

Disclosure Contents

Form CRS - Client Relationship Summary	2
Form ADV Part 2A – Disclosure Brochure	4
Form ADV Part 2B – Brochure Supplement	. 22
Privacy Policy	. 37

A Registered Investment Advisor

Item 1 – Introduction

Morton Brown Family Wealth, LLC ("we", "us" or "our") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Investment advisory services and compensation structures differ from that of a registered broker-dealer, and it is important that you understand the differences.

Free and simple tools are available to research firms and financial professionals at <u>www.Investor.gov/CRS</u>. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary and non-discretionary investment management and financial planning services to individuals, trusts and estates (our "retail investors").

When a retail investor engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our authority over your account(s) shall continue until our engagement is terminated.

We offer investment management and financial planning services as part of our standard investment advisory engagement. However, we may be engaged to provide financial planning services on a separate fee basis. When we provide financial planning services, we rely upon the information provided by the client for our financial analysis and do not verify any such information while providing this service.

We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment.

<u>Additional Information</u>: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our <u>ADV Part 2A</u>.

Conversation Starters:

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

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

What Fees will I pay?

We provide our investment advisory services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our "AUM Fee"). Our annual AUM Fee is negotiable but does not generally exceed 1.50%. We do not require a minimum asset level or impose a minimum fee for investment management services.

We typically deduct our AUM Fee from one or more of your accounts, in advance, on a monthly basis. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

We offer our Financial Planning services on a fixed fee basis, generally between \$2,500 and \$15,000. The fee for any subsequent work shall be agreed to prior to commencing the engagement.

<u>Other Fees and Costs</u>: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions. In addition, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g., management

A copy of our Part 2A is available at: Form ADV Part 2A

fees and other fund expenses).

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

<u>Additional Information</u>: For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our <u>ADV Part 2A</u>.

Conversation Starter:

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

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

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. As an example, we may recommend a particular custodian to custody your assets, and we may receive support services and/or products from that same custodian, certain of which assist us to better monitor and service your account while a portion may be for the benefit of our firm.

Conversation Starter:

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

<u>Additional Information</u>: For more detailed information about our conflicts of interest, please review our <u>ADV Part</u> <u>2A</u>.

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis. However, certain of our financial professionals, based upon their individual professional ability, may receive a performance bonus from time-to-time. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. We encourage you to visit <u>www.Investor.gov/CRS</u> to research our firm and our financial professionals.

Furthermore, we encourage you to ask your financial professional: As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. You may contact our Chief Compliance Officer at any time to request a current copy of your <u>ADV Part 2A</u> or our *relationship summary*. Our Chief Compliance Officer Kathryn Brown may be reached by phone: (610)709-5072.

Conversation Starters:

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

A copy of our Part 2A is available at: Form ADV Part 2A

MORTON BROWN FAMILY WEALTH, LLC

ADV Part 2A - Disclosure Brochure Dated: March 20, 2024

Contact: Kathryn M. Brown, Chief Compliance Officer 600 West Hamilton Street, Suite 300 Allentown, Pennsylvania, 18101

www.mortonbrownfw.com

CRD # 292278

This brochure provides information about the qualifications and business practices of Morton Brown Family Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (610)709-5072 or at kbrown@mortonbrownfw.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Morton Brown Family Wealth, LLC also is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

References herein to Morton Brown Family Wealth, LLC as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

There have been no material changes made to our Disclosure Brochure since our last annual amendment filing made on March 15, 2023.

Item 3 Table of Contents

Item 2	Material Changes	2
Item 3	Table of Contents	2
Item 4	Advisory Business	
Item 5	Fees and Compensation	8
Item 6	Performance-Based Fees and Side-by-Side Management	
Item 7	Types of Clients	10
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	10
Item 9	Disciplinary Information	12
Item 10	Other Financial Industry Activities and Affiliations	12
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	
Item 12	Brokerage Practices	14
Item 13	Review of Accounts	
Item 14	Client Referrals and Other Compensation	16
Item 15	Custody	16
Item 16	Investment Discretion	
Item 17	Voting Client Securities	17
Item 18	Financial Information	

Item 4 Advisory Business

A. Morton Brown Family Wealth, LLC (the "Registrant") is a limited liability company formed in the state of Delaware in January 2018. The Registrant became registered as a registered investment advisor with the U.S. Securities and Exchange Commission in February 2018. The Registrant is principally owned by Kathryn M. Brown and Dennis Morton, Jr. Ms. Brown and Mr. Morton are the Registrant's Co-Managing Members.

В.

INVESTMENT ADVISORY SERVICES

The Registrant provides discretionary and non-discretionary investment advisory services on a *fee* basis. Registrant's annual investment advisory fee shall include investment advisory services, and, to the <u>extent specifically requested</u> by the client, financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Registrant), the Registrant may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

The Registrant provides investment advisory services specific to the needs of each client. Before providing investment advisory services, an investment adviser representative will ascertain each client's investment objectives. Thereafter, the Registrant will recommend that the client allocate investment assets consistent with the designated investment objectives. The Registrant primarily recommends that clients allocate investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds ("ETFs") in accordance with the client's designated investment objective(s). Once allocated, the Registrant provides ongoing monitoring and review of account performance, asset allocation and client investment objectives.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

The Registrant may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. The Registrant offers financial planning on a project and ongoing basis.

Prior to engaging the Registrant to provide planning or consulting services, clients are generally required to enter into a consulting agreement with Registrant setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes, including certain of the Registrant's representatives in their individual capacities as licensed insurance agents (See disclosure at Item 10.C below). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional(s) (i.e., attorney, accountant, insurance agent, etc.), and <u>not</u> the Registrant, shall be responsible for the quality and competency of the services provided.

It remains the client's responsibility to promptly notify the Registrant if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Registrant's previous recommendations and/or services.

Miscellaneous

Limitations of Financial Planning and Non-Investment Consulting/Implementation <u>Services</u>. As indicated above, to the extent requested by a client, Registrant will generally provide financial planning and related consulting services inclusive of its advisory fee as set forth at Item 5 below (exceptions may occur based upon assets under management, special projects, etc. for which the Registrant may charge a separate fee). However, neither the Registrant nor its investment adviser representatives assist clients with the implementation of any financial plan, unless they have agreed to do so in writing. The Registrant does not monitor a client's financial plan, and it is the client's responsibility to revisit the financial plan with the Registrant, if desired.

Furthermore, although the Registrant may provide recommendations regarding noninvestment related matters, such as estate planning, tax planning and insurance, the Registrant <u>does not</u> serve as an attorney or accountant, and no portion of its services should be construed as legal or accounting services. Accordingly, the Registrant <u>does not</u> prepare estate planning documents or tax returns.

To the extent requested by a client, the Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, insurance, etc.), including certain of the Registrant's representatives in their individual capacities as licensed insurance agents (See disclosure at Item 10.C below). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Registrant and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional(s) (i.e., attorney, accountant, insurance agent, etc.), and <u>not</u> the Registrant, shall be responsible for the quality and competency of the services provided.

<u>Non-Discretionary Service Limitations</u>. Clients that determine to engage the Registrant on a non-discretionary investment advisory basis <u>must be willing to accept</u> that the Registrant cannot effect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, the Registrant will be unable to effect any account transactions (as it would for its discretionary clients) without first obtaining the client's consent.

Independent Managers. Registrant may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers ("Independent Manager(s)") in accordance with the client's designated investment objective(s). In such situations, the Independent Manager(s) will

have day-to- day responsibility for the active discretionary management of the allocated assets. Registrant will continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives.

The Registrant generally considers the following factors when recommending Independent Manager(s): the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by the designated Independent Manager(s) are exclusive of, and in addition to, Registrant's ongoing investment advisory fee, which will be disclosed to the client before entering into the Independent Manager engagement and/or subject to the terms and conditions of a separate agreement between the client and the Independent Manager(s).

Use of Mutual and Exchange Traded Funds: Most mutual funds and exchange traded funds are available directly to the public. Therefore, a prospective client can obtain many of the funds that may be utilized by Registrant independent of engaging Registrant as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Registrant's initial and ongoing investment advisory services.

In addition to Registrant's investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

eMoney Advisor Platform. Registrant may provide its clients with access to an online platform hosted by "eMoney Advisor" ("eMoney"). The eMoney platform allows a client to view their complete asset allocation, including those assets that Registrant does not manage (the "Excluded Assets"). Registrant does not provide investment management, monitoring, or implementation services for the Excluded Assets. Unless otherwise specifically agreed to, in writing, Registrant's service relative to the Excluded Assets is limited to reporting only. Therefore, Registrant shall not be responsible for the investment performance of the Excluded Assets. <u>Rather, the client and/or their advisor(s) that maintain management authority for the Excluded Assets, and not Registrant, shall be exclusively responsible for such investment performance.</u>

Without limiting the above, the Registrant shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client may choose to engage Registrant to manage some or all of the Excluded Assets pursuant to the terms and conditions of an advisory agreement between Registrant and the client.

The eMoney platform also provides access to other types of information and applications including financial planning concepts and functionality, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by Registrant. Finally, Registrant shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without Registrant's assistance or oversight.

<u>Portfolio Activity</u>. Registrant has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Registrant will review client portfolios on an ongoing basis to determine if any changes are necessary based

upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Registrant determines that changes to a client's portfolio are neither necessary nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

Socially Responsible (ESG) Investing Limitations. Socially Responsible Investing involves the incorporation of Environmental, Social and Governance ("ESG") considerations into the investment due diligence process. ESG investing incorporates a set of criteria/factors used in evaluating potential investments: Environmental (i.e., considers how a company safeguards the environment); Social (i.e., the manner in which a company manages relationships with its employees, customers, and the communities in which it operates); and Governance (i.e., company management considerations). The number of companies that meet an acceptable ESG mandate can be limited when compared to those that do not and could underperform broad market indices. Investors underperformance. limitations, including must accept these potential for Correspondingly, the number of ESG mutual funds and exchange-traded funds are limited when compared to those that do not maintain such a mandate. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by Registrant), there can be no assurance that investment in ESG securities or funds will be profitable or prove successful. Registrant does not maintain or advocate an ESG investment strategy but will seek to employ ESG if directed by a client to do so. If implemented, Registrant shall rely upon the assessments undertaken by the unaffiliated mutual fund, exchange traded fund or separate account portfolio manager to determine that the fund's or portfolio's underlying company securities meet a socially responsible mandate.

<u>Cash Positions.</u> Registrant continues to treat cash as an asset class. As such, unless determined to the contrary by Registrant, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating Registrant's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Registrant may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, Registrant's advisory fee could exceed the interest paid by the client's money market fund.

<u>Cash Sweep Accounts</u>. Certain account custodians can require that cash proceeds from account transactions or new deposits, be swept to and/or initially maintained in a specific custodian designated sweep account. The yield on the sweep account will generally be lower than those available for other money market accounts. When this occurs, to help mitigate the corresponding yield dispersion Registrant shall (usually within 30 days thereafter) generally (with exceptions) purchase a higher yielding money market fund (or other type security) available on the custodian's platform, unless Registrant reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to the amount of dispersion between the sweep account and a money market fund, the size of the cash balance, an

indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account.

The above does not apply to the cash component maintained within a Registrant actively managed investment strategy (the cash balances for which shall generally remain in the custodian designated cash sweep account), an indication from the client of a need for access to such cash, assets allocated to an unaffiliated investment manager and cash balances maintained for fee billing purposes.

The client shall remain exclusively responsible for yield dispersion/cash balance decisions and corresponding transactions for cash balances maintained in any Registrant unmanaged accounts.

Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Registrant recommends that a client roll over their retirement plan assets into an account to be managed by Registrant, such a recommendation creates a <u>conflict of interest</u> if Registrant will earn new (or increase its current) compensation as a result of the rollover. If Registrant provides a recommendation as to whether a client should engage in a rollover or not, Registrant is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. <u>No client is under any obligation to roll over retirement plan assets to an account managed by Registrant</u>.

<u>Client Obligations</u>. In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify the Registrant if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Registrant's previous recommendations and/or services.

Cybersecurity Risk. The information technology systems and networks that Registrant and its third-party service providers use to provide services to Registrant's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in Registrant's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and Registrant are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although Registrant has established procedures to reduce the risk of cybersecurity incidents, there is no guarantee that these efforts will always be successful, especially considering that Registrant does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

Disclosure Statement. A copy of the Registrant's written Brochure and Client Relationship Summary, as set forth on Part 2 of Form ADV and Form CRS respectively, shall be provided to each client prior to the execution of any advisory agreement.

- C. The Registrant shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, the Registrant shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on the Registrant's services.
- D. The Registrant does not participate in a wrap fee program.
- E. As of December 31, 2023, the Registrant had \$317,902,225 in assets under management on a discretionary basis.

Item 5 Fees and Compensation

A.

INVESTMENT ADVISORY SERVICES

The Registrant provides discretionary investment advisory services on a *fee* basis. The Registrant's annual investment advisory fee is based upon a percentage (%) of the market value of the client's assets placed under the Registrant's management. The Registrant's fee shall generally be between 0.50% and 1.50% of the client's assets under management.

The Registrant's investment advisory fee is negotiable at Registrant's discretion, depending upon objective and subjective factors including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with the Registrant and/or its representatives, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by the Registrant to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

The Registrant provides financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. The Registrant may be engaged on either a project or ongoing basis.

Registrant's planning and consulting fees are negotiable, but generally range from \$2,500 up to \$15,000, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s), when engaged on a project basis. When engaged

on an ongoing basis, the Registrant shall charge a flat annual fee which shall be paid monthly in advance.

- B. Clients may elect to have the Registrant's advisory fees deducted from their custodial account. Both Registrant's Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that advisory fee to the Registrant in compliance with regulatory procedures. In the limited event that the Registrant bills the client directly, payment is due upon receipt of the Registrant's invoice. The Registrant shall deduct fees and/or bill clients monthly in advance, based upon the market value of the assets on the last business day of the previous month.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Registrant shall generally recommend that Charles Schwab & Co. Inc. ("*Schwab*") serve as the broker-dealer/custodian for client investment management assets.

Broker-dealers such as *Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian. While certain custodians, including *Schwab*, generally (with the potential exception for large orders) do not currently charge fees on individual equity transactions (including ETFs), others do.

There can be no assurance that *Schwab* will not change their transaction fee pricing in the future.

Schwab may also assess fees to clients who elect to receive trade confirmations and account statements by regular mail rather than electronically.

Clients will incur, in addition to Registrant's investment management fee, brokerage commissions and/or transaction fees, and, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses). Clients engaging *Independent Managers* will incur additional investment advisory fees.

D. Registrant's annual investment advisory fee shall be prorated and paid monthly, in advance, based upon the market value of the assets on the last business day of the previous month. The Registrant shall make prorated fee adjustments for additions or withdrawals in excess of \$25,000 during the billing period. Adjustments will be carried over to the next billing period and will be either added or subtracted from the next billing period's fee.

With the exception of a financial planning engagement on a project basis, which may also automatically terminate upon the completion of the project, agreements between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Agreement. Upon termination, the Registrant shall refund the pro-rated portion of any advanced advisory fee paid to the Registrant based upon the number of days remaining in the billing month. E. Neither the Registrant, nor its representatives accept compensation from the sale of securities or other investment products.

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

Neither the Registrant nor any supervised person of the Registrant accepts performancebased fees.

Item 7 Types of Clients

The Registrant's clients shall generally include individuals, business entities, and trusts, estates.

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

A. The Registrant may utilize the following methods of security analysis:

• <u>Fundamental</u> - (analysis performed on historical and present data, with the goal of making financial forecasts)

The Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- <u>Short Term Purchases</u> (securities sold within a year)

Investment Risk. Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).

Investors generally face the following types investment risks:

- <u>Interest-rate Risk</u>: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- <u>Market Risk</u>: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors independent of the fund's specific investments as well as due to the fund's specific investments. Additionally, each security's price will fluctuate based on market movement and emotion, which may, or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.

- <u>Inflation Risk</u>: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- <u>Reinvestment Risk</u>: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- <u>Liquidity Risk</u>: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- <u>Financial Risk</u>: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- B. The Registrant's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

C. Currently, the Registrant primarily recommends that clients allocate investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds ("ETFs") on a discretionary and/or non-discretionary basis in accordance with the client's designated investment objective(s).

Transactions involve the risk of loss of capital and contain transaction costs associated with conducting trades and the settlement process as well as potential tax consequences. It is not the intent of the investment strategy or process to result in frequent trading of securities, however more frequent or shorter-term holding periods may occur if market conditions change quickly, or valuations are altered unexpectedly. A client's investment portfolio will fluctuate in value as market conditions change and the client could lose all or a portion of the value of the investment portfolio over short or long periods of time.

Borrowing Against Assets/Risks. A client who has a need to borrow money could determine to do so by using:

- <u>Margin</u>-The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral; and,
- <u>Pledged Assets Loan</u>- In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e., custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, Registrant does not recommend such borrowing unless it is for specific short-term purposes (i.e., a bridge loan to purchase a new residence). Registrant does not recommend such borrowing for investment purposes (i.e., to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to Registrant:

- by taking the loan rather than liquidating assets in the client's account, Registrant continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by Registrant, Registrant will receive an advisory fee on the invested amount; and,
- if Registrant's advisory fee is based upon the higher margined account value, Registrant will earn a correspondingly higher advisory fee. This could provide Registrant with a disincentive to encourage the client to discontinue the use of margin.

The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loan.

Item 9 Disciplinary Information

The Registrant has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C. <u>Licensed Insurance Agency/Agents</u>. The Registrant is separately licensed as an insurance agency. Furthermore, certain of the Registrant's representatives, in their individual capacities, are licensed insurance agents. The Registrant and/or its representatives may recommend the purchase of certain insurance-related products on a commission basis. As referenced in Item 4.B above, clients can engage certain of Registrant's representatives to purchase insurance products on a commission basis.

<u>**Conflict of Interest**</u>: The recommendation by representatives of the Registrant 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 to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from representatives of the Registrant or through the Registrant in its capacity as a licensed insurance agency. Clients are reminded that they may purchase insurance products recommended by Registrant through other, non-affiliated insurance agencies and/or agents.

D. The Registrant does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

A. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

- B. Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.
- C. The Registrant and/or representatives of the Registrant *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that an Access

Person of the Registrant must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Registrant selects; provided, however that at any time that the Registrant has only one Access Person, he or she shall not be required to submit any securities report described above.

D. The Registrant and/or representatives of the Registrant *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities of each of Registrant's Access Persons.

Item 12 Brokerage Practices

A. In the event that the client requests that Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at *Schwab*. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal advisory agreement with the Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Registrant considers in recommending Schwab (or any other brokerdealer/custodian to clients) include historical relationship with Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with Registrant's duty to seek best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Registrant determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Registrant's investment management fee. Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. <u>Research and Additional Benefits</u>

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant receives from *Schwab* (or another broker-dealer/custodian, investment platform, unaffiliated

investment manager, vendor, unaffiliated product/fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Registrant may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products received may assist Registrant in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Registrant to manage and further develop its business enterprise.

There is no corresponding commitment made by Registrant to *Schwab* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

- 2. Registrant does not receive referrals from broker-dealers.
- 3. Registrant does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Registrant will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Registrant. Higher transaction costs adversely impact account performance.

Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

B. To the extent that the Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless the Registrant decides to purchase or sell the same securities for several clients at approximately the same time. The Registrant may (but is not obligated to) combine or "bunch" such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among the Registrant's clients differences in prices and

commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

- A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an ongoing basis by the Registrant's Co-Managing Members and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Registrant on an annual basis.
- B. The Registrant may conduct account reviews on an other-than-periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Registrant may also provide a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12.A.1 above, the Registrant receives an economic benefit from broker-dealers. The Registrant, without cost (and/or at a discount), receives support services and/or products from broker-dealers.

There is no corresponding commitment made by the Registrant to a broker-dealer or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

The Registrant's Chief Compliance Officer, Kathryn Brown, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.

B. Registrant does not compensate any person, other than its representatives, for referrals.

Item 15 Custody

The Registrant shall have the ability to have its advisory fee for each client debited by the custodian on a monthly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The

Registrant may also provide a written periodic report summarizing account activity and performance.

To the extent that the Registrant provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Registrant with the account statements received from the account custodian.

The account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

In addition, certain clients may establish asset transfer authorizations that permit the qualified custodian to rely upon instructions from Registrant to transfer client funds or securities to third parties. To the extent established, these arrangements are disclosed at Item 9 of Part 1 of Form ADV. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association* No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination

Item 16 Investment Discretion

The client can determine to engage the Registrant to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming the Registrant as the client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Registrant on a discretionary basis may, at any time, impose restrictions, <u>in writing</u>, on the Registrant's discretionary authority (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Registrant's use of margin, etc.).

Item 17 Voting Client Securities

- A. The Registrant does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

A. The Registrant does not require clients to pay fees of more than \$1,200, per client, six months or more in advance.

- B. The Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. The Registrant has not been the subject of a bankruptcy petition.

Form ADV Part 2B – Brochure Supplement

for

Kathryn M. Brown Partner, Financial Advisor

Effective: March 20, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kathryn M. Brown (CRD# 4557865) in addition to the information contained in the Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor", CRD# 292278) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Morton Brown Disclosure Brochure or this Brochure Supplement, please contact us at (610) 709-5072.

Additional information about Ms. Brown is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with her full name or her Individual CRD# 4557865.

Item 2 – Educational Background and Business Experience

Kathryn M. Brown, born in 1979, is dedicated to advising Clients of Morton Brown as a Partner, Financial Advisor and the Chief Compliance Officer. Ms. Brown earned a B.S. in Economics and Finance from York College in 2001. Additional information regarding Ms. Brown's employment history is included below.

Employment History:

Founder, Principal, Chief Compliance Officer, Morton Brown Family Wealth LLC	02/2018 to Present
Partner, Financial Advisor and Chief Compliance Officer, Corbenic Partners, LLC	09/2011 to 03/2018
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	09/2011 to 02/2017

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

Professionals at our Firm are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP[®] professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at <u>www.cfp.net</u>.

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

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

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

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant[®] (ChFC[®]) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this

competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC[®] requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC[®] designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

CAP® (Chartered Advisor in Philanthropy®)

Candidates for the CAP[®] designation must complete a minimum of three courses in philanthropic studies through the Irwin Graduate School of The American College and six hours of rigorous, supervised written examinations. The curriculum addresses the advanced design, implementation and management of charitable gift techniques and strategies, as well and philanthropic tools including charitable trusts, private foundations, supporting organizations, donor-advised funds, pooled income funds, and charitable gift annuities. CAP[®] designees must have three-years of full-time, relevant business experience and earn 15 hours of continuing education every two years in course work directly related to the designation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Brown. Ms. Brown has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Brown. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Brown.* However, we do encourage you to independently view the background of Ms. Brown on the Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with her full name or her Individual CRD# 4557865.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Brown is also a licensed insurance professional. As an insurance professional, Ms. Brown may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Brown is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest when recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Brown or the Advisor.

Item 5 – Additional Compensation

Ms. Brown has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Brown serves as a Partner, Financial Advisor and the Chief Compliance Officer of Morton Brown. Ms. Brown can be reached at (610) 709-5072.

Morton Brown has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Morton Brown. Further, Morton Brown is subject to regulatory

oversight by various agencies. These agencies require registration by Morton Brown and its Supervised Persons. As a registered entity, Morton Brown is subject to examinations by regulators, which may be announced or unannounced. Morton Brown is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Dennis C. Morton, Jr. Partner, Financial Advisor

Effective: March 20, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Dennis C. Morton, Jr. (CRD# 5056676) in addition to the information contained in the Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor", CRD# 292278) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Morton Brown Disclosure Brochure or this Brochure Supplement, please contact us at (610) 709-5072.

Additional information about Mr. Morton is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with his full name or his Individual CRD# 5056676.

Item 2 – Educational Background and Business Experience

Dennis C. Morton, Jr., born in 1977, is dedicated to advising Clients of Morton Brown as a Partner and Financial Advisor. Mr. Morton earned a Bachelor of Arts in History from Loyola University, Maryland in 1999. Additional information regarding Mr. Morton's employment history is included below.

Recent Employment History:

Founder and Principal, Morton Brown Family Wealth LLC	02/2018 to Present
Partner, Financial Advisor, Corbenic Partners, LLC	09/2011 to 03/2018
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	09/2011 to 12/2017

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

Professionals at our Firm are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at <u>www.cfp.net</u>.

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

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

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

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant[®] (ChFC[®]) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC[®] requires three years of full-time,

relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC[®] designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Morton. Mr. Morton has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Morton. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Morton.* However, we do encourage you to independently view the background of Mr. Morton on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5056676.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Morton is also a licensed insurance professional. As an insurance professional, Mr. Morton may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Morton is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest when recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Morton or the Advisor.

Item 5 – Additional Compensation

Mr. Morton has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Morton serves as a Partner and Financial Advisor of Morton Brown and is supervised by Kathryn Brown, the Chief Compliance Officer. Ms. Brown can be reached at (610) 709-5072.

Morton Brown has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Morton Brown. Further, Morton Brown is subject to regulatory oversight by various agencies. These agencies require registration by Morton Brown and its Supervised Persons. As a registered entity, Morton Brown is subject to examinations by regulators, which may be announced or unannounced. Morton Brown is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Cody Demmel Financial Advisor

Effective: March 20, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Cody Demmel (CRD# 6341168) in addition to the information contained in the Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor", CRD# 292278) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Morton Brown Disclosure Brochure or this Brochure Supplement, please contact us at (610) 709-5072.

Additional information about Mr. Demmel is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with his full name or his Individual CRD# 6341168.

Item 2 – Educational Background and Business Experience

Cody Demmel, born in 1991, is dedicated to advising Clients of Morton Brown as a Financial Advisor. Mr. Demmel earned a Bachelor of Science in Business Adminstration with a concentration in Personal Financial Planning from Shippensburg University in 2014. Additional information regarding Mr. Demmel's employment history is included below.

Recent Employment History:

Financial Advisor, Morton Brown Family Wealth LLC	03/2020 to Present
Financial Advisor, Janney Montgomery Scott, LLC	06/2019 to 03/2020
Finanial Advisor, Morgan Stanley	08/2016 to 06/2019
Financial Advisor, Morgan Stanley Private Bank, National Association	06/2015 to 06/2019
Registered Representative, AXA Advisors	07/2014 to 06/2015

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

Professionals at our Firm are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at <u>www.cfp.net</u>.

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

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

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

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Demmel. Mr. Demmel has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Demmel. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Demmel. However, we do encourage you to independently view the background of Mr. Demmel on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6341168.

Item 4 – Other Business Activities

Mr. Demmel is not actively engaged in any non-investment-related business or occupation for compensation. .

Item 5 – Additional Compensation

Mr. Demmel has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Demmel serves as a Financial Advisor of Morton Brown and is supervised by Kathryn Brown, the Chief Compliance Officer. Ms. Brown can be reached at (610) 709-5072.

Morton Brown has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Morton Brown. Further, Morton Brown is subject to regulatory oversight by various agencies. These agencies require registration by Morton Brown and its Supervised Persons. As a registered entity, Morton Brown is subject to examinations by regulators, which may be announced or unannounced. Morton Brown is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Jonathan D. Kerstetter Financial Planner

Effective: March 20, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jonathan D. Kerstetter (CRD# 6487231) in addition to the information contained in the Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor", CRD# 292278) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Morton Brown Disclosure Brochure or this Brochure Supplement, please contact us at (610) 709-5072.

Additional information about Mr. Kerstetter is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with his full name or his Individual CRD# 6341168.

Item 2 – Educational Background and Business Experience

Jonathan D. Kerstetter, born in 1983, is dedicated to advising Clients of Morton Brown as a Financial Planner. Mr. Kerstetter earned a Bachelor of Science in Business Adminstration from Muhlenberg College in 2011. Additional information regarding Mr. Kerstetter's employment history is included below.

Recent Employment History:

Financial Planner, Morton Brown Family Wealth LLC	05/2022 to Present
Wealth Management Planning Analyst, Great Scott Financial Services	10/2019 to 04/2022
Registered Staff Member, Commonwealth Financial Network	10/2019 to 04/2022
Registered Representative, Cetera Advisor Networks LLC	04/2017 to 10/2019

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

Professionals at our Firm are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP[®] professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at <u>www.cfp.net</u>.

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

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

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

- Ethics Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ACCREDITED ASSET MANAGEMENT SPECIALISTSM (AAMS[®])

The AAMS[®] is awarded by the College for Financial Planning[®] to investment professionals who complete its 12module 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

There are no legal, civil or disciplinary events to disclose regarding Mr. Kerstetter. Mr. Kerstetter has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kerstetter. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kerstetter. However, we do encourage you to independently view the background of Mr. Kerstetter on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6487231.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Kerstetter is also a licensed insurance professional. As an insurance professional, Mr. Kerstetter may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kerstetter is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest when recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kerstetter or the Advisor.

Item 5 – Additional Compensation

Mr. Kerstetter has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Kerstetter serves as a Financial Advisor of Morton Brown and is supervised by Kathryn Brown, the Chief Compliance Officer. Ms. Brown can be reached at (610) 709-5072.

Morton Brown has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Morton Brown. Further, Morton Brown is subject to regulatory oversight by various agencies. These agencies require registration by Morton Brown and its Supervised Persons. As a registered entity, Morton Brown is subject to examinations by regulators, which may be announced or unannounced. Morton Brown is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Sean A. Roth Financial Planner

Effective: March 20, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Sean A. Roth (CRD# 6917813) in addition to the information contained in the Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor", CRD# 292278) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Morton Brown Disclosure Brochure or this Brochure Supplement, please contact us at (610) 709-5072.

Additional information about Mr. Roth is available on the SEC's Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u> by searching with his full name or his Individual CRD# 6917813.

Item 2 – Educational Background and Business Experience

Sean A. Roth, born in 1994, is dedicated to advising Clients of Morton Brown as a Financial Advisor. Mr. Roth earned a Bachelor of Science in Finance from East Strousburg University in 2016 and an Associates in General Studies from Lehigh Carbon Community College in 2014. Additional information regarding Mr. Roth's employment history is included below.

Recent Employment History:

Financial Advisor, Morton Brown Family Wealth LLC	11/2023 to Present
Financia Advisor, CapTrust	07/2023 to 10/2023
Financial Advisor, Morgan Stanley	06/2018 to 07/2023

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Roth. Mr. Roth has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Roth. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Roth.* However, we do encourage you to independently view the background of Mr. Roth on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6487231.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Roth is also a licensed insurance professional. As an insurance professional, Mr. Roth may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Roth is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest when recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Roth or the Advisor.

Item 5 – Additional Compensation

Mr. Roth has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Roth serves as a Financial Advisor of Morton Brown and is supervised by Kathryn Brown, the Chief Compliance Officer. Ms. Brown can be reached at (610) 709-5072.

Morton Brown has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Morton Brown. Further, Morton Brown is subject to regulatory oversight by various agencies. These agencies require registration by Morton Brown and its Supervised Persons. As a registered entity, Morton Brown is subject to examinations by regulators, which may be announced or unannounced. Morton Brown is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective Date: March 20, 2024

Our Commitment to You

Morton Brown Family Wealth LLC ("Morton Brown" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Morton Brown (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Morton Brown does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities	
Name, address and phone number(s)	Income and expenses	
E-mail address(es)	Investment activity	
Account information (including other institutions)	s) Investment experience and goals	

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Morton Brown does not disclose, and does not intend to disclose, personal information with non-afffiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Morton Brown or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Morton Brown does not disclose and does not intend to disclose, non- public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (610) 709-5072.