

Form ADV Part 2A – Firm Brochure

Item 1: Cover Page



Money Positive Cooperative

580 FM3237 Suite B. Wimberley,
TX 78676

206-930-4151

September 25, 2024

This Brochure provides information about the qualifications and business practices of Money Positive Cooperative (“Money Positive”). If you have any questions about the contents of this Brochure, please contact us at (206) 930-4151. 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.

Money Positive Cooperative is registered as an Investment Adviser with the States of Texas, California, New York, Massachusetts, Colorado, and Pennsylvania. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Money Positive is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number (CRD #) 218518.

Item 2: Material Changes

The last annual update of this brochure was on January 27, 2024. The following material changes have occurred to our business since that update:

- Fees are \$200 per month and are not negotiable.
- Fees must be paid in advance.
- The firm has moved to 580 FM3237 Suite B. Wimberley, TX 78676.

Item 3: Table of Contents

Form ADV Part 2A – Firm Brochure	i
Item 1: Cover Page	i
Item 2: Material Changes	ii
Item 3: Table of Contents	ii
Item 4: Advisory Business	1
Item 5: Fees and Compensation	4
Item 6: Performance-Based Fees and Side-By-Side Management	6
Item 7: Types of Clients	6
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss	6
Item 9: Disciplinary Information	9
Item 10: Other Financial Industry Activities and Affiliations	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	9

Item 12: Brokerage Practices
10

Item 13: Review of Accounts
11

Item 14: Client Referrals and Other Compensation
11

Item 15: Custody
11

Item 16: Investment Discretion
11

Item 17: Voting Client Securities
11

Item 18: Financial Information
11

Item 19: Requirements for State-Registered Advisers
12

Form ADV Part 2B – Brochure Supplement
14

Item 4: Advisory Business

Description of Advisory Firm

Money Positive Cooperative is registered as an Investment Adviser in the States of Texas, California, New York, Massachusetts, Colorado, and Pennsylvania.

Member-Owners of Advisory Firm

Money Positive Cooperative is owned by the member-owners of the cooperative listed in the table below.

Full Legal Name	Title or Status	CRD#
Bethke, Kelly	Chief Executive Officer, Chief Compliance Officer	7121686
Griffin, Kimberly	Chief Investment Officer	7978382
Herrmann, Kathryn	Chief Marketing Officer	7121712
Montemayor, Nieves	Chief Financial Officer	4609348
Son, Annie	Member-Owner	7331709

Types of Advisory Services

Comprehensive Financial Planning

Comprehensive Financial Planning involves working one-on-one with a Money Positive planner. By paying a monthly fee, clients get continuous access to a planner who will work with them to design their plan. Typically, comprehensive ongoing financial planning service involves meeting once every two weeks for the first two months of the service, and then a meeting every month moving forward. This schedule is flexible, and meetings may be more frequent. Clients are welcome to book a meeting with their planner ad hoc. The planner will gather necessary client financial information, create a plan proposal for the client based on their goals and current financial status, and meet on an ongoing basis with the client to monitor the plan, recommend any changes, and ensure the plan is up-to-date.

Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning, and estate planning. Once the client's information is reviewed,

their plan will be built and analyzed, and then the findings, analysis, and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. If a follow-up meeting is required, we will meet at the client's convenience. The plan and the client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the client to confirm that any agreed-upon action steps have been carried out. On an as-needed basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Comprehensive financial planning services include topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Comprehensive financial planning is an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. Plans typically include a diagram of the proposed monthly budget and a to-do list of top action items that are discussed during review sessions with the planner and client.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings:** This includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We can provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, longterm care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we can provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Assets Under Management

Money Positive does not provide investment management and therefore does not have Assets Under Management to report.

Item 5: Fees and Compensation

Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without penalty. Please review the fee and compensation information below.

Comprehensive Financial Planning

Comprehensive Financial Planning consists of an ongoing fee that is paid monthly, in advance, through an automatic ACH (Automated Clearing House) payment. There are no pre-paid fees. The first month is prorated. When a business wants us to do planning for their employees, we can bill the employers directly. The fee will be disclosed in the advisory agreement and will vary depending upon the size of the employer.

The rate for clients planning as individuals, couples, or households is \$200 per month for the duration of service.

Table of Fees

Fees Charged by Investment Adviser	Fee Amount	Frequency Fee is Charged	Services
Fixed fees	\$200	Monthly in advance	Comprehensive Financial Planning for Individuals, Couples, or Households

Fees are not negotiable.

The client may terminate the contract with 30 days' written or verbal notice effective the following month. This service can be terminated by Money Positive at any time. After termination by Money Positive, no further charges will be made. Before termination, a client may download their dashboard information directly. If a former client wishes to retrieve their information after termination, we will send a pdf or equivalent copies of their dashboard information within 10 days of receiving notice.

Other Types of Fees and Expenses

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for clients' transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including assetbased sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and SideBy-Side Management

We do not offer performance-based fees; therefore, we do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning services to households of individuals and families. We do not have a minimum account size requirement.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary method of investment analysis is passive investment strategy planning.

Passive Investing

We primarily practice passive investment strategy planning. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investing is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform in the market.

Environmental Social Governance (ESG) and Socially Responsible Investing (SRI)

We offer advice on ESG and SRI investments that meet the above criteria for passive investments while seeking to build portfolios that better align with client values by excluding or including certain industries. For SRI investing, Money Positive currently recommends Betterment SRI funds that focus on climate and social justice. These funds were chosen as they provide an automatically rebalanced, diversified portfolio, with a fee of 0.25% which we consider reasonable. Money Positive does not design custom portfolios.

Material Risks Involved

Money Positive does not provide investment management; however, investment recommendations may be made as part of the financial planning service. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategy is listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds' ("ETF") prices may vary significantly from the Net Asset Value due to market conditions. Certain ETFs may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The adviser has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Neither the firm nor individuals at the firm have any disciplinary information to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Money Positive is not engaged in any other financial industry activities and does not have any affiliations which are otherwise material to the firm's advisory business.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

This Code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We will, upon request, promptly provide a complete Code of Ethics.

A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

Money Positive provides advice only and does not buy or sell for client accounts. Associated persons may trade in any security at any time, as they have no knowledge as to when or what securities are traded for clients.

Money Positive practices a passive investment philosophy as described in Item 8. The funds that are recommended to build passive portfolios are typically commonly available index mutual funds or ETFs.

Additionally, Money Positive requires adherence to its Insider Trading Policy.

Item 12: Brokerage Practices

Factors Used to Recommend Custodians and/or Broker-Dealers

Money Positive Cooperative does not have any affiliation with broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm in alignment with our passive investment philosophy. At the time of this writing, our recommended custodians are Vanguard, Fidelity, and Betterment.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft-dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

As a fee-only financial planner who does not offer investment management services, we do not have a concern over which broker-dealers a client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some Registered Investment Advisers execute client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer investment management services, we do

not execute trades on behalf of clients. As a result, it is up to the client to negotiate their own trading costs with their broker-dealer.

Item 13: Review of Accounts

Financial planners at Money Positive will work with clients to obtain current information regarding their assets and investment holdings and will review this information with clients during scheduled quarterly and/or as requested plan review meetings as part of our financial planning services. Money Positive does not provide specific reports to clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Money Positive does not accept custody of client funds.

Item 16: Investment Discretion

We do not provide investment management services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

Money Positive does not provide investment management services and does not vote client securities. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

Item 18: Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Owners (formal education and business background)

Kelly Bethke

MBA, Sustainable Systems and Social Impact Finance

Money Positive Cooperative

07/2018 – present, Chief Executive Officer, Chief Compliance Officer

Start Up Kids Club

07/2018 – present, Governing Board Member

01/2018 – present, Fractional Chief Operations Officer

Pinchot & Company

2016 – present, Consultant

Fibreolution

08/2015 – present, Consultant

Bethke+Clegg Consulting

09/2012 – present, Partner/Principal

Kate Herrmann

MBA, Business professional and marketing expert

6sense

06/2022 – present, Senior Strategic Customer Success Manager

Money Positive Cooperative

05/2019 – present, Chief Marketing Officer

Nieves Montemayor (“Snow”)

MBA, Finance professional, data analytics and AI expert

Morgan Stanley

02/2023 – present, Consultant

Money Positive Cooperative

11/2022 – present, Chief Financial Officer

Catalyst Advisors LP

01/2022 – 08/2022, Director of Financial Planning and Analysis

01/2016 – 01/2022, Director of Finance and Operations

03/2015 – 01/2016, Manager of Finance

Annie Son

BS, Major in Business Administration, Minor in Social Justice; Series 65; project management

Money Positive Cooperative

01/2024 – present, member-owner

08/2021 – 01/2024, IAR

08/2020 – 08/2021, Money Coach

Straight To Tell

05/2020 – 04/2021, Project Manager Cox

Communications

06/2019 – 05/2020, Project Manager

Performance Based Fees

Money Positive is not compensated by performance-based fees.

Material Disciplinary Disclosures

No owner at Money Positive Cooperative has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have with Issuers of Securities

Neither Money Positive Cooperative, nor any of the owners, have any relationship or arrangement with issuers of securities.

Form ADV Part 2B – Brochure Supplement Kimberly Griffin

Item 1: Cover Page

Money Positive Cooperative

206-930-4151



Financial Advisor

This brochure supplement provides information about Kimberly Griffin that supplements the Money Positive Cooperative (“Money Positive”) brochure. A copy of that brochure precedes this supplement. Please contact Kimberly Griffin if the Money Positive brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kimberly Griffin is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7978382.

Item 2: Educational Background and Business Experience

Kimberly Griffin

Born: 1988

Educational Background

2010 – B A Southwestern University

2017 – MBA St. Edward's University

Business Experience

- 08/2024 – Present, Money Positive Cooperative, Chief Investment Officer, Financial Planner
- 07/2024 – Present, Stakeholders Capital, A Perigon Partner, Investment Researcher
- 03/2024 – Present, Pluralize Capital, Impact Consultant
- 07/2023 – 09/2024, Diversity Richmond, Donation Processor
- 05/2018 – 04/2023, Toniic, Head of Member Operations

Item 3: Disciplinary Information

Kimberly Griffin has no legal or disciplinary events to disclose.

Item 4: Other Business Activities

Kimberly Griffin is an independent contractor for Pluralize Capital where she provides support with file management, investment research, website development, social media, and impact and is an independent contractor for Stakeholders Capital, a Perigon Partner, where she researches private investments that are already in clients' portfolios, focusing on relevant updates since their investment. She does not provide financial or investment advice to either firm.

Item 5: Additional Compensation

Kimberly Griffin receives no additional compensation from non-clients for advisory services.

Item 6: Supervision

Kimberly Griffin is supervised by Kelly Bethke, Chief Compliance Officer. Arianna will abide by and adhere to industry rules and regulations and the firm's written supervisory procedures and Code of Ethics. Kelly may be contacted at the phone number (206-930-4151) on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Kimberly Griffin has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.