



79 FINANCIAL

Form ADV Part 2A Brochure

79 Financial LLC

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CRD #316208

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This Brochure provides information about the qualifications and business practices of 79 Financial LLC. If you have any questions about the contents of this Brochure, please contact us at (412) 585-0797 or info@79financial.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. Registration as an Investment Adviser does not imply a certain level of skill or training.

Additional information about 79 Financial LLC is available at the following website: www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for 79 Financial LLC is 316208.

ITEM 2. SUMMARY OF MATERIAL CHANGES

Since 79 Financial LLC's ("79 Financial" or the "Firm") previous filing on March 18, 2022, the Firm has become registered as an investment adviser in the state of Louisiana. As of December 31, 2022, 79 Financial had \$22,845,090 in discretionary assets under management.

79 Financial commenced offering Student Loan Repayment Advisory Services (SLRAS) as an additional service to complement its financial planning services. SLRAS are a comprehensive evaluation of a client's options to their repayment of student loans. Related fees were detailed in the Fees & Expenses section.

Pertaining to Retirement Plan Rollovers, 79 Financial added the capability to be granted authority to manage client's retirement plans at their current plan custodian eliminating the need to rollover the plan to a qualified account. This capability provides us with the ability to include a larger portion of clients' portfolios when managing their overall risk-based allocation.

Pertaining to Proxy Voting, 79 Financial clarified that it could have authority to vote proxies on behalf of advisory clients if the client has elected in the account paperwork to have a third-party manager or 79 Financial vote proxies.

Amended the Advisory Business section to include non-investment related services. Related fees were detailed in the Fees & Expenses section.

There are no other material changes to report at this time.

79 Financial will provide clients with a summary of any material changes to this Brochure since the Firm's last annual update within 120 days of the close of the Firm's fiscal year end. 79 Financial may provide additional interim disclosure about material changes, as warranted. For a current copy of the Firm's Brochure, please contact us at (412) 585-0797 or info@79financial.com.

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ITEM 4. ADVISORY BUSINESS

Our Firm's History

79 Financial LLC ("79 Financial", the "Firm", "we", "us", "our"), headquartered in Cranberry Township, Pennsylvania, is a limited liability company formed in July 2021 to provide investment management and financial planning services primarily to high-net-worth investors, family offices, and small businesses.

Firm Owners

Edward G. Jenkins, III is the sole owner and Managing Member of 79 Financial.

Investment Management Services

When delivering investment management services, we provide ongoing investment advice to our clients through a process of building risk-based allocations in an attempt to meet their future goals and objectives. To the extent possible, portfolios are constructed by utilizing tax efficient investment products with low expenses that collectively create a portfolio that displays risk characteristics determined to be in line with their determined tolerance and capacity. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop an investment policy and subsequently build and manage the client's portfolio based on that policy. During the data-gathering process, we determine the client's investment objectives, time horizon, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as financial background. We manage client accounts on a discretionary basis. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Separately Managed Account Programs and Independent Managers. For certain eligible clients, we may allocate (and/or recommend that the client allocate) a portion of a client's investment assets to unaffiliated Separately Managed Account Programs ("SMAs") and/or independent investment managers ("Independent Managers") in accordance with the client's designated investment objectives and our internal due diligence standards. In such situations, the SMAs or Independent Managers shall have day-to-day responsibility for the active discretionary management of the allocated assets. 79 Financial shall continue to render investment advisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which we will consider in recommending an SMA or Independent Manager(s) include the client's designated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fee charged by the Independent Manager(s) is separate from, and in addition to, 79 Financial's investment management fee as set forth in Item 5.

Financial Planning Services

79 Financial provides financial planning services that are not to be confused with the provision of investment advice. Financial planning is a comprehensive evaluation of a client's current and anticipated future financial condition. The Firm will utilize current information regarding the client's financial status to project future cash flows, anticipated asset values and principal withdrawal plans. Sound financial planning is a holistic process wherein client lifestyle aspirations are reconciled to current and anticipated financial net worth. A thorough query of current and desired lifestyle in concert with a comprehensive review of the client's personal income and balance sheet statements are reviewed in detail and reconciled to an agreed financial plan which encompasses articulated objectives, funding sources and anticipated withdrawal scenarios. Clients engaging 79 Financial for this service receive a written report which provides the client with a detailed financial plan designed to assist the client in achieving his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- Personal: review of family records, budgeting, personal liability, estate information and financial goals.
- Tax and cash flow: analysis of the client's income tax, spending, and planning for past, current, and future years; then illustration of the impact of various investments on the client's current and future income and tax liability.
- Investments: evaluation of current investment performance and its ability to fund the plan.
- Retirement: analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Death and disability: review of the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.

79 Financial gathers required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes about risk. We carefully review documents supplied by the client to facilitate the preparation of a written report. Typically, the financial plan is presented to the client within one to two months of the date of the agreement, provided that all information needed to prepare the financial plan has been promptly provided. Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or investment advisor. 79 Financial is available to implement the client's investment plan, with such services offered separately under our investment management services. Implementation of financial plan recommendations is entirely at the client's discretion.

Conflict of Interest Statement – Financial Planning Services

79 Financial does not receive compensation (e.g., commissions or fees) from the sale of securities, insurance, real estate or other products or services recommended in a financial plan. However, 79 Financial would receive investment management fees if the financial plan incorporates an allocation of the client's assets to 79 Financial. Such a recommendation, if made, would present a conflict between the interests of 79 Financial, and the interests of the financial planning client. Financial planning clients are under no obligation to act upon any recommendation made by us, including a recommendation to allocate assets to 79 Financial. If the client elects to act on any of the recommendations we make, the client is under no obligation to effect transactions through 79 Financial, our representatives, or affiliates.

Student Loan Repayment Advisory Services (SLRAS)

79 Financial provides SLRAS as a stand-alone plan, or as an extension of a financial plan, that are not to be confused with the provision of investment advice. SLRAS are a comprehensive evaluation of a client's options to their repayment of student loans. The Firm will utilize the client's student loan data, certain tax information, projected income changes, and employer information to provide a simple single view that displays repayment options, including debt structure and the different tax filing options that will impact the monthly payment. Clients engaging 79 Financial for this service receive a written report which provides the client with a detailed repayment plan.

Non-investment related services

Non-investment related services will be billed at the rate of \$250 per hour in fifteen-minute intervals. An invoice will be provided detailing the dates, services provided, hours billed, and amount to be debited from the Client's account or paid with separate funds based on the Client's preference.

Written Agreement

Prior to engaging 79 Financial, clients are required to enter into a written Investment Management Agreement or Financial Planning Agreement, which discloses, in substance, a description of services to be provided, the term of the agreement, discretionary authority conveyed to 79 Financial if applicable, fees and formula for computing such fees, terms associated with the return of fees in the event of agreement termination or nonperformance, and a non-assignment clause, among other provisions.

For investment management clients, we recommend Charles Schwab and Co., Inc. (“Schwab”) for client broker-dealer and custody services, although clients may select an alternative custodian. 79 Financial’s investment management services include the development of an investment policy statement, or similar document, and the discretionary management of the client’s portfolio.

Types of Investments upon Which Advice is Offered

79 Financial offers advice primarily on the following types of investments, although other security types may be considered on a case-by-case basis:

- Exchange-listed equity securities
- Exchange-Traded Funds
- Fixed-income securities
- Convertible bonds
- Cash and cash equivalents

Client Imposed Investment Restrictions

Although rare, there may be circumstances wherein a client does not desire a particular security, asset, or sector to be included in their portfolio. If this occurs, 79 Financial will discuss any possible implications such investment constraints may cause and document any reasonable constraints in the client’s investment policy statement (or similar document).

Client Obligations

Clients are advised that the investment recommendations and advice offered by 79 Financial do not represent legal or accounting advice. Clients should coordinate and discuss the impact of financial advice with their attorneys and/or accountants. In performing our services, 79 Financial will 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 79 Financial if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising 79 Financial’s previous recommendations and/or services. Failure to notify 79 Financial of any such changes could result in investment recommendations not meeting their needs.

Non-Participation in Wrap Fee Programs

79 Financial does not participate in wrap fee programs. A wrap fee program is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client's account.

Retirement Plan Rollovers

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 79 Financial recommends that a client roll over their retirement plan assets into an account to be managed by 79 Financial or recommends that 79 Financial be granted authority to manage their current retirement plan

at its current plan custodian, such recommendations create a conflict of interest if 79 Financial will earn an investment management fee on the assets. No client is under any obligation to roll over or grant management authority on retirement plan assets to be managed by 79 Financial.

Amount of Assets Under Management

As of December 31, 2022, 79 Financial had \$22,845,090 in discretionary assets under management.

ITEM 5. FEES AND COMPENSATION

Investment Management Fee Schedule

79 Financial's fee for investment management services is based upon a percentage of assets under management (including cash) and is charged up to a rate of 1.0% per annum. This fee does not include any third-party manager fees, if applicable. 79 Financial does not impose a minimum account size, although the Firm reserves the right to do so in the future, if such a minimum is necessary to assist clients in achieving their investment objectives. Third-party managers may impose an account minimum, however.

Fees are negotiable and may be modified or changed by 79 Financial upon advance written notice to the client. Factors impacting negotiation include size of portfolio, expected future cash flows, client service requirements, and portfolio complexity, among other factors. 79 Financial may amend and/or increase fees if the Firm provides the client with written notice of the amendment 30 days in advance of such fee change.

Fees are billed either monthly or quarterly in arrears, based on Assets Under Management ("AUM") computed by the client's custodian, in accordance with the terms of the Investment Management Agreement. For partial periods, fees are prorated for the number of days in which assets were under management divided by the total number of days in the billing period. All material asset contributions/withdrawals are prorated to reflect an adjusted ending balance for the period in which the contribution/withdrawal occurred. Client fee payment is due within 30 days following the end of the billing period. To the extent that the client engages 79 Financial at any point following the first day of a billing period, the client's fee will be prorated from the date of engagement through the end of the billing period. In the event of an early client termination, the period's fee amount will be based on the value of the client's account on the date of termination.

Financial Planning Fee Schedule

79 Financial's financial planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into the Financial Planning Agreement with any client.

Our financial planning fees are calculated and charged on an hourly basis, ranging from \$250 - \$350 per hour. Although the length of time it will take to provide a financial plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the planning relationship. Our financial planning fees may be calculated and charged on a fixed fee basis, typically ranging from \$500 to \$5,000, depending on the specific arrangement reached with the client. Fees are negotiable and may be modified or changed by 79 Financial upon advance written notice to the client.

79 Financial reserves the right to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our investment management services.

The Financial Planning Agreement may be terminated at any time upon receipt of written notice to terminate given by either party to the other. One-half of the estimated total cost shall be due and payable upon the

signing of the Financial Planning Agreement and the balance shall be due and payable upon completion of the agreed upon services as disclosed in Exhibit A of the Financial Planning Agreement.

Student Loan Repayment Advisory Services (SLRAS) Fee Schedule

79 Financial's SLRAS fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into the SLRAS Agreement with any client.

Our SLRAS fees are based on a fixed rate of \$750 plus a complexity fee calculated and charged on an hourly basis at \$50 per hour. The complexity fee is only added at 79 Financial's discretion to certain analysis that require more service and complex analysis. We will provide an estimate for the total hours required as soon as it has become evident that a complexity fee is necessary. Fees are negotiable and may be modified or changed by 79 Financial upon advance written notice to the client.

79 Financial reserves the right to reduce or waive the hourly fee and/or the minimum fixed rate for any reason including if a SLRAS client chooses to engage us for our investment management services or financial planning.

The SLRAS Agreement may be terminated at any time upon receipt of written notice to terminate given by either party to the other. The fixed rate \$750 shall be due and payable upon the signing of the SLRAS Agreement and any balance shall be due and payable upon completion of the agreed upon services as disclosed in Exhibit A of the SLRAS Agreement.

Non-Investment Related Services Fee Schedule

Non-investment related services will be billed at the rate of \$250 per hour in fifteen-minute intervals. An invoice will be provided detailing the dates, services provided, hours billed, and amount to be debited from the Client's account or paid with separate funds based on the Client's preference.

Variation of Fees

79 Financial does not impose a minimum account size, although the Firm reserves the right to do so on a case-by-case basis, if such a minimum is necessary to assist clients in achieving their investment objectives. Clients are subject to 79 Financial's investment management fee schedule in effect at the time the client enters into the investment management relationship, and/or executes its Investment Management Agreement. Therefore, fee schedules will differ among clients.

Clients will never be charged a total annual management fee over the 3% industry average. As a practical matter, 79 Financial annual investment management fees are expected to be 1% or lower.

Fee Discounts and Waivers

79 Financial may group or "household" certain related client accounts for the purposes of determining the annualized fee. Discounts, not generally available to our investment management clients, may be offered to family members and friends of associated persons of our Firm.

79 Financial shall deliver a Firm Brochure and Supplement to every client or prospective client. When a client has not received a copy of the Brochure and Supplement at least 48 hours prior to signing an agreement, the client has five business days in which to cancel, with no penalty, or for a full refund (if any fees were prepaid).

Automatic Fee Deduction

79 Financial may, as authorized by clients, direct each client's account custodian to debit from the client's account and pay 79 Financial the investment management fee due from the client. In connection with this process, the Firm shall:

- Initially obtain written authorization from the client permitting 79 Financial's fees to be paid directly from the client's account.
- Communicate with each client's custodian regarding the amount of fee to be paid to 79 Financial on the client's behalf (the "fee invoice").
- Ensure that the independent custodian agrees to send the client, at least quarterly, a statement indicating all amounts disbursed from the account.
- The Firm will deliver a fee invoice to each client for the amount equal to the advisory fee due from the client for payment along with the calculation formula.

Exchange-Traded Fund and Mutual Fund Fees

All fees paid to 79 Financial for investment management services are separate and distinct from the fees and expenses charged by Exchange-Traded Funds ("ETFs") or Mutual Funds to their shareholders. These fees and expenses are described in each ETF or Mutual Fund prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the ETF or Mutual Fund also imposes sales charges, a client may pay an initial or deferred sales charge. 79 Financial will seek to select the most cost-efficient ETFs and Mutual Funds that meet each client's needs.

Alternatively, clients generally can invest in an ETF or Mutual Fund directly, without our services and expertise, thereby limiting their expenses while prospectively increasing suitability risk. Accordingly, the client should review both the fees charged by the ETFs/Mutual Funds and 79 Financial's investment management fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the services being provided.

Third-Party Manager Fees

Third-party money managers generally have minimum account balance requirements ("account minimums") or minimum account fees. The account minimums will vary among third-party money managers. Account minimums are generally higher on fixed income accounts than on equity-based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.

The actual fee charged to you will vary depending on the third-party money manager. All fees are calculated and collected by the third-party money manager, and such fees are in addition to 79 Financial's investment management fee. Your specific fee charged for the third-party asset management program, will be disclosed in your Investment Management Agreement with them.

We have a conflict of interest by only offering those third-party money managers that meet the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

Additional Fees and Expenses

In addition to our investment management fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, commissions, bid-ask spreads, and any transaction charges imposed by the custodian or broker-dealer with whom we effect transactions for the client's account(s). Regulators, exchanges, and other third-party facilitators involved in the execution and settlement processes of traded securities may also impose nominal fees which are borne

directly by our clients. Please refer to the Item 12 - Brokerage Practices for additional information.

Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. For more information on brokerage practices applicable to clients who custody their accounts at Schwab, refer to Item 12 of this Brochure.

Termination of the Investment Management Agreement

The Investment Management Agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period. Likewise, any fees due to the Firm based on a partial billing period will be calculated through the date of termination.

Comparable Services

79 Financial believes that the charges and fees offered for its investment management services are competitive with alternative programs available through other firms offering a similar range of services. Lower fees for comparable services may be available from other sources. All future conflicts of interest that arise relating to the percentage-based compensation fees we receive from the client will be properly disclosed to the client. A conflict of interest can exist in any form of compensation; however, we have adopted internal policies to properly manage these and other potential conflicts of interest. 79 Financial's goal is that financial advice provided to the client remains at all times in the client's best interest. 79 Financial charges for investment management services based on account assets under management. This is a very common form of compensation for investment advisory firms, and we believe, avoids the multiple inherent conflicts of interest associated with commission-based compensation.

No Other Compensation

79 Financial is compensated directly by our clients for investment management services. The Firm does not receive any third-party compensation, 12b-1 fees, or commissions stemming from any advice or products it recommends, including asset-based sales charges or service fees from the sale of ETFs or mutual funds.

ITEM 6. PERFORMANCE-BASED FEES

79 Financial does not offer performance-based fees to its clients, which are fees based on a share of capital gains on or capital appreciation of the assets held in a client's portfolio.

ITEM 7. TYPES OF CLIENTS

79 Financial offers investment management services primarily to individuals, high net worth individuals, family offices, banking or thrift institutions, charitable organizations, corporations, and other small businesses. The Firm may offer its services to other client types if determined that 79 Financial's investment strategies are suitable. The Firm does not impose a minimum account size, although the Firm reserves the right to do so on a case-by-case basis, if such a minimum is necessary to assist clients in achieving their investment objectives.

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Strategy

Before investing a client's portfolio, 79 Financial will develop an investment policy statement or similar document to establish a clear understanding between the client and the Firm as to the investment goals and objectives and management policies applicable to the client's investment portfolio. The client should understand that buying securities involves risk and the investment policy statement (or similar document) is created to provide a plan to manage the client's assets for an expected rate of return with an acceptable amount of risk. However, all investment plans involve risk, and there is no guarantee that a client's investment objectives will be met.

As an investment adviser we feel our first priority is to be a risk manager for our clients. We therefore customize portfolios based on each client's unique needs, goals, and appetite for risk. We recognize that our clients have worked their whole lives to create investment portfolios to fund retirement, assist family members, and support charitable endeavors, among other pursuits. At the same time, we believe that our clients seek to generate long-term investment returns that meet their objectives. Our strategy is one of diversification, using a variety of investment vehicles, where warranted, including stocks, bonds, convertible bonds, ETFs, and mutual funds.

Frequent interaction with our clients is essential to achieving the best possible outcomes. Client risk profiles and investment objectives can change. Life circumstances and investment goals vary over time. To facilitate frequent communication, we communicate with clients regularly. And of course, we are available to our clients anytime. Clients are expected to notify 79 Financial when their investment objectives and/or financial circumstances change.

Asset Allocation

79 Financial endeavors to develop and maintain an appropriate ratio of equity, fixed income, cash, and if appropriate to the client risk profile, alternative asset allocations which complement the client's investment goals and risk tolerance.

An inherent risk to any asset allocation strategy remains the possibility that while a specific allocation is being implemented, the client may not participate in sharp increases in the value of a specific security, industry, or market sector. Another risk is that the weighting of equity, fixed income, alternative investments, and cash will change over time due to non-linear appreciation/depreciation and therefore the original allocation will change in a potentially adverse manner if not appropriately monitored and corrected.

Methods of Analysis; Sources of Information

We primarily use fundamental analysis to formulate investment advice for clients. 79 Financial measures what we believe is the fair value of a security by analyzing economic and financial factors and events which affect the security's asset class (e.g., equity or fixed income), the industry sector (e.g., financial services, energy, health care and consumer durables) and the specific security itself. These fundamental factors and events relate to the overall economy, industry trends regarding sales and earnings, and the financial condition and management of the security issuer itself to determine what we perceive to be the fair value for the security under review for acquisition (undervalued) or sale (overvalued). This fair value process places heavy reliance upon the theory that securities issued by a competently managed company will generally revert, over time, to their mean price valuation, all things being equal.

Stock Analysis

79 Financial's security analysis is based upon a number of factors including those derived from commercially available software technology, securities rating services, general economic and market information, due diligence reviews, and specific investment analyses that clients may request. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, academic whitepapers, and periodicals. Prospectuses, statements of additional information, corporate filings, other issuer prepared information, and data aggregation services are also utilized.

Mutual Fund and/or ETF Analysis

79 Financial analyzes the experience and track-record of the manager of the mutual fund or ETF to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. For example, if a manager consistently outperformed the fund's benchmark (referred to as alpha) this would reflect positively in our due diligence for that specific manager. 79 Financial also looks at the underlying assets in a mutual fund or ETF to determine if there is significant overlap in the underlying investments held in another fund(s) or concentrations of securities held in the client's portfolio. 79 Financial also monitors the funds and ETFs to ascertain whether the manager follows the investment mandate of the fund or ETF. There is a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful in the past may not be able to replicate that success in the future. In addition, as 79 Financial does not control the underlying investments in a mutual fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value.

An added risk with mutual funds is that fund managers control the reaping of capital gains and losses thereby largely limiting the ability for fund investors to coordinate tax strategy when these investment vehicles are utilized in a client portfolio. At times, this risk may be quite significant if the fund is purchased within the client's portfolio immediately prior to the declaration of a large capital gain wherein the client would assume the tax liability with other investors while not participating in the upside which produced the gain.

Both ETF and mutual funds have various fees and expenses associated with the particular product which must be borne by the client. These fees and expenses are discussed in the applicable prospectus, which should be evaluated by clients.

Third-Party Money Manager Analysis

We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory, or reputational deficiencies.

Risks for all Forms of Analysis

79 Financial's securities analysis methods rely on the assumption that for the companies whose securities are purchased and sold, the data analyzed, the rating agencies that review these securities, and other publicly available sources of information about these securities, are reasonably accurate and unbiased in content and origin. While 79 Financial is alert to indications that data may be incorrect or non-objective, there is always a risk that inaccurate or misleading information compromises our analysis.

Risk of Loss, in General

Investing in securities involves a risk of loss that clients should be prepared to bear. Our investment recommendations seek to mitigate risk through asset allocation and investment due diligence. However, there is no guarantee that these risk mitigation tactics will work.

Risk of Loss, Market and Securities

- **General Investment Activities.** Our investment activities involve a degree of risk. The performance of any investment is subject to many factors which are neither within the control of nor predictable by the Firm. Such factors include a wide range of economic, political, competitive, technological, and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect our ability to generate profits in client portfolios.
- **Equity Security Risk.** Equities are exposed to general stock market swings and changes in the business cycle which may alter market opinions about the short-term or long-term prospects for an issuer of equity securities.
- **Smaller Cap Equity Security Risk.** Although we typically invest in the larger cap segment of the market, we may from time to time invest in small cap equity securities in a client portfolio. Equity investments in smaller companies involve added risks, such as limited liquidity and greater fluctuations in their perceived values, which may impact our ability to sell these investments at a fair and competitive price in a timely manner.
- **Fixed Income Security Risk.** Rising interest rates tend to cause the prices of debt securities (especially those with longer maturities) to fall. The credit rating or financial condition of an issuer may affect the value of a debt security. Generally, the lower the quality rating of a security, the greater the risk that the issuer will fail to pay interest fully and return principal in a timely manner. The issuer of an investment-grade security is more likely to pay interest and repay principal than an issuer of a lower rated bond. Credit ratings are not an absolute standard of quality, but rather general indicators that reflect only the view of the originating rating agencies from which an explanation of the significance of such ratings may be obtained. If an issuer defaults or becomes unable to honor its financial obligations, the security may lose some or all of its value.
- **Municipal Security Risk.** Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.
- **Exchange-Traded Fund ("ETF") Risk.** ETFs are subject to risks like those of stocks and may not be suitable for all investors. Shares can be bought and sold through a broker, and the selling shareholder may have to pay brokerage commissions in connection with the sale. Investment returns and principal value will fluctuate so that when shares are redeemed, they may be worth more or less than original cost. Shares may only be redeemed directly from the fund. There can be no assurance that an active trading market for the shares will develop or be maintained, and shares may trade at, above or below their net asset value. Additionally, ETFs are not structured as

investment companies and thus are not regulated under the Investment Company Act of 1940. ETFs incur fees that are separate from those fees charged by the adviser.

- **Mutual Fund Risk.** Mutual fund investing involves risk; principal loss is possible. Investors will pay fees and expenses, even when investment returns are flat or negative. Investors cannot influence the securities bought and sold, nor the timing of transactions which may result in undesirable tax consequences.
- **Money Market Fund Risk.** A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.
- **Independent Manager Selection Risk.** When client assets are invested by outside professional asset managers, 79 Financial does not directly control the investment decisions of outside managers. An independent manager may stray from its stated investment strategy (known as "style drift") or make poor investment decisions which place client assets at greater risk of loss.

Risk associated with New Entity

Although 79 Financial's founder has investment advisory experience, 79 Financial is a newly formed investment advisory entity, which may limit 79 Financial's effectiveness. In addition, given the Firm's size, 79 Financial has limited resources, which may limit its ability to serve clients if the founder becomes incapacitated.

Business Risks Related to COVID-19

The global spread of the coronavirus disease (COVID-19) was declared a pandemic by the World Health Organization. COVID-19 has caused volatility, severe market dislocations, and liquidity constraints in many financial markets and may adversely affect client investments and performance. In addition, COVID-19 and the various governmental, industry, and consumer actions related to the containment thereof, could have negative effects on our business and risk exposure. This pandemic may result in substantial market volatility and may adversely impact the prices and liquidity of client portfolio investments.

Cash Balances in Client Accounts

79 Financial considers cash to be an asset class. Cash held in the client's investment accounts are typically swept into the money market fund accounts or money market bank accounts at the client's custodian. During periodic portfolio reviews, 79 Financial will generally discuss upcoming cash flow needs with each client and seeks to plan accordingly to meet those needs. 79 Financial includes cash and cash equivalents in the calculation of assets under management and fees. During periods of exceedingly low short-term interest rates, client fees paid on cash balances will exceed money market yields.

ITEM 9. DISCIPLINARY INFORMATION

79 Financial is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. There are no disciplinary events to report for 79 Financial or any of its employees.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither 79 Financial nor Mr. Jenkins are registered or have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or representative of the foregoing.

When 79 Financial recommends or selects independent third-party investment managers for client asset allocation purposes, 79 Financial is not paid by such investment managers. All revenue earned by 79 Financial is sourced directly from client fees paid to the Firm. 79 Financial is not involved in any other financial industry activities or affiliations.

79 Financial retains a fiduciary duty to our clients. This duty requires the Firm to disclose and responsibly manage or remove all current and emergent conflicts of interest or a material nature. A conflict of interest is best defined as a set of circumstances (involving individuals, entities, or events) that creates a risk that professional judgment or actions regarding client interests will be unduly influenced by a secondary interest (the set of circumstances referenced).

It is the policy of 79 Financial to place the interest of its clients first and foremost at all times and to disclose and responsibly manage all conflicts of interest. To achieve this policy objective, we have implemented the following controls and procedures to ensure that client accounts are managed, and that our investment advice is developed and conveyed, in congruence with our fiduciary standard of care:

- We disclose to clients the existence of all material current and emergent conflicts of interest, including the potential for 79 Financial and its employees to earn compensation from advisory clients in addition to advisory fees;
- We disclose to clients that they are not obligated to purchase recommended investment products or services from us;
- We develop, maintain and document accurate, complete, and relevant client background information, including the client's financial goals, objectives, and risk tolerance;
- We conduct regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- The 79 Financial Code of Ethics requires employees to report any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed; if these outside business activities present a material conflict, they will be disclosed to clients;
- We monitor, as necessary, these outside employment activities to verify that any conflicts of interest continue to be properly addressed by 79 Financial;
- As fiduciaries, we formulate a reasonable and independent basis for the investment advice provided to clients; and
- When we work with other advisers or investment managers, we endeavor to confirm that these other advisers and investment managers are properly licensed or registered as an investment adviser, broker-dealer, or registered as otherwise required, prior to engagement.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Material Conflicts of Interest

79 Financial seeks to avoid material conflicts of interest. 79 Financial does not receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms, custodians, or mutual fund companies with respect to investment management clients. Neither 79 Financial nor any employee of 79 Financial recommends, buys, or sells for client accounts, securities in which 79 Financial or any employee of 79 Financial has a material financial interest.

Our Code of Ethics

79 Financial has a Code of Ethics to which employees are bound to adhere. The key components of our Code of Ethics reflect the following precepts:

- The interests of clients are placed ahead of the Firm's or any employee's own investment interests.
- Employees are expected to conduct their personal securities transactions in accordance with the Firm's Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest with clients.
- Employees will not take inappropriate advantage of their position with the Firm.
- Employees are expected to act in the best interest of each client.
- The Firm's Code of Ethics includes a policy prohibiting the use of material non-public information. While we do not believe that we have any unique access to non-public information, employees are reminded that such information may not be used in a personal or professional capacity.
- Employees are expected to comply with applicable securities laws, outlined in the Compliance Manual/Code of Ethics.

79 Financial will provide a complete copy of the Code of Ethics to any client or prospective client upon request by contacting us at (412) 585-0797 or info@79financial.com.

Participation or Interest in Client Transactions and Personal Trading

Our Code of Ethics provides that, for their personal accounts, employees may buy or sell securities that are identical to or different than those recommended to clients. To supervise compliance with the Code of Ethics, 79 Financial requires that employees provide annual securities holding reports and quarterly securities transactions reports to the Firm. In instances where 79 Financial and/or its employees buy or sell the same securities as those of their clients, such transactions will occur after client account transactions in the same securities. These practices, as governed by our Code of Ethics, are designed to remove any conflicts of interest associated with the personal trading activities of employees.

ITEM 12. BROKERAGE PRACTICES

Brokerage Firm Selection and Best Execution

79 Financial recommends to its clients the brokerage/custodian services of Charles Schwab and Co., Inc. ("Schwab"), Member FINRA/SIPC¹. 79 Financial is independently owned and operated and not affiliated with Schwab. As custodian, Schwab will hold client assets in a brokerage account and buy and sell securities

¹ 79 Financial is not, nor is required to be, a FINRA or Securities Investor Protection Corporation (SIPC) member. You may learn more about SIPC and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

when 79 Financial instructs them to do so. While 79 Financial recommends that clients use Schwab as a custodian, clients will decide whether to do so, and may select a different qualified custodian. Your custodial account will be entered into via an account agreement executed between you and the custodian. We technically do not open the account for you, although we may assist you with the paperwork. Schwab offers investment advisers' services, which include custody of securities, trade execution, clearance, and settlement of transactions. 79 Financial may receive other benefits from Schwab through participation in their investment adviser support program (please see Item 14). We periodically conduct an assessment of any service provider we recommend, including Schwab, which includes a review of their range of services, reasonableness of fees, among other items, and in comparison to industry peers.

79 Financial does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account for purposes of fee payment (see Item 15 below). Conflicts of interest associated with this arrangement are described later in this Item 12, as well as in Item 14. You should consider these conflicts of interest when selecting your custodian.

In seeking "best execution", the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of the broker-dealer's services including execution capability, commission rates or transaction fees, the value of research provided, reputation, and responsiveness. 79 Financial typically trades each client's account with the client's custodian to avoid trade-away fees. Though we will seek competitive commission rates, and when available zero commission rates, we may not obtain the lowest possible commission rates for account transactions in all cases.

79 Financial reviews the commission and fee schedule of Schwab in relation to other custodians in an effort to determine the competitiveness of Schwab's services. In selecting and/or recommending custodians, we do not take into consideration whether or not we will receive client referrals from the custodian.

Aggregation of Client Trades

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same security for several clients using the same custodian at approximately the same time. We may (but are not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among participating clients in proportion to the aggregated purchase and sale orders placed for each client account at the same custodian on any given day.

Research and Soft Dollar Benefits

79 Financial realizes that brokerage commissions are the property of our clients. As the investment manager, we have an ongoing responsibility to ensure the quality of all transactions effected on behalf of clients, including seeking to obtain best execution and minimizing transaction costs (market impact plus commissions, if applicable).

We may receive economic benefits from Schwab or another client's custodian in the form of various products and services they make available to us and other independent investment advisers that may not be typically available to a "retail investor." These benefits may include the following products and services (provided either without cost or at a discount):

- Receipt of duplicate client statements and confirmations;
- Pricing information and market data;
- Research related products and tools;

- Access to trading desks serving our clients; access to block trading which allows our firm to aggregate securities transactions for execution and then allocate the appropriate shares to our client's accounts;
- The ability to have advisory fees deducted directly from our client's accounts per our written agreement;
- Access to an electronic communications network for client order entry and account information;
- Access to mutual funds with no transaction fees and to certain institutional money managers;
- Discounts on marketing, research, technology, and practice management products or services provided to our firm by third party vendors; and
- Business consulting or other professional services. Some of the noted products and services made available by Schwab or another client custodian, through a sponsored program, may benefit our firm but may not directly benefit a client account, and certain research and other previously referenced services may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Schwab or another client custodian benefits 79 Financial because we do not have to produce or purchase them as long as our clients maintain assets in accounts at these custodians. Therefore, there is an appearance of a conflict of interest since we may have an incentive to select or recommend a particular broker/dealer as custodian based on our firm's interest in receiving these benefits rather than on our clients' interest in receiving favorable trade execution.

In accordance with our fiduciary duty, 79 Financial endeavors at all times to put the interests of our clients first. We believe it is important to mention that the benefit received by 79 Financial through participation in a custodian's program does not depend on the amount of brokerage transactions directed to either Schwab or another client custodian, and our selection of Schwab and/or another client custodian is based on what we believe is in the best interests of our clients, considering the scope, quality, and price of custodial services rather than solely on the basis of those services that benefit only 79 Financial.

Directed Brokerage

We recommend that clients use Schwab as their custodian, however clients are permitted to use the custodian of their choosing. Not all advisory firms permit you to direct brokerage. If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through Schwab. Generally, we will not negotiate lower rates below the rates established by the executing custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction. In all instances, we will seek best execution for you.

Non-Participation in Client Referral Programs

79 Financial does not participate in client referral programs that may be sponsored by custodians or investment product providers.

ITEM 13. REVIEW OF ACCOUNTS

Client Reviews – Investment Management

While the underlying securities within investment management accounts are continually monitored, these accounts are formally reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as material cash flows, the client's individual circumstances, or the market, political or economic environment.

Client accounts are reviewed by Edward G. Jenkins, III, Managing Member/Financial Advisor. Significant exceptional activity in client accounts and/or changes in client suitability and investment risk thresholds, as conveyed by the client or the client's agent, are documented in this formal review process.

Client Reports – Investment Management

In addition to the monthly statements and confirmations of transactions that clients receive from their custodian, 79 Financial may provide quarterly reports summarizing account performance, balances, and holdings. Clients are urged to carefully review and compare any report they may receive from the Firm to statements received from their qualified custodian. 79 Financial reports may vary from custodial statements based on differences between accounting procedures, reporting dates, or valuation methods for certain securities.

Client Meetings – Investment Management

Edward G. Jenkins, III, Managing Member/Financial Advisor may also schedule client meetings on a periodic basis, or request basis, to review the client's portfolio, performance, market conditions, financial circumstances, and investment objectives, among other things, to confirm that 79 Financial's investment decisions and services are consistent with the client's objectives and goals.

Client Reviews – Financial Planning

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for financial planning clients unless explicitly contracted for. Plan progress reviews for financial planning clients who have elected to have 79 Financial implement its investment advisory services will be conducted twice a year or as needed based on client request or changing assumptions.

Client Reports – Financial Planning

Under the terms of a Financial Planning Agreement, a client's accounts and source information will be reviewed as contracted for at the inception of the engagement. Each financial planning client will receive a written financial plan or written report containing financial planning recommendations in accordance with the terms outlined in the respective agreement. Additional reports will not typically be provided unless otherwise contracted for at the time of engagement. Reports for financial planning clients who have elected to have 79 Financial implement its investment advisory services will be included in the clients' quarterly reports at least twice a year.

Client Meetings – Financial Planning

The nature and frequency of client meetings vary on a case-by-case basis. Meetings for financial planning clients who have elected to have 79 Financial implement its investment advisory services will typically be held congruently with their investment advisory client meetings unless necessary to specifically address changing assumptions.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

At this time, 79 Financial does not pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. 79 Financial will comply with applicable state requirements that relate to registration of Solicitors. To this end, 79 Financial will not engage a Solicitor to solicit clients in any state where such Solicitor is not properly registered. 79 Financial will not engage the services of any Solicitor who is subject to certain disciplinary actions, in accordance with state regulations.

As noted in Item 12 above, 79 Financial receives an economic benefit from Schwab, in the form of the support products and services made available to us and other independent investment advisers whose clients maintain their accounts at Schwab. Clients do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. Clients should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of

interest are described above in Item 12 – Brokerage Practices. 79 Financial may enter into other similar arrangements with other custodians.

ITEM 15. CUSTODY

79 Financial does not accept or maintain physical custody of any client accounts or assets. We do not act as a general partner for a partnership, managing member for a limited liability company, or trustee for a trust in which our advisory clients are either partners of the partnership, members of the limited liability company, or beneficiaries of the trust. Nor does 79 Financial have signatory authority for any client's checking account or have standing letters of authorization in place. Clients are responsible to select qualified custodians to hold funds and securities held in investment accounts managed on their behalf.

Automatic Fee Deduction

79 Financial may, as authorized by clients, direct each client's account custodian to debit from the client's account and pay 79 Financial the investment management fee due from the client. 79 Financial is deemed to have limited custody solely because investment management fees are directly deducted from the client's account by the custodian on behalf of 79 Financial. In connection with this process, we will:

- Initially obtain written authorization from the client permitting 79 Financial's fees to be paid directly from the client's account.
- Communicate with each client's custodian regarding the amount of fee to be paid to 79 Financial on the client's behalf (the "fee invoice").
- Ensure that the independent custodian agrees to send the client, at least quarterly, a statement indicating all amounts disbursed from the account.
- The Firm will deliver a fee invoice to each client for the amount equal to the advisory fee due from the client for payment along with the calculation formula.

Notice to Clients

79 Financial does not anticipate directly opening custodial accounts on behalf of clients, although we will assist clients with account opening paperwork. Nonetheless, if in the future a client requests that the Firm open an account with a qualified custodian on the client's behalf, under the client's name, or under the name of 79 Financial as agent, 79 Financial's policy requires that we notify the client in writing of the qualified custodian's name, address, and the manner in which the funds or securities are maintained, promptly when the account is opened and following any changes to this information.

ITEM 16. INVESTMENT DISCRETION

Clients engage 79 Financial to provide discretionary asset management services. Under such arrangements, we place trades on behalf of a client's account without obtaining the client's consent prior to each trade. Our discretionary authority includes the ability to do the following without client pre-approval:

- Determine the security to buy or sell;
- Determine the amount of the security to buy or sell;
- Determine the broker or dealer to be used for a purchase or sale of securities for a client's account;
- Determine commission rates to be paid to a broker or dealer for a client's securities transactions; and
- When to buy or sell a security or other suitable investment pursuant to investment objectives and guidelines as referenced in the Investment Policy statement (or similar document).

Clients grant us discretionary authority when they sign a discretionary Investment Management Agreement with 79 Financial and may limit this authority by giving us written instructions relative to restricted asset classes, asset types, or specific securities. All such restrictions must be provided to 79 Financial in writing

and will be explicitly referenced in the Investment Management Agreement, Investment Policy statement, or other written instruction. Clients may also change/amend such limitations by providing us with written instructions.

79 Financial does not accept non-discretionary investment management accounts at this time. 79 Financial does not retain discretion over client portfolios under our financial planning service offering.

ITEM 17. VOTING CLIENT SECURITIES

79 Financial, as a matter of policy and practice, has no authority to vote proxies on behalf of advisory clients unless the client has elected in the account paperwork to have a third-party manager or 79 Financial vote proxies. The Firm, if not authorized to vote proxies for a client, may offer assistance as to proxy matters upon a client's request. Furthermore, it is the policy of the Firm to refrain from participating or facilitating any client directed class action suits against securities issuers. Voting proxies involves: (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. Clients who have not assigned authority to vote proxies to a manager or 79 Financial are responsible for instructing each custodian holding such assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

At this time, 79 Financial does not offer any consulting assistance to clients regarding proxy matters.

ITEM 18. FINANCIAL INFORMATION

79 Financial has no additional financial circumstances to report that would impair its ability to meet contractual commitments to clients. Under no circumstances do we require or solicit payment of fees from clients six months or more in advance of services rendered. 79 Financial has not been the subject of any bankruptcy proceedings.

ITEM 19. REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Executive Officer and Management Personnel

Edward G. Jenkins, III is Managing Member, sole owner, and Financial Advisor of 79 Financial. Information regarding the formal education and business background of Mr. Jenkins is provided in his Brochure Supplement.

Other Business Activities

Under this Item, 79 Financial is required to describe any business in which its executive officers and management persons are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business. Mr. Jenkins has no other business activities to report.

Performance-Based Fees

As noted above in Item 6 (Performance-Based Fees and Side-By-Side Management), 79 Financial does not charge performance-based fees for investment management services.

Arbitrations and Regulatory Events

Under this Item, 79 Financial is required to disclose all material facts regarding certain legal or disciplinary

events pertaining to arbitration awards or other civil, regulatory, or administrative proceedings in which 79 Financial or Mr. Jenkins were found liable or against whom an award was granted. 79 Financial and Mr. Jenkins have no reportable disciplinary events to disclose.

Issuer of Securities

Neither 79 Financial nor Mr. Jenkins has any relationship or arrangement with an issuer of securities.

BUSINESS CONTINUITY PLAN SUMMARY

79 Financial has developed a disaster recovery and business continuity plan (the “Plan”), which is focused on the following priorities:

- Safeguarding human life.
- Protecting and preserving confidential client information.
- Minimizing financial loss.
- Ensuring a resumption of operations in the event of a disruption, disaster, or emergency.
- Arranging for the orderly transition of the business in the event of the loss or incapacity of key persons.
- Reviewing the plan as necessary to ensure its efficacy.

Clients are invited to contact Mr. Jenkins at (412) 585-0797 or edjenkins@79financial.com with any questions about our Plan.

PRIVACY NOTICE

We Value Our Relationship

At 79 Financial we value our relationship with you and consider your privacy to be of paramount importance in maintaining that relationship. We are committed to protecting the security and confidentiality of the nonpublic personal information provided to us by our clients. As part of this commitment, 79 Financial has adopted the following privacy policy concerning the collection, maintenance, disclosure, and disposal of our clients' nonpublic personal information.

Collection of Information

As 79 Financial works with you to achieve your investment goals and to effect transactions that you request or authorize, we may collect the following types of information, some of which may be nonpublic and personal in nature: name, address, e-mail, social security number, age, financial status, assets, income, employment status, tax information, retirement and estate plan information, transaction history, account balances, risk tolerance, investment objectives, marital status, family relationships, and banking arrangements.

This information may be collected by 79 Financial via telephone and/or in-person meetings, e-mail, new account documentation and other forms of communication we use to remain current with you. We may also collect information from or about other financial institutions wherein you have relationships and/or have authorized to provide information to us. We collect and maintain this personal information in order to properly serve your investment needs. We consider protecting it a vital part of our job.

Protection and Disposal of Information

79 Financial maintains strict policies for protecting your nonpublic personal and financial information and implements physical, electronic, and procedural safeguards to protect such information. 79 Financial will dispose of records containing a client's personal identifying information utilizing one of the following methods: shredding, destruction of the personal identifying information contained in such records, modification of the records to make the personal identifying information unreadable, or other action consistent with commonly accepted industry practices to safeguard personal information.

Disclosure of Information

We do not disclose any nonpublic personal and financial information about our clients or former clients to anyone except as permitted by law, or as outlined herein. In order to provide investment services and to effect transactions that you request or authorize, we may disclose information about you to the following types of third parties:

If you have asked us to work with another investment adviser, securities broker, or financial institution, we may disclose your nonpublic personal and financial information to any of them, as well as to their service providers or legal representatives. We may disclose your nonpublic personal and financial information to any person acting in a fiduciary or representative capacity on your behalf (such as a trustee of a grantor trust or IRA custodian).

We may use custodians, mailing houses and other third-party businesses to manage your account and provide services to you and may disclose your personal and financial information to these businesses in order to better serve you.

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We may disclose your nonpublic personal and financial information to other non-affiliated third parties as permitted or required by law. For example, we may disclose to law enforcement agencies or computer security consultants for the purpose of protecting against fraud and unauthorized transactions or in order to maintain the confidentiality of our records. We may disclose your nonpublic personal information to our attorneys and accountants.

We may be required to provide information about you and your transactions to governmental agencies, self-regulatory organizations, industry associations and similar bodies in order to fulfill legal and regulatory requirements. In addition, federal and state laws give parties involved in lawsuits and other legal proceedings the right under certain circumstances to obtain information from us, including your personal and financial information. We will comply with these laws to the extent that we are required to do so.

On all occasions when it is necessary for 79 Financial to share your personal information with non-affiliated companies or third parties, we will require that such information only be used for the limited purpose for which it is shared and will advise these companies and/or third parties not to further share such information except to fulfill that limited purpose. We will not sell your personal and financial information to any outside third party. In particular, we do not sell or otherwise disclose our client lists to outside businesses that may try to sell you products and/or services.

Inactive or Former Clients

If a client decides to close their 79 Financial account(s) or becomes an inactive client, we will continue to adhere to our privacy policy and related practices with respect to that client as described in this notice.

Modification of Privacy Policy

We will notify you of our privacy policy annually as required by governing federal and/or state law. We reserve the right to modify this policy at any time, however, and will promptly notify you of any material amendment.

Policy Inquiries

Please direct your questions about this Privacy Notice to Mr. Jenkins at (412) 585-0797 or info@79financial.com.