



Daybright Advisory Services, Inc.

Part 2B of Form ADV Brochure Supplement

July 2025

Daybright Advisory Services, Inc.
9350 Financial Centre
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Miami, FL 33156
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This brochure supplement provides information about the individuals listed within that supplements the Daybright Advisory Services brochure you should have received. If you did not receive the Daybright Advisory Services brochure, or have questions about the contents of this supplement, please contact Melanie Hancock Brown at 813-379-9549.

Additional information about the individual(s) listed in the table of contents is available on the SEC's website at adviserinfo.sec.gov/.

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Neeta Balani, Miami, FL

Item 2: Educational Background & Business Experience

Full Legal Name: Neeta Balani Born: 1978

Education

- Ness Wadia College of Commerce; Bachelor of Business Administration; 1998
- Symbiosis Institute of Management; Post Graduate Diploma in Public Relations; 1999
- University of Pune; Master of Business Administration; 2002

Business Experience

- Northern Trust (Assignment through Brickell Personnel); Investment Associate; from 2006 to 2007
- 1st Discount Brokerage, Inc.; Portfolio Analyst; from 2008 to 2010
- US Trust, Bank of America; Portfolio Manager Associate; from 2010 to 2011
- Sun Creek Holdings, LLC; Financial Advisor; from 2015 to 2019
- Ingham Retirement Group, Senior Analyst/ Investment Advisor Rep.; 2019 to Present

Designations

Neeta Balani has earned the following designation(s) and is in good standing with the granting authority:

- **Chartered Financial Analyst®; CFA Institute; 2009**
This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA® charter, candidates must successfully complete three exams and gain at least three (3) years of qualifying work experience, among other requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.
- **Certified Financial Planner; 2023**
This designation is awarded by the Certified Financial Planner (CFP) Board of Standards. To obtain the CFP designation, candidates must have a bachelor's degree, complete coursework in financial planning, have 6,000 hours of experience and pass a CFP exam. There are also ethics and continuing educational requirements.

Item 3: Disciplinary Information

Neeta Balani has no reportable disciplinary history.

Item 4: Other Business Activities

- **Investment-Related Activities**
 - Neeta Balani is not engaged in any other investment-related activities.
 - Neeta Balani does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- **Non-Investment-Related Activities**

Neeta Balani is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

Item 5: Additional Compensation

Neeta Balani does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Ms. Neeta Balani provides Investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Melissa Banaszak, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Emmanuelle Melissa Banaszak Born: 1985

Education

- University of Miami; BBA, International Finance & Marketing, English, Cum Laude; 2006

Business Experience

- Ingham Retirement Group; Investment Analyst; from 2007 to Present

Item 3: Disciplinary Information

Ms. Banaszak has no reportable disciplinary history.

Item 4: Other Business Activities

Ms. Banaszak, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest, nor does Ms. Banaszak earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Ms. Banaszak does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Ms. Banaszak provides Investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Stephen Coombs, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Stephen Curtis Coombs Born: 1971

Education

- University of Memphis, TN; B.S. in Business, Accounting; 1993
- Evangelical Christian School, Cordova, TN; 1989

Business Experience

- Ingham Retirement Group, Senior Pension Administrator Rep.; July 2019 to Present
- Brewster & Brewster, Inc.; Senior Administrator/Consultant; April 2017 to July 2019
- Plan Administration & Consulting, LLC; Director of Plan Administration; November 2015 to April 2017
- First Mercantile/Member of Massmutual; Director of Plan Administration; from June 1995 to Nov. 2015
- Morgan Keegan; Fixed Income Research Analyst; from January 1994 to June 1995

Designations

Stephen Coombs has earned the following designations and is in good standing with the granting authority:

- **QKA; ASPPA, Arlington, VA; 2006**
The QKA credential is the national standard for all professionals working with 401(k) retirement plans. Attaining the QKA credential illustrates commitment to the profession and competence in DC plan administration.
- **QPA; ASPPA, Arlington, VA; 2009**
The Qualified Pension Administrator (QPA) credential was created by ASPPA to recognize professionals who are qualified to perform the technical and administrative functions of qualified plan administration. QPAs assist employers, actuaries, and consultants in performing functions such as determination of eligibility benefits, computation of benefits, plan recordkeeping, trust accounting and disclosure, and compliance requirements.
- **CPC; ASPPA, Arlington, VA; 2017**
The Certified Pension Consultant (CPC) credential is conferred by ASPPA to benefits professionals working in plan administration, pension actuarial administration, insurance and financial planning. CPCs work alongside employers to formulate, implement, administer and maintain qualified retirement plans. The CPC is the capstone credential, or highest credential, currently conferred by ASPPA.
- **AIF; Center for Fiduciary Studies, University of Pittsburgh; 2021**
This designation is offered by the Center for Fiduciary Studies. To obtain the AIF Designation, candidates must successfully complete one difficult exam and a two-day intensive classroom program. In passing this exam, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.
- **QKC; Qualified 401(k) Consultant; 2021**
The Qualified 401(k) Consultant (QKC) involves passing DC3 Advanced topics including: Plans Covering More Than One Employer and Leased Employees and Other Employer Situations, Controlled Groups and Affiliated Service Groups, Compensation, Average Benefit Test and Special Rules,

Nondiscrimination, Employee Stock Ownership Plans, Fiduciary Standards, Prohibited Transactions, Distributions Upon Death and Life Insurance, and the Code of Professional Conduct.

Item 3: Disciplinary Information

Mr. Coombs has no reportable disciplinary history.

Item 4: Other Business Activities

Mr. Coombs, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Mr. Coombs earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Mr. Coombs does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Mr. Coombs provides Investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Marc J. Eichberg, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Marc J. Eichberg

Born: 1957

Education

- University of Miami; BBA, Accounting; 1979

Business Experience

- Ingham Retirement Group; Principal & Pension Consultant; from 1991 to Present

Designation

Marc J. Eichberg has earned the following designation(s) and is in good standing with the granting authority (although currently inactive):

- **CPA; Florida Institute of Certified Public Accountants; 1981**
This designation is offered by the Florida Division of Certified Public Accounting. To obtain the CPA designation candidates must pass all four parts of the CPA Examination and have one year work experience under the supervision of a licensed CPA. Candidates must complete 150 credit hours with at least 36 hours in several core accounting areas.
- **CPA; American Institute of Certified Public Accountants; 1982**

Item 3: Disciplinary Information

Mr. Eichberg has no reportable disciplinary history.

Item 4: Other Business Activities

Certain investment products may pay commissions to registered representatives. While receiving commissions might provide an incentive to recommend products based on the compensation received, rather than on the client's needs, Ingham Retirement Group avoids any conflict by reducing or offsetting asset-based fees charged to the Client. Mr. Eichberg, as a shareholder in Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Eichberg sometimes earns additional compensation from Ingham Retirement Group in connection with providing these services to Clients.

Item 5: Additional Compensation

Mr. Eichberg does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Patrick Hale

Title: President

Phone Number: (305) 671-2200

Patrick Hale designates the Chief Compliance Office and the investment committee to regularly review the accounts for which Mr. Eichberg provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Hale directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Ronald J. Fishman

Item 2: Educational Background and Business Experience

Full Legal Name: Ronald J. Fishman Born: 1963

Education

- Boston University, 1981-1985

Business Experience

- PASI Investments, LLC, Advisor, Dec. 2007 to present
- PASI, LLC, Member, Dec. 2007 to present
- YHB Retirement Services, LLC, Officer and Stockholder, March 1998 to Nov. 2007
- Pension Consultants, Inc., Partner and Consultant, January 1994 to March 1998
- Federal Reserve Bank, Analyst, June 1988 to January 1994
- Fidelity Investments, Institutional Sales, October 1985 to June 1988

Item 3: Disciplinary Information

Ronald J. Fishman has no reportable disciplinary history.

Item 4: Other Business Activities

- Ronald J. Fishman is not engaged in any other investment-related activities.
- Ronald J. Fishman is co-owner of PASI, LLC, a third-party administration company that advises business owners and plan sponsors in the selection, design, implementation and administration of their retirement plans. Mr. Fishman may refer clients in need of third-party administrative services to PASI, LLC. Conflict of Interest: The recommendation by Mr. Fishman that a client engage the services of PASI, LLC presents a conflict of interest, as the receipt of compensation may provide an incentive to recommend the services of PASI, LLC based on compensation to be received, rather than on a particular client's need. No client is under any obligation to engage the services of PASI, LLC. The Registrant's Chief Compliance Officer, Melanie Hancock Brown, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Item 5: Additional Compensation

Ronald J. Fishman does not receive any additional compensation.

Item 6: Supervision

PASI provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of PASI's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). PASI's Chief Compliance Officer, Melanie Hancock Brown, is primarily responsible for the implementation of its policies and procedures and overseeing the activities of its supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of PASI 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 PASI's supervision or compliance practices, please contact Ms. Hancock Brown at 860-284-6880.

Laura E. Gutierrez-Mendez, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Laura E. Gutierrez-Mendez Born: 1992

Education

- California State University; Northridge, Bachelor of Finance Option in Financial Planning, 2014

Business Experience

- Ingham Retirement Group; Certified Financial Planner; March 2022 to Present
- Empress Investment Group, Associate Advisor - June 2018 - March 2022
- LPL Financial, Registered Representative - October 2014 - June 2018
- New England Securities, Registered Administrative Associate October 2012 - September 2014

Item 3: Disciplinary Information

Ms. Gutierrez-Mendez has no reportable disciplinary history.

Item 4: Other Business Activities

- **Investment-Related Activities**
 - Ms. Gutierrez-Mendez is not engaged in any other investment-related activities.
 - Ms. Gutierrez-Mendez does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- **Non-Investment-Related Activities**

Ms. Gutierrez-Mendez is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5: Additional Compensation

Ms. Gutierrez-Mendez does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA and Chief Investment Officer

Phone Number: 305-671-2200

Todd J. Levy regularly reviews the accounts for which Laura Gutierrez-Mendez provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and individual client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee managers are held on a continuous ongoing basis.

Derek J. Ivey

Item 2: Educational Background and Business Experience

Full Legal Name: Derek J. Ivey Born: 1999

Education

- Stonehill College, 2021, Bachelor of Arts, Economics.

Business Experience

- PASI Investments, LLC, Analyst, Nov. 2022 to present
- Harvard University, Teaching Assistant, June 2021 to Aug. 2022
- Wells Fargo Bank, Teller, Sep. 2021 to Feb. 2022
- Best Buy, Sales Associate, July 2021 to Jan. 2022

Item 3: Disciplinary Information:

Derek J. Ivey has no reportable disciplinary history.

Item 4: Other Business Activities

- Derek J. Ivey is not engaged in any other investment-related activities.
- Derek J. Ivey is not engaged in any other non-investment-related business or occupation for compensation.

Item 5: Additional Compensation

Derek J. Ivey does not receive any additional compensation.

Item 6: Supervision

PASI provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of PASI's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). PASI's Chief Compliance Officer, Melanie Hancock Brown, is primarily responsible for the implementation of its policies and procedures and overseeing the activities of its supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of PASI 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 PASI's supervision or compliance practices, please contact Ms. Hancock Brown at 860-284-6880.

Todd J. Levy, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Todd J. Levy Born: 1974

Education

- Syracuse University; B.A. Finance, Finance; 1996

Business Experience

- Ingham Retirement Group; Investment Consultant; from 2005 to Present

Designations

Todd J. Levy has earned the following designations and is in good standing with the granting authority:

- AIFA; Center for Fiduciary Studies, University of Pittsburgh; 2007
This designation is offered by the Center for Fiduciary Studies. To obtain the AIFA Designation, candidates must successfully attain the AIF designation which consists of one exam and a three-day intensive classroom program, complete a case study and pass an additional exam. In passing these exams, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.
- QKA; American Society of Pension Actuaries; 2007
Earning ASPPA's QKA credential requires successful completion of the following exams: Retirement Plan Fundamentals Part 1 (RPF-1), Retirement Plan Fundamentals Part 2 (RPF-2), Defined Contribution Administrative Issues – Basic Concepts (DC-1) and Defined Contribution Administrative Issues – Compliance Issues (DC-2). A minimum of two years' experience in retirement plan related matters is required along with completion of ASPPA's QKA examination series to be a candidate for this credential.

Item 3: Disciplinary Information

Mr. Levy has no reportable disciplinary history.

Item 4: Other Business Activities

Mr. Levy, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. Mr. Levy sometimes earns additional compensation from Ingham Retirement Group in connection with providing these services to clients.

Item 5: Additional Compensation

Mr. Levy does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Patrick Hale

Title: President

Phone Number: (305) 671-2200

Patrick Hale designates the Chief Compliance Office and the investment committee to regularly review the accounts for which Mr. Levy provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Hale directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Todd J. Levy reports to the Board of Directors and is responsible for the supervision of all employees of Ingham Retirement Group.

Heidi Lee Miller, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Heidi Lee Miller Born: 1967

Education

- University of New Mexico; Bachelors, Arts and Science and Finance Concentration; 1990

Business Experience

- Ingham Retirement Group; Consultant; from 2007 to Present
- Ingham Retirement Group; Manager; from 1997 to 2007

Designations

Heidi Lee Miller has earned the following designations and is in good standing with the granting authority:

- **AIF; Center for Fiduciary Studies, University of Pittsburgh; 2005**
This designation is offered by the Center for Fiduciary Studies. To obtain the AIF Designation, candidates must successfully complete one difficult exam and a two day intensive classroom program. In passing this exam, candidates must demonstrate their competence, integrity and extensive knowledge of the best practices for managing the fiduciary investment process.
- **QKA; American Society of Pension Actuaries; 2007**
Earning ASPPA's QKA credential requires successful completion of the following exams: Retirement Plan Fundamentals Part 1 (RPF-1), Retirement Plan Fundamentals Part 2 (RPF-2), Defined Contribution Administrative Issues – Basic Concepts (DC-1) and Defined Contribution Administrative Issues – Compliance Issues (DC-2). A minimum of two years experience in retirement plan related matters is required along with completion of ASPPA's QKA examination series to be a candidate for this credential.
- **QKC; Qualified 401(k) Consultant; 2020**
The Qualified 401(k) Consultant (QKC) involves passing DC3 Advanced topics including: Plans Covering More Than One Employer and Leased Employees and Other Employer Situations, Controlled Groups and Affiliated Service Groups, Compensation, Average Benefit Test and Special Rules, Nondiscrimination, Employee Stock Ownership Plans, Fiduciary Standards, Prohibited Transactions, Distributions Upon Death and Life Insurance, and the Code of Professional Conduct.

The QKC credential program teaches advanced defined contribution testing and plan design techniques. The curriculum complements QKA plan administration knowledge and prepares retirement plan professionals to serve in a consultative capacity.

The QKC program focuses on complex 401(k) topics, training seasoned staff to administer advanced plans. It covers the skills you'll need to amplify client satisfaction (including the plan sponsors and financial advisors you'll deal with), identify new revenue streams, enhance operational efficiency and serve confidently in a consultative capacity.

Item 3: Disciplinary Information

Ms. Miller has no reportable disciplinary history.

Item 4: Other Business Activities

Ms. Miller, as an employee of Ingham Retirement Group, also provides pension consulting services, pension administration and record keeping services to retirement plans and plan sponsors. There are no conflicts of interest nor does Ms. Miller earn any additional compensation from these clients for providing these services.

Item 5: Additional Compensation

Ms. Miller does not receive any economic benefit from a non-advisory client for the providing of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA, Chief Investment Officer

Phone Number: (305) 671-2200

Todd J. Levy and other individuals as designated regularly review the accounts for which Ms. Miller provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and high net worth client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee meetings are held quarterly and ongoing capital markets meetings and conference calls with asset managers are held on a continuous and ongoing basis.

Jeffrey M. Pangaro

Item 2: Educational Background and Business Experience

Full Legal Name: Jeffrey M. Pangaro

Born: 1979

Education

- Sacred Heart University, 2004, Bachelor of Science, Business and Finance

Business Experience

- PASI Investments, LLC, Advisor, Aug. 2021 to present
- Pangaro Wealth Management, LLC, Advisor, Oct. 2014 to August 2023

Item 3: Disciplinary Information

Jeffrey M. Pangaro has no reportable disciplinary history.

Item 4: Other Business Activities

- Jeffrey M. Pangaro is not engaged in any other investment-related activities.
- Jeffrey M. Pangaro, 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. Pangaro to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Pangaro 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. Pangaro. Clients are reminded that they may purchase insurance products recommended by Mr. Pangaro through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Melanie Hancock Brown, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Item 5: Additional Compensation

Jeffrey M. Pangaro's annual compensation is based, in part, on the number of clients that Mr. Pangaro introduces to PASI. Accordingly, Mr. Pangaro has a conflict of interest for recommending PASI to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6: Supervision

PASI provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of PASI's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). PASI's Chief Compliance Officer, Melanie Hancock Brown, is primarily responsible for the implementation of its policies and procedures and overseeing the activities of its supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of PASI 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 PASI's supervision or compliance practices, please contact Ms. Hancock Brown at 860-284-6880.

Jeffrey Poling

Item 2: Educational Background and Business Experience

Full Legal Name: Jeffrey Poling Born: 1984

Education

- Cumberland University, Bachelor of Business Administration, 2008

Business Experience

- TRPC Advisory Services, Inc.; Registered Investment Advisor & Chief Compliance Officer; January 2017 to Present
- ProEquities, Inc., Broker-Dealer; April 2011 to January 2017

Item 3: Disciplinary Information

Jeffrey Poling has no reportable disciplinary history.

Item 4: Other Business Activities

Mr. Poling has offered life insurance products with First Protective. This relationship may account for a substantial amount of his income. As such, he may receive compensation for the sale of insurance products. Clients are under no obligation to utilize the services of First Protective or Mr. Poling for their insurance needs or purchase insurance products recommended by Mr. Poling or by any associated persons. Also Mr. Poling completed the AIF (Accredited Investment Fiduciary) in August of 2021, and holds the CPFA, CAM and RFP credentials.

Item 5: Additional Compensation

As an insurance agent, Mr. Poling may be entitled to additional compensation such as awards or bonuses based on commission sales. As such, TRPC Advisory Services, Inc. discloses this conflict of interest to our clients. Clients are under no obligation to purchase life insurance products from Mr. Poling.

Item 6: Supervision

Supervisor: Patrick Hale

Title: President

Phone Number: 615-515-4427

Mr. Hale supervises the activities of Mr. Poling. Mr. Hale is the supervisor for all employees of TRPC Advisory Services, Inc. Mr. Hale does not render advice directly to clients and monitors the advice provided by Mr. Poling.

Ashley W. Rendon

Item 2: Educational Background and Business Experience

Full Legal Name: Ashley W. Rendon Born: 1984

Education:

- University of Texas at Arlington, 2009, Bachelor of Arts, Criminology

Business Experience

- PASI Investments, LLC, Advisor, Mar. 2022 to present
- Edward Jones, Financial Advisor, Aug. 2017 to Feb. 2022

Designations

- **Accredited Asset Management SpecialistSM (AAMS[®]), 2020**
The AAMS[®] is awarded by the College for Financial Planning[®] to investment professionals who complete its 12-module AAMS[®] Professional Education Program, pass an examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the AAMS[®] designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the AAMS[®] designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Item 3: Disciplinary Information:

Ashley W. Rendon has no reportable disciplinary history.

Item 4: Other Business Activities

- Ashley W. Rendon is not engaged in any other investment-related activities.
- Ashley W. Rendon is not engaged in any other non-investment-related business or occupation for compensation.

Item 5: Additional Compensation

Ashley W. Rendon's annual compensation is based, in part, on the number of clients that Ms. Rendon introduces to PASI. Accordingly, Ms. Rendon has a conflict of interest for recommending PASI to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Item 6: Supervision

PASI provides investment advisory and supervisory services in accordance with its policies and procedures manual. The primary purpose of PASI's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). PASI's Chief Compliance Officer, Melanie Hancock Brown, is primarily responsible for the implementation of its policies and procedures and overseeing the activities of its supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of PASI 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 PASI's supervision or compliance practices, please contact Ms. Hancock Brown at 860-284-6880.

Marlon Suarez, Miami, FL

Item 2: Educational Background and Business Experience

Full Legal Name: Marlon Suarez Born: 1993

Education

- Florida International University; Bachelor of Business Administration; 2020

Business Experience

- Ingham Retirement Group; Client Service Administrator; January 2020 to Present
- Green Mountain Corp., Sales Associate, January 2013 to January 2020.

Item 3: Disciplinary Information

Mr. Suarez has no reportable disciplinary history.

Item 4: Other Business Activities

- **Investment-Related Activities**
 - Mr. Suarez is not engaged in any other investment-related activities.
 - Mr. Suarez does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- **Non-Investment-Related Activities**

Mr. Suarez is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5: Additional Compensation

Mr. Suarez does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6: Supervision

Supervisor: Todd J. Levy

Title: AIFA, QKA and Chief Investment Officer

Phone Number: 305-671-2200

Todd J. Levy regularly reviews the accounts for which Marlon Suarez provides investment advisory services to monitor suitability of recommendations and compliance with regulatory and internal procedures. In addition, Mr. Levy directs the internal investment committee to review qualified plan and individual client holdings relative to Investment Policy Statement (IPS) criteria to determine watch list or replacement fund recommendations. Formal investment committee managers are held on a continuous ongoing basis.