

Item 1 Cover Page

A.

John A. Pieroni

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about John A. Pieroni that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about John A. Pieroni is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

John A. Pieroni was born in 1969. Mr. Pieroni graduated from SUNY at Buffalo, School of Architecture & Planning, in 1991, with a degree in Environmental Design. Mr. Pieroni has served as a Senior Wealth Manager and Partner of WNY Asset Management, LLC since July of 2003. He became Managing Partner of WNY Asset Management, LLC in January of 2013. Mr. Pieroni has also been associated as a registered representative with Cadaret, Grant & Co. since January 2001.

John A. Pieroni has been a CERTIFIED FINANCIAL PLANNER™ since May 2003. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of*

Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Pieroni is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Pieroni in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Pieroni that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Pieroni. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Pieroni. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund

purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Pieroni is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agents**. Mr. Pieroni, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Pieroni to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Pieroni that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Pieroni. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

Robert A. Castiglione

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
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Additional information about Robert A. Castiglione is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Robert A. Castiglione was born in 1975. Mr. Castiglione graduated from Canisius College in 1997 with a degree in Finance, and from Boston College in 2002 with a Masters in Business Administration degree. Mr. Castiglione has served as a Senior Wealth Manager and a Registered Principal of WNY Asset Management, LLC since February of 2004. He became a Partner in January of 2007. Mr. Castiglione has also been associated as a registered representative with Cadaret, Grant & Co. since February 2004.

Robert Castiglione has been a CERTIFIED FINANCIAL PLANNER™ since May 2006. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
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- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Castiglione is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Castiglione in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
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 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Castiglione. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities

commission business conducted by Mr. Castiglione is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agents**. Mr. Castiglione, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Castiglione to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Castiglione that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Castiglione. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

A.

Ronald M. Lojacono

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

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Additional information about Ronald M. Lojacono is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Ronald M. Lojacono was born in 1967. Mr. Lojacono graduated from Medaille College in 1990 with a degree in Business Administration. Mr. Lojacono has been employed as Senior Wealth Manager of WNY Asset Management, LLC since August of 2005. He became a Partner in May of 2011. Mr. Lojacono has also been associated as a registered representative with Cadaret, Grant & Co. since August 2005.

Ronald M. Lojacono has been a CERTIFIED FINANCIAL PLANNER™ since January of 2003. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning

services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Lojacono is a registered representative of Cadaret, Grant & Co. ("Cadaret"), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Lojacono in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Lojacono that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Lojacono. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Lojacono. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Lojacono is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.
- B. **Licensed Insurance Agent**. Mr. Lojacono, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Lojacono to purchase insurance products

on a commission basis. **Conflict of Interest**: The recommendation by Mr. Lojacono that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Lojacono. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents.

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Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

A.

Eugene P. O'Connor, Jr.

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221

B.

This Brochure Supplement provides information about Eugene P. O'Connor, Jr. that supplements the WNY Asset Management, LLC, Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Eugene P. O'Connor, Jr. is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Eugene P. O'Connor, Jr. was born in 1963. Mr. O'Connor graduated from Notre Dame in 1987 with a Bachelor of Arts degree in History. Since June of 2012, Mr. O'Connor has been a Senior Wealth Manager at WNY Asset Management, LLC and a registered representative at Cadaret, Grant & Co. From May of 2004 to June of 2012, Mr. O'Connor was a financial adviser at Merrill Lynch.

Eugene P. O'Connor, Jr. has been a CERTIFIED FINANCIAL PLANNER™ since February of 2015. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

A. **Registered Representative of Cadaret** Mr. O’Connor is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. O’Connor in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. O’Connor that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. O’Connor. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
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commission business conducted by Mr. O'Connor is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agent**. Mr. O'Connor, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. O'Connor to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. O'Connor that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. O'Connor. Clients are reminded that they may purchase insurance products recommended by Mr. O'Connor through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

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A.

Evan S. Wardner

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
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Additional information about Evan S. Wardner is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Evan S. Wardner was born in 1956. Mr. Wardner graduated from SUNY at Buffalo in 1981 with a Bachelor of Science (BS) in Chemistry, and in 1983 with a Masters of Business Administration (MBA) with a concentration in Financial Planning and Control. Since May of 2013, Mr. Wardner has been a Senior Wealth Manager at WNY Asset Management, LLC, and a registered representative at Cadaret, Grant & Co. From February of 2012 to May of 2013, Mr. Wardner was an Energy Consultant with Energy Solutions USA, LLC. From September of 2012 to May of 2013, Mr. Wardner was a professor at Niagara University. From August of 1998 to September of 2012, Mr. Wardner was a registered representative with Linsco/Private Ledger Corp. From October of 2006 to December of 2011, Mr. Wardner was Director of CFP Board-Registered Degree and Certificate Programs at Bryant & Stratton College.

Mr. Wardner has been a CERTIFIED FINANCIAL PLANNER™ since July of 1989. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of*

Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

A. **Registered Representative of Cadaret** Mr. Wardner is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Wardner in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mr. Wardner that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Wardner. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Wardner. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities

commission business conducted by Mr. Wardner is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agent**. Mr. Wardner, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Wardner to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Wardner that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Wardner. Clients are reminded that they may purchase insurance products recommended by Mr. Wardner through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

David D. Jarosz

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance

Officer 6500 Sheridan Drive, Suite 200

Williamsville, NY 14221

www.wnyasset.com

B.

This Brochure Supplement provides information about David D. Jarosz that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about David D. Jarosz is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

David D. Jarosz was born in 1966. Mr. Jarosz has not received any higher education degrees after high school. Mr. Jarosz has been an Investment Advisor Representative of WNY Asset Management, LLC since October 2017.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Jarosz is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Jarosz in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Jarosz that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Jarosz. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Jarosz. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Jarosz is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agents**. Mr. Jarosz, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Jarosz to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Jarosz that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Jarosz. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

Debra A. Brown

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about Debra A. Brown that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Debra A. Brown is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Debra A. Brown was born in 1991. Mrs. Brown graduated from Niagara University in 2012 with a Bachelor of Science degree in Management, and in 2014 with a Master of Business Administration degree in Finance. Mrs. Brown has been a Wealth Manager of WNY Asset Management, LLC since January 2015. From August 2014 to December 2014, Mrs. Brown was a Paraplanner with WNY Asset Management, LLC. Mrs. Brown has also been a registered representative of Cadaret, Grant & Co. since August 2014. From December of 2013 to June of 2014, Mrs. Brown was a registered representative of First Investors Corporation. From July of 2009 to August of 2014, Mrs. Brown was a graduate staff assistant at Niagara University.

Mrs. Brown has been a CERTIFIED FINANCIAL PLANNER™ since September 2016. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of*

Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

A. **Registered Representative of Cadaret** Mrs. Brown is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mrs. Brown in her individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.

1. **Conflict of Interest** The recommendation by Mrs. Brown that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mrs. Brown. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mrs. Brown. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the

period that the client maintains the mutual fund investment. The securities commission business conducted by Mrs. Brown is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agents.** Mrs. Brown, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mrs. Brown to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mrs. Brown that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mrs. Brown. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

Laureen Syta

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance
Officer 6500 Sheridan Drive, Suite 200
Williamsville, NY 14221

www.wnyasset.com

B.

This Brochure Supplement provides information about Laureen Syta that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Laureen Syta is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Laureen Syta was born in 1971. Ms. Syta graduated from Empire State College, in 2007 with a Bachelor's Degree of Business. Ms. Syta is an Investment Adviser Representative of WNY Asset Management, LLC started April 2021 to Present. Ms. Syta has also been associated as Associate Wealth Manager with Cadaret, Grant & Co., Inc. since April 2021 to Present; And was a Client Service Associate at WNY Asset Management since August 2017 to April 2021. Ms. Syta had been formerly associated as Business Analyst with Relationship Velocity from August 2015 to July 2017 and from November 2014 to August 2015 she was unemployed. And thus Ms. Syta worked as a Director of Operations at Waring Financial Group from November 2012 to November 2014 and formerly worked as a Relationship Manager at Key Bank from April 2010 to May 2012.

Laureen Syta has been a CERTIFIED FINANCIAL PLANNER™ since February 2005. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 76,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional*

Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mrs. Syta is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mrs. Syta in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mrs. Syta that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mrs. Syta. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mrs. Syta. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted

by Mrs. Syta is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.

- B. **Licensed Insurance Agents**. Mrs. Syta, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mrs. Syta to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mrs. Syta that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mrs. Syta. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Lauren Syta is a Notary public.

Lauren Syta is a board member at Foundation of the Roman Catholic Diocese of Buffalo Board.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)- 7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

Daniel Gartland

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement

Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance
Officer 6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about Daniel Gartland that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel Gartland is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Education Background and Business Experience

Daniel Gartland was born in 1987. Mr. Gartland graduated from Clarkson University, in 2009 with a Bachelor of Science in Interdisciplinary Engineering & Management. Mr. Gartland is an Investment Adviser Representative of WNY Asset Management, LLC started January 2022 to Present. Mr. Gartland has also been associated as Associate Wealth Manager with WNY Asset Management, LLC Inc. since August 2021 to Present; and was an RSS at Cadaret Grant & Co., Inc. since August 2021 to Present. Mr. Gartland had been formerly associated as Senior Business Associate with Citigroup from March 2020 to August 2021. Thus Mr. Gartland worked as a Fulfillment Center Team Member at Amazon from January 2020 to March 2020. Mr. Gartland was unemployed from August 2019 to January 2020. Mr. Gartland worked as Operations at Citigroup from February 2010 to August 2019.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Gartland is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Gartland in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Gartland that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Gartland. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Gartland. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Gartland is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Licensed Insurance Agents**. Mr. Gartland, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Gartland to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Gartland that a client purchase an insurance commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Gartland. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.

Item 1 Cover Page

A.

William D. Mistretta

WNY Asset Management, LLC

ADV Part 2B, Brochure Supplement
Dated: March 16, 2022

Contact: Zachary Shroyer, Chief Compliance Officer
6500 Sheridan Drive, Suite 200
Williamsville, NY 14221
www.wnyasset.com

B.

This Brochure Supplement provides information about William D. Mistretta that supplements the WNY Asset Management, LLC Brochure; you should have received a copy of that Brochure. Please contact Zachary Shroyer, Chief Compliance Officer, if you did *not* receive WNY Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about William D. Mistretta is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

William D. Mistretta was born in 1991. Mr. Mistretta graduated from University at Buffalo, in 2014 with Bachelor's Accounting and Master's Accounting in 2015. Mr. Mistretta has served as an Investment Adviser Representative of WNY Asset Management, LLC since January 2022. Mr. Mistretta has also been a registered representative of Cadaret, Grant & Co., Inc. since October 2021.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

- A. **Registered Representative of Cadaret** Mr. Mistretta is a registered representative of Cadaret, Grant & Co. (“*Cadaret*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Mistretta in his individual capacity as a registered representative of *Cadaret*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Mistretta that a client purchase a securities commission product presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Mistretta. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Zachary Shroyer, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
 2. **Commissions** In the event the client chooses to purchase investment products through *Cadaret*, brokerage commissions will be charged by *Cadaret* to effect securities transactions, a portion of which commissions shall be paid by *Cadaret* to Mr. Mistretta. The brokerage commissions charged by *Cadaret* may be higher or lower than those charged by other broker-dealers. In addition, *Cadaret*, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Mistretta is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- B. **Accountant** Mr. Mistretta is an account. William D. Mistretta prepares tax returns during tax filing season.

Item 5 Additional Compensation

None.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Zachary Shroyer, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Shroyer at (716) 626-0060.