstein provides investment advice on behalf of our firm and insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. Please also be advised that Mr. Reinstein strives to put his clients' interest first and foremost, and clients are not obligated to purchase insurance products through Mr. Reinstein.

Mr. Reinstein spends approximately 5% of his professional time on insurance-related activities.

Additional Compensation – Item 5

Apart from the receipt of compensation for the activities disclosed under Item 4 above, Mr. Reinstein does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

Supervision - Item 6

Mr. Reinstein is an Investment Adviser Representative of Broadstreet. In this capacity, Mr. Reinstein is responsible for monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Reinstein is supervised by Nicholas Mancini, President and Chief Compliance Officer of Broadstreet. Mr. Mancini can be reached by calling the phone number listed on the cover page of this brochure.

Broadstreet has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Reinstein at (864) 551-2776 or mark@broadstreetglobaladvisors.com to obtain a copy of our firm's code of ethics.

Additionally, Broadstreet is subject to regulatory oversight by various agencies. These agencies require registration by Broadstreet and its investment adviser representatives. As a registered entity, Broadstreet is subject to examinations by regulators, which may be announced or unannounced. Broadstreet is required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.

Debinder Deshmukh

Personal CRD Number: 5203309
Investment Adviser Representative

Broadstreet Global Advisors, Inc.

Supervised From:
361 Route 202
Somers, NY 10589
Phone: (914) 582-6536
Fax: (914) 500-2375
www.broadstreetglobaladvisors.com

Located At:
3880 Bird Rd., Apt #125
Miami, FL 33146

Phone: (786) 495-0415
Email: debinder@broadstreetglobaladvisors.com

November 3, 2023

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Debinder Deshmukh that supplements the Disclosure Brochure of Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet"), a copy of which you should have received. Please contact Broadstreet's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Debinder Deshmukh is available on the SEC's website at www.adviserinfo.sec.gov. Mr. Deshmukh's CRD number is 5203309.

Educational Background and Business Experience - Item 2

Debinder Deshmukh
Year of Birth: 1980
Formal Education After High School:
- Osmania University, M.B.A., 2003

Business Background for the Previous Five Years:
- Broadstreet Global Advisors, Inc., Investment Adviser Representative, 08/2023 to Present
- Kingswood Capital Partners, LLC, Mass Transfer, 05/2023 to 08/2023
- Kingswood Wealth Advisors LLC, Investment Advisor, 01/2022 to 08/2023
- Benchmark Investments Inc, Registered Representative, 04/2021 to 08/2023
- Benchmark Advisory Services LLC, Investment Advisor, 04/2021 to 01/2022
- Ameriprise Financial Services, Inc., Registered Representative, 08/2015 to 04/2021

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Deshmukh and Broadstreet. Mr. Deshmukh has no history of reportable legal or disciplinary events.

Other Business Activities - Item 4

Mr. Deshmukh is not involved in any other reportable business activities.

Additional Compensation – Item 5

Mr. Deshmukh does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

Supervision - Item 6

Mr. Deshmukh is an Investment Adviser Representative of Broadstreet. In this capacity, Mr. Deshmukh is responsible for monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Deshmukh is supervised by Nicholas Mancini, President and Chief Compliance Officer of Broadstreet. Mr. Mancini can be reached by calling the phone number listed on the cover page of this brochure.

Broadstreet has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Deshmukh at (786) 495-0415 or at debinder@broadstreetglobaladvisors.com to obtain a copy of our firm's code of ethics.

Additionally, Broadstreet is subject to regulatory oversight by various agencies. These agencies require registration by Broadstreet and its investment adviser representatives. As a registered entity, Broadstreet is subject to examinations by regulators, which may be announced or unannounced. Broadstreet is required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.

Paul D. Pizzuti

Personal CRD Number: 6301085
Investment Adviser Representative

Broadstreet Global Advisors, Inc.

dba

Innovative Investment Management

Supervised From:
361 Route 202
Somers, NY 10589
Phone: (914) 582-6536
Fax: (914) 500-2375
www.broadstreetglobaladvisors.com

Located At:
3447 Pelham Road, Suite 203
Greenville, SC 29615

Phone: (864) 501-8954
Email: paul@innovativeinvestmentmanagement.com
www.innovativeinvestmentmanagement.com

November 3, 2023

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Paul D. Pizzuti that supplements the Disclosure Brochure of Broadstreet Global Advisors, Inc. (hereinafter "Broadstreet"), a copy of which you should have received. Please contact Broadstreet's Chief Compliance Officer if you did not receive the Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Paul D. Pizzuti is available on the SEC's website at www.adviserinfo.sec.gov. Mr. Pizzuti's CRD number is 6301085.

Educational Background and Business Experience - Item 2

Paul D. Pizzuti
Year of Birth: 1991
Formal Education After High School:

- Campbell University, Masters of Business Administration, 2014
- BBA Trust and Wealth Management, Minor Financial Planning, 2014

Business Background for the Previous Five Years:

- Broadstreet Global Advisors, Inc., Investment Adviser Representative, 10/2023 to Present
- AGIA, Agent, 12/2022 to 10/2023
- Valic Financial Advisors, Inc., Registered Representative, 06/2014 to 10/2023

Professional Designations:
CERTIFIED FINANCIAL PLANNER™ professional (CFP®)
I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP®

professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Disciplinary Information - Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Pizzuti and Broadstreet. Mr. Pizzuti has no history of reportable legal or disciplinary events.

Other Business Activities - Item 4

Mr. Pizzuti is also licensed as an independent insurance agent. Mr. Pizzuti will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by Mr. Pizzuti is separate to our advisory fees. This practice presents a conflict of interest because Mr. Pizzuti provides investment advice on behalf of our firm and insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. Please also be advised that Mr. Pizzuti strives to put his clients' interest first and foremost, and clients are not obligated to purchase insurance products through Mr. Pizzuti.

Mr. Pizzuti spends approximately 5% of his professional time on this outside business activities.

Additional Compensation – Item 5

Apart from the receipt of compensation from the outside business activities listed under Item 4 above, Mr. Pizzuti does not receive additional compensation or economic benefits from third party sources in connection with his advisory activities.

Supervision - Item 6

Mr. Pizzuti is an Investment Adviser Representative of Broadstreet. In this capacity, Mr. Pizzuti is responsible for monitoring of client portfolios for investment objectives and other supervisory reviews. Mr. Pizzuti is supervised by Nicholas Mancini, President and Chief Compliance Officer of Broadstreet. Mr. Mancini can be reached by calling the phone number listed on the cover page of this brochure.

Broadstreet has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Pizzuti at (864) 501-8954 or at paul@broadstreetglobaladvisors.com to obtain a copy of our firm's code of ethics.

Additionally, Broadstreet is subject to regulatory oversight by various agencies. These agencies require registration by Broadstreet and its investment adviser representatives. As a registered entity, Broadstreet is subject to examinations by regulators, which may be announced or unannounced. Broadstreet is required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

Requirements for State-Registered Advisers - Item 7

This section is not applicable because our firm is SEC registered.