

Information Pertaining to Form ADV Disclosure

Below, you will find a sample disclosure to assist your Firm in describing in its Form ADV Part 2 the general platform services that Community National Bank (CNB Custody) provides to advisors. It is the Firm's responsibility to ensure that the information in its Form ADV is accurate and complete, and the Firm must make its own assessment of the information that is necessary to include.

Although the disclosure does not need to follow the sample disclosure exactly and may provide more detailed information, the disclosure regarding general platform services should include each of the following points:

- The Firm utilizes Community National Bank (CNB Custody) for asset custody. CNB Custody is a national bank, regulated by the Office of the Comptroller of the Currency, and is an eligible IRA custodian under the IRS.
- CNB Custody and the Firm are separate and unaffiliated.
- CNB Custody offers services to independently registered investment advisors' clients, which includes custody of securities.
- The Firm may recommend CNB Custody to clients for custody services.
- Potential conflict of interest disclosure.
- That the Firm's receipt of general platform services does not diminish the Firm's duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.

It is the Firm's responsibility to ensure that complete and accurate disclosure is made to its clients and potential clients of all material facts. It is also the Firm's responsibility to ensure compliance with the requirements of the Investment Advisers Act of 1940 (as amended) and other applicable laws and regulations. We strongly recommend that you seek the advice of a legal/compliance professional to assist with this effort. CNB Custody does not undertake any responsibility or liability for the Firm's compliance with its disclosure or other regulatory and fiduciary obligations.

Sample Form ADV 2A Disclosure Relating to Receipt of General Platform Services

Part 2A Brochure, Item 12, Brokerage Practices.

Advisor utilizes Community National Bank (CNB Custody) for asset custody. CNB Custody is a national bank, regulated by the Office of the Comptroller of the Currency, and is an eligible IRA custodian under the IRS. CNB Custody is not a broker/dealer or clearing firm and does not provide a trading platform for publicly traded investments.

Part 2A Brochure, Item 14, Client Referrals and Other Compensation.

As disclosed under Item 12 above, Advisor utilizes CNB Custody for custody services and Advisor may recommend CNB Custody to clients for custody services. There is no direct link between Advisor's usage of CNB Custody and the investment advice it gives to its clients, although Advisor receives economic benefits through its utilization of CNB Custody that are typically not available to CNB Custody self-directed investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; the ability to have advisory fees deducted directly from client accounts; the ability to receive data feeds or direct data feeds to data aggregators; and access to an electronic portal for viewing account information. Some of the products and services made available by CNB Custody may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering client accounts. The benefits received by Advisor or its personnel through CNB Custody do not depend on the amount of assets held at CNB Custody. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of CNB Custody for custody services.

THIS SAMPLE DISCLOSURE IS MADE AVAILABLE FOR YOUR ASSISTANCE AND CONVENIENCE ONLY AND NOT AS A SUBSTITUTE FOR YOUR ADVICE OF ADVISOR'S LEGAL/COMPLIANCE PROFESSIONALS. CNB CUSTODY IS NOT ENGAGED IN RENDERING LEGAL OR COMPLIANCE SERVICES. THIS SAMPLE DISCLOSURE IS NOT INTENDED TO MEET THE SPECIFIC NEEDS OF PARTICULAR INVESTMENT ADVISORS. THIS SAMPLE DISCLOSURE SHOULD BE USED ONLY WITH THE ADVICE AND CONSULTATION OF ADVISOR'S LEGAL/COMPLIANCE PROFESSIONALS.