

Form CRS Relationship Summary

Dated March 18, 2026

XY Investment Solutions, LLC (hereinafter "XYPN Sapphire") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

XYPN Sapphire (Corporate RIA) Program: We offer discretionary investment management and financial planning services to retail investors through our XYPN Sapphire Program. We monitor your account on an ongoing basis and review your account on at least an annual basis. However, you are encouraged to reach out to us to discuss any changes in your personal or financial situations. In order to effectively manage your investments, you will be required to provide us with discretionary authority. You may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by us. Our advice is not limited to certain types of investments, and we do not offer proprietary products. We do not require a minimum account value to open or maintain an account.

XYPN Sapphire TAMP (Third-party Asset Management): We offer investment management services to retail investors through independent and unaffiliated registered investment advisers (your "Independent Adviser"), to whom we construct and manage discretionary model investment portfolios ("Model Portfolios"). The Model Portfolios are monitored regularly and updated when appropriate. We monitor the Model Portfolios on a continuous basis but do not conduct regular reviews of your specific accounts. You should review Item 13 of your Independent Adviser's Form ADV Part 2A to understand the account review practices and contact them directly if you have any questions. Your Independent Adviser is responsible for choosing the specific Model Portfolio(s) to be implemented in your account(s). In order for us to manage your accounts through your Independent Adviser, you will generally be required to complete a limited power of attorney and/or new account paperwork at the qualified custodian that enables us to implement the Model Portfolio(s) account(s) on behalf of the registered investment adviser with whom you work. We do not offer proprietary products. There are no minimum requirements for retail investors or their registered investment advisers to open or maintain an account or establish a relationship with us. You may be subject to any minimums of your Independent Adviser, if applicable, as disclosed in Item 7 of their Form ADV Part 2A. You may impose reasonable restrictions on our discretionary authority, which must be provided to us in writing and accepted by us.

For Additional Information regarding the services we make available to you, please review [Items 4 and 7 of our Form ADV Part 2A](#), available at <https://adviserinfo.sec.gov/firm/brochure/285967>.

Conversation Starters:

"Given my financial situation, should I choose an investment advisory service? Why or why not?"

"How will you choose investments to recommend to me?"

"What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"

What fees will I pay?

XYPN Sapphire Program: We are compensated for our advisory services by fees charged based on a client's assets under management with us, flat fees, or hourly fees (or a combination thereof). Asset-based fees generally range up to 1.5% per annum, flat fees generally range up to \$60,000 per annum, and hourly fees generally range up to \$750 per hour. Fees are negotiable, and each client's specific fee schedule is included as part of the investment advisory agreement, which will also include details specific to each client, including (i) whether fees are calculated and owed in advance or in arrears, (ii) the frequency of such fees (i.e., monthly or quarterly), (iii) whether fees are deducted automatically from the client's account or whether the client may elect to be billed separately, (iv) the fee calculation methodology (i.e., the last day of a specified period or the average daily balance during a specified period), and (v) whether we will bear the costs of certain services performed by third parties and facilitated by us, such as tax preparation.

XYPN Sapphire TAMP Program: If your Independent Adviser has elected to pass through our advisory fee to you, you as the retail investor will incur an annual asset-based fee that ranges from 0.25% to 0.35% of your Independent Adviser's aggregate assets designated to be under our management. Your Independent Adviser may alternatively elect to pay our advisory fee on your behalf. Fees are automatically deducted from your account(s) pursuant to the fee billing mechanics described in your Independent Adviser's Form ADV Part 2A, Item 5.

In addition to our fees, you may incur additional fees and costs related to the investments in your account, such as your Independent Adviser's fees, custodian fees, transaction costs, internal management fees of mutual funds and ETFs, and other potential product related fees such as redemption fees. Clients may also incur fees for services performed by third parties and facilitated by us, such as tax preparation.

When we charge an asset-based fee, the more assets there are in your account(s), the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account(s) (and to encourage your Independent Adviser to direct more assets to be under our management). When we charge flat fees that are based on the complexity of your financial situation, we are incentivized to add or read-in additional complexity to your financial situation to increase apparent complexity or for the same fee offer fewer or less frequent services than clients paying a higher fee amount. When we charge hourly fees, we are incentivized to incur more time in rendering services to you.

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

More detailed information about our fees and costs may be found in [Item 5 of our Form ADV Part 2A](#).

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Conversation Starter:

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

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

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

The custodian, mutual fund sponsor, and technology solution we recommend provide us or our affiliate with various products and services that are intended to directly benefit you, us, or both of us. To the extent a custodian, mutual fund sponsor, and technology solution provide us or our affiliate products or services that don't directly benefit you, this creates an incentive to recommend that custodian, mutual fund sponsor, and technology solution. To learn how we address this incentive, please refer to [Items 10, 12, and 14 of our ADV Part 2A](#).

Conversation Starter:

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

How do your financial professionals make money?

Our financial professionals who provide direct investment advice to retail investors receive a portion of the fees we obtain from you for the provision of our services. All other financial professionals are compensated on a salary basis and are not paid commissions or other compensation based on the amount of the business generated from their work.

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

No, for the firm. Yes, for financial professionals. You can visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter:

As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional and up-to-date information about our investment management services and request a copy of the relationship summary by visiting <https://www.xypnsapphire.com>, emailing support@xypnsapphire.com, or calling (406) 602-2662.

Conversation Starter:

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

WEBSITE

Xypnsapphire.com

PHONE

406.602.2662

ADDRESS

24 E Main St
Bozeman, MT 5971

Form CRS Relationship Summary

SUMMARY OF MATERIAL CHANGES

We updated Form CRS on March 18, 2026 to indicate the updated phone number, website, and email address of the firm as well as the overall branding shift of XY Investment Solutions, LLC., from XYPN Invest to XYPN Sapphire (corporate RIA) and XYPN Sapphire TAMP (third party asset management program).

Please contact us with any questions or details in connection with any updates discussed above.



(TAMP)

XY Investment Solutions, LLC
24 East Main Street, Bozeman, MT 59715
(406) 602-2662
xypnsapphire.com

ADV PART 2A Firm Brochure

March 11, 2026

Item 1: Cover Page

This brochure provides information about the qualifications and business practices of XY Investment Solutions, LLC, as it relates to its XYPN Sapphire Program. 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. XY Investment Solutions, LLC is a registered investment adviser, but registration does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 406-602-2662 or by emailing support@xypnsapphire.com.

Additional information about XY Investment Solutions, LLC is also available on the SEC's website at www.adviserinfo.sec.gov as well as our disclosures page at xypnsapphire.com/disclosures.

Item 2: Material Changes

In this Item, XY Investment Solutions, LLC is required to identify and discuss material changes since filing its last annual amendment. Since 2024, XY Investment Solutions, LLC has maintained two different brochures, both of which address different business lines. This brochure addresses XYPN Sapphire, the corporate RIA model where individual financial advisors (IARs) choose to affiliate with XYPN Sapphire as their RIA while maintaining ownership of their individual branding as a DBA of XY Investment Solutions, LLC.

Throughout: We updated the naming convention of the Firm. XY Investment Solutions, LLC remains the formal business entity name. The primary branding and DBA under which services are offered are XYPN Sapphire for the corporate RIA, and XYPN Sapphire TAMP for our asset management platform. Prior naming conventions of XYPN Invest, XYIS, etc., may still show as occasional references in other locations as branding is updated. The underlying services remain the same.

Item 4: We updated our description of advisory services to address:

- More clear delineation between the XYPN Sapphire and XYPN Sapphire TAMP platforms and what business each conducts.
- An update regarding the model portfolio program offered by Adviser and the incorporation of third-party model accessibility through Orion.
- The addition of the XYPN Income Plus model portfolio to the XYPN Sapphire managed model list.

Item 8: We added to our Methods of Analysis, Investment Strategies, & Risk of Loss section discussing the limitations we impose on the use of artificial intelligence tools in conjunction with the design of models.

Item 10: We updated our Other Financial Industry Activities & Affiliations in three ways:

- An update to the list of our IARs or associated persons who have other financial industry activities and affiliations.
- An update regarding the model portfolio program offered by Adviser and the incorporation of third-party model accessibility through Orion.
- Additional clarification and disclosure of conflicts regarding Adviser's ownership by XY Planning Network and the impact of sponsors, partners, and affiliates of XY Planning Network.

Item 12: We updated our brokerage practices to address the potential, expanded use of Altruist as a custodial broker-dealer, and the addition of Prometheus as the custodial broker-dealer of our pilot digital asset program; the digital asset pilot program is currently not planned to be offered on the TAMP platform.

Item 15: We updated our Custody information to address the addition of Prometheus as the custodial broker-dealer of our pilot digital asset program. The digital asset program is not planned to be offered on the TAMP platform.

The current version of XY Investment Solutions, LLC's other, Corporate RIA-focused program, can be viewed [here](#).

Item 3:

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Item 4:

Advisory Business

- A. XY Investment Solutions, LLC (the “Adviser,” “Firm,” “we,” “us,” or “our”) is an investment adviser founded in 2016, registered with the U.S. Securities and Exchange Commission (“SEC”) since 2020, and principally owned by XY Planning Network, LLC.

- B. XY Investment Solutions, LLC’s, XYPN Sapphire TAMP brand (in contrast to the XYPN Sapphire more general brand and corporate RIA) operates primarily as a third-party asset management platform for independent RIAs who choose to use our services as a subadvisor for investment management services. The services specified below are specific to XYPN Sapphire TAMP.

- C. XYPN Sapphire TAMP constructs and manages investment models (“Model Portfolios”) through a technology solution. The Model Portfolios can be used by independent registered investment advisers (“RIAs”) that are not affiliated with Adviser. Prior to Adviser rendering investment advisory services, RIAs are required to enter into a written agreement with XYPN Sapphire setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”). The investing clients of RIAs (“Clients”) are required to sign a new account opening form and/or limited power of attorney that authorizes XYPN Sapphire to manage the Model Portfolios into which Clients are invested. RIAs are responsible for assigning Model Portfolios to their Clients.

XYPN Sapphire manages its Model Portfolios on a discretionary basis primarily by allocating Client assets among various mutual funds and exchange-traded funds (“ETFs”). XYPN Sapphire may also allocate Client assets in individual debt and equity securities. While XYPN Sapphire will select mutual funds and ETFs for the Model Portfolios, provide guidance and information about the Model Portfolios to RIAs, RIAs are responsible for choosing the specific model and allocation for each of their Clients.

XYPN Sapphire does not typically tailor its investment management services to meet the needs of each individual Client. As described above, the investments are managed through Model Portfolios. RIAs and their Clients (through their RIAs) can, however, impose reasonable restrictions on investing in certain securities and types of securities if XYPN Sapphire determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to XYPN Sapphire’s management efforts. RIAs are advised to promptly notify XYPN Sapphire if they wish to place any limitations on the management of their Clients’ assets. XYPN Sapphire may work with an RIA to create a custom model portfolio to fit a client’s unique needs, however, the model will be monitored and managed by the RIA.

- D. XYPN Sapphire currently offers the following Model Portfolios for RIAs to choose for Clients:

- i. XYPN Core — Globally diversified portfolio consisting of ETFs
- ii. XYPN Core with DFA — Globally diversified portfolio consisting of mostly ETFs*
- iii. XYPN Kick Start — Globally diversified portfolio consisting of 3 mutual funds, intended for smaller and growing accounts
- iv. XYPN Tracker — Globally diversified portfolio consisting of ETFs
- v. XYPN Income Plus — Globally diversified fixed income focus portfolio that incorporates bonds and income and dividend-paying assets through ETFs
- vi. All DFA — Globally diversified portfolio consisting of mostly mutual funds and all DFA*
- vii. Cause — Globally diversified portfolio consisting of ETFs that incorporate socially responsible investing principles
- viii. BRI — Globally diversified portfolio consisting of ETFs and Mutual funds that incorporate biblically responsible investing principles

E. In addition to the Firm's proprietary Model Portfolios, XYPN Sapphire TAMP provides RIAs with access to a "Model Portfolio Marketplace" featuring investment strategies designed by independent, third-party sub-advisers. The initial offering of third-party models will be BlackRock with others added over the course of the year. While these third-party strategists are responsible for the design and ongoing updates of their respective models, XYPN Sapphire maintains discretionary authority to implement these models, including trade execution and rebalancing, for Client accounts. RIAs remain solely responsible for determining the suitability of any marketplace model for their individual Clients.

F. Adviser does not participate in any wrap fee programs.

G. When XYPN Sapphire TAMP provides discretionary investment management services to retirement plans or individual retirement accounts ("Retirement Accounts"), it is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code (the "Code"). Unlike the Firm's direct advisory services (with XYPN Sapphire, non-TAMP), XYPN Sapphire TAMP serves in a limited fiduciary capacity as a discretionary sub-advisor or model manager. In this role, the Firm's fiduciary duty is limited to the discretionary management of the assets within the Model Portfolios. The independent Registered Investment Adviser ("RIA")—and not XYPN Sapphire—is responsible for the following:

- i. Determining the suitability of the Model Portfolios for the plan or its participants.
- ii. Providing individualized investment advice or financial planning to plan sponsors or participants.
- iii. Selecting the specific model and asset allocation for the Client.

XYPN Sapphire TAMP does not provide participant-level education, individualized planning, or 3(21) advisory services to the plan sponsor under this Program.

H. Adviser manages the following amount of discretionary and non-discretionary client assets calculated as of 12/31/2026.

Corporate RIA Assets:

i.	Discretionary:	\$ 686,791,888
ii.	Non-Discretionary:	\$ 666,464
iii.	Total:	\$ 687,458,352

TAMP Assets:

i.	Discretionary:	\$ 194,045,429
ii.	Non-Discretionary:	\$ 0
iii.	Total:	\$ 194,045,429

Item 5: Fees and Compensation

A. XYPN Sapphire offers investment management services for an annual fee (also referred to as “management fee”) based on the total amount of each RIA’s assets under XYPN Sapphire’s management according to a cliff fee schedule. Once an RIA hits the breakpoint, all assets under management are charged at the new breakpoint fee in accordance with the following fee schedule. This fee schedule is available to RIAs who are current members of the XY Planning Network. The fee for clients of XYPN Sapphire who terminate their membership with XY Planning Network will increase by 5 bps to their current breakpoint tier starting on the beginning billing period following their membership termination date with XY Planning Network.

FROM \$0 TO \$5,000,000	0.35%
FROM \$5,000,001 TO \$25,000,000	0.30%
ABOVE \$25,000,000	0.25%

The annual fee is prorated based on the start date of when assets are transferred to XYPN Sapphire’s platform for management and charged using the same fee billing methodology that is utilized by the RIA to whom XYPN Sapphire provides its services. In other words, the XYPN Sapphire management fee may be billed in advance or arrears, monthly or quarterly, or using period-end value or average daily value over the applicable billing period, depending on the specific fee billing methodology utilized by the RIA to whom XYPN Sapphire provides its services. In the event the Advisory Agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding portion of the fee is charged to the client, as appropriate.

XYPN Sapphire and its supervised persons do not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

- B. XYPN Sapphire may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and pro bono activities.
- C. For RIAs that have elected to pay XYPN Sapphire’s management fee directly, XYPN Sapphire will remit the RIA’s advisory fee deducted on the RIA’s behalf net of the applicable XYPN Sapphire management fee. For RIAs that have elected to have their Clients pay for the XYPN Sapphire management fee directly, XYPN Sapphire will automatically deduct both the RIA’s

advisory fee and the XYPN Sapphire management fee from such Clients' accounts pursuant to such Clients' written authorization.

- D. The Financial Institution (as defined below) that acts as the qualified custodian for Client accounts, from which XYPN Sapphire retains the authority to directly deduct fees, has agreed to send statements to Clients at least quarterly detailing all account transactions, including any amounts paid to XYPN Sapphire.

- E. In addition to the advisory fees paid to XYPN Sapphire, Clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), 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. XYPN Sapphire's brokerage practices are described at length in Item 12, below.

- F. Clients can make additions to and withdrawals from their account at any time. Additions can be in cash or securities provided that XYPN Sapphire reserves the right to liquidate any transferred securities or declines to accept particular securities into a Client's account. Clients can withdraw account assets (preferably upon notice to XYPN Sapphire), subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. XYPN Sapphire may consult with its RIAs and their Clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Item 6:

**Performance-Based Fees &
Side-By-Side Management**

Neither Adviser nor any of its supervised persons accepts performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client). Neither Adviser nor any of its supervised persons engage in side-by-side management.

Item 7:

Types of Clients

XYPN Sapphire offers services to RIAs that will use the Model Portfolios for their Clients, which will include individuals as well as high net worth individuals, trusts, estates, charitable organizations, corporations, and business entities.

XYPN Sapphire does not have any requirements, such as a minimum account size, to open and maintain an account.

Item 8:

Methods of Analysis, Investment Strategies, & Risk of Loss

- A. The investment strategies used by Adviser for managing assets include long-term investment strategies incorporating the principles of Modern Portfolio Theory, and the investment philosophy is designed for investors who desire a “buy and hold” strategy. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance does not guarantee future returns.
- B. Like any investment strategy, Modern Portfolio Theory involves material risks. Such material risks are described in further detail below:
- i. Investing for the long term means that a client’s account will be exposed to short-term fluctuations in the market and the behavioral impulse to make trading decisions based on such short-term market fluctuations. Adviser does not condone short-term trading in an attempt to “time” the market, and instead coaches clients to remain committed to their financial goals. However, investing for the long term can expose clients to risks borne out of changes to interest rates, inflation, general economic conditions, market cycles, geopolitical shifts, and regulatory changes.
 - ii. Inflation risk is the risk that the value of a client’s portfolio will not appreciate at least in an amount equal to inflation over time. General micro- and macro-economic conditions may also affect the value of the securities held in a client’s portfolio, and general economic downturns can trigger corresponding losses across various asset classes and security types. Market cycles may cause overall volatility and fluctuations in a portfolio’s value, and may increase the likelihood that securities are purchased when values are comparatively high and/or that securities are sold when values are comparatively low. Geopolitical shifts may result in market uncertainty, lowered expected returns, and general volatility in both domestic and international securities. Regulatory changes may have a negative impact on capital formation and increase the costs of doing business, and therefore result in decreased corporate profits and corresponding market values of securities.
 - iii. Investing in mutual funds does not guarantee a return on investment, and shareholders of a mutual fund may lose the principal that they’ve invested into a particular mutual fund. Mutual funds invest into underlying securities that comprise the mutual fund, and as such clients are exposed to the risks arising from such underlying securities. Mutual funds charge internal expenses to their shareholders (which can include management fees, administration fees, shareholder servicing fees, sales loads, redemption fees, and other fund fees and expenses, e.g.), and such internal expenses subtract from its potential for market appreciation. Shares of mutual funds may only be traded at their stated net asset value (“NAV”), calculated at

the end of each day upon the market's close.

Investing in exchange traded funds ("ETFs") bears similar risks and incurs similar costs to investing in mutual funds as described above. However, shares of an ETF may be traded like stocks on the open market and are not redeemable at an NAV. As such, the value of an ETF may fluctuate throughout the day and investors will be subject to the cost associated with the bid-ask spread (the difference between the price a buyer is willing to pay (bid) for an ETF and the seller's offering (asking) price).

Clients are encouraged to carefully read the prospectus of any mutual fund or ETF to be purchased for investment to obtain a full understanding of its respective risks and costs.

- iv. Investing in common stocks means that a client will be subject to the risks of the overall market as well as risks associated with the particular company or companies whose stock is owned. These risks can include, for example, changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. Common stocks tend to be more volatile and more risky than certain other forms of investments, especially as compared to fixed income products like bonds.
 - v. Investing in bonds means that a client will be subject to the market prices of such debt securities, which typically fluctuate depending on interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and rise when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk. Bonds are also subject to inflation risk, reinvestment risk, redemption risk, and valuation risk.
 - vi. Investing in REITs means that clients will be subject to the risks associated with investments in mortgages and their related activities in addition to the general risk of equity and financial markets. Among the factors that the REIT industry is vulnerable to are: (1) change in government regulation, primarily the pass-through tax treatment of REIT income, (2) the market for residential mortgage assets, (3) the general level and term structure for interest rates. The common equity prices of REITs have historically been more closely correlated with changes in interest rates than other non-REIT equity securities. Additionally, REITs tend to be more illiquid in nature, may contain additional fees, and may experience disruptions in distributions in comparison to other types of securities.
- C. When XYPN Sapphire aids an RIA in the management of a Client portfolio and recommended asset allocation, XYPN Sapphire relies on an analysis of the Client's financial objectives, current and estimated future resources, and tolerance for risk based on the information provided by the RIA. To derive a recommended asset allocation, XYPN Sapphire may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with

any other methods used to make projections into the future, there are several risks associated with this method, which may result in the Client not being able to achieve their financial goals. They include:

1. The risk that expected future cash flows will not match those used in the analysis
 2. The risk that future rates of return will fall short of the estimates used in the simulation
 3. The risk that inflation will exceed the estimates used in the simulation
 4. For taxable Clients, the risk that tax rates will be higher than was assumed in the analysis
- D. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance does not guarantee future returns.

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds, e.g.), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs used by XYPN Sapphire may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include those of any size market capitalization. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in XYPN Sapphire 's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds and emerging markets funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds used by XYPN Sapphire may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

Investing in mutual funds does not guarantee a return on investment, and shareholders of a mutual fund may lose the principal that they've invested into a particular mutual fund. Mutual funds invest into underlying securities that comprise the mutual fund, and as such clients are exposed to the risks arising from such underlying securities. Mutual funds charge internal expenses to their shareholders (which can include management fees, administration fees, shareholder servicing fees, sales loads, redemption fees, and other fund fees and expenses, e.g.), and such internal expenses subtract from its potential for market

appreciation. Shares of mutual funds may only be traded at their stated net asset value ("NAV"), calculated at the end of each day upon the market's close.

Investing in ETFs bears similar risks and incurs similar costs to investing in mutual funds as described above. However, shares of an ETF may be traded like stocks on the open market and are not redeemable at an NAV. As such, the value of an ETF may fluctuate throughout the day and investors will be subject to the cost associated with the bid-ask spread (the difference between the price a buyer is willing to pay (bid) for an ETF and the seller's offering (asking) price).

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

- E. Although AI tools may be utilized to identify potential risks, opportunities, or strategies for a model or allocation, at no point does Adviser rely on such a tool for determining a model or allocation. Any AI, LLM, or similar tool utilized by means of a preapproved technology tool will only be used in conjunction and coordination with appropriate expertise, diligence, and prudent application.

AI tools do not take the place of an experienced and knowledgeable professional but can be used in aid of a professional in determining a prudent course of action. If any tool is used in a significant or substantial way—other than incidentally—such output will be appropriately and adequately documented by Adviser's representative.

Item 9:
Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Adviser's advisory business or the integrity of Adviser's management.

Item 10:

Other Financial Industry Activities & Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

No XYPN Sapphire employee is registered or has an application pending to register as a broker-dealer or as a registered representative of a broker-dealer.

No XYPN Sapphire employee is registered or has an application pending to register as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Though certain Investment Adviser Representatives of Adviser are licensed insurance agents, they do not offer insurance products and do not receive insurance product commissions in connection with their association with Adviser. Representatives are prohibited from selling insurance products or receiving insurance commissions or referral incentives.

A. Affiliation with other investment advisers:

- i. Michael E. Kitces, indirect owner of Adviser, has relationships with another investment adviser. He is Head of Planning Strategy and an Investment Adviser Representative of Focus Partners Wealth, LLC.
- ii. IARs Associated with other Firms on a Temporary Basis
 - i. Anton Madsen is associated with Stone Steps Financial, LLC., an SEC registered investment adviser. Mr. Madsen is transitioning his existing clients from XYPN Sapphire to his new firm affiliation at Stone Steps Financial, but the process is still ongoing. Once transitioned, Mr. Madsen's affiliation with XYPN Sapphire will be terminated.
 - ii. Mario Pizzamiglio is associated with Ardent Guardian Wealth Advisory, LLC. This is the RIA that he has established and will be transitioning his existing clients from XYPN Sapphire to his new firm affiliation pending final administrative and regulatory filings. Once transitioned, Mr. Pizzamiglio's affiliation with XYPN Sapphire will be terminated.
- iii. IARs Associated with other Firms on an Ongoing Basis
 - i. Derek Merkler is also affiliated with Nectarine Financial, Inc. as an investment adviser representative. Nectarine is not affiliated with XYPN Sapphire. Please refer to Item 14 for more information about the referral arrangement received by Nectarine in connection with their platform referring clients to Derek Merkler.

- ii. Other Investment Adviser Representatives have the opportunity to utilize Nectarine for referral purposes, but currently no others participate in such an arrangement.

A conflict of interest exists to the extent that Adviser or its Supervised Persons recommends these other investment advisers to clients or where those other investment advisers recommend their clients use Adviser's services. In order to mitigate these conflicts, Adviser does not allow such cross referrals.

B. XYPN Sapphire (corporate RIA):

XYPN Sapphire maintains a separate brochure that covers its XYPN Sapphire Corporate RIA program. XYPN Sapphire offers an affiliation model to independent fee-only financial planners that can become investment adviser representatives ("Independent IARs") under the XYPN Sapphire program of the Firm. Such Independent IARs provide investment and financial planning advice to their clients while utilizing the XYPN Sapphire program's investment management tools, technology, custodian relationships, back office support, and compliance management. For further information about the XYPN Sapphire Corporate RIA program, please refer to xypnsapphire.com or its separate brochure: adviserinfo.sec.gov/firm/brochure/285967.

C. XY Planning Network, Inc. ("XYPN"):

XYPN Sapphire is a wholly-owned subsidiary of XY Planning Network. XYPN is a community-driven advisor support network of more than one thousand financial advisors that provides tools, resources, and services, to enable financial advisors to start, run, and grow their own fee-only financial planning practices serving Gen X and Gen Y clients for a monthly subscription fee. XYPN connects consumers with our diverse community of fee-only CFPs dedicated to bringing real financial planning to the next generation without regard to investment account minimums.

To the extent a member of XYPN purchases a subscription to Orion Advisor Tech (an RIA-centric software service provided by Orion Advisor Solutions, Inc. ("Orion")) directly through Orion instead of through XYPN Sapphire, Orion will generally share a portion of the revenue it receives from such subscription with XYPN Sapphire. From time to time, Orion will also sponsor events and conferences hosted by XYPN and pay or reimburse travel expenses associated with attending Orion events and conferences. These arrangements create a financial incentive to recommend Orion to clients, which presents a conflict of interest. XYPN Sapphire addresses this conflict of interest by disclosing it in this brochure, by advising clients that they are under no obligation to subscribe to the Orion, whether through XYPN Sapphire or directly with Orion, and by only continuing to utilize Orion if believed to be in the best interests of clients.

Item 11:

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

- A. The information provided in Item 11 applies to XYPN Sapphire's (including the TAMP) supervised persons. Independent RIAs that utilize the TAMP platform are not supervised persons of XYPN Sapphire and likely have their own distinct Code of Ethics that should be available to the public upon request. XYPN Sapphire recommends that members of the public should request this information from their RIA to learn more about the practices of their adviser.

- B. XYPN Sapphire has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. Adviser's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by Adviser or any of its Supervised Persons and the trading by the same of securities ahead of Clients in order to take advantage of pending orders.

The Code of Ethics requires Adviser's personnel to report their personal securities holdings and transactions and either prohibits or requires obtaining pre-approval of certain investments (e.g., initial public offerings, limited offerings).

- C. Associates of Adviser may buy or sell securities similar to, or different from, those recommended to Clients for their accounts if done in a fair and equitable manner that is consistent with Adviser's policies and procedures. Though this is a conflict of interest, as Adviser or its IARs may benefit from an increase in price from subsequent purchases by clients, this Code of Ethics has been established recognizing that Adviser mainly recommends mutual funds and ETFs, securities that trade in sufficiently broad markets and can be completed without appreciable impact on the markets of such securities.

- D. Associates of Adviser may buy or sell securities for themselves at or around the same time as Clients.

When Adviser is engaging in or considering a transaction in any security on behalf of a Client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- a. the transaction has been completed;
- b. the transaction for the Supervised Person is completed as part of a batch trade with Clients; or
- c. a decision has been made not to engage in the transaction for the Client.

These requirements are not applicable to:

- a. direct obligations of the Government of the United States;
 - b. money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements;
 - c. shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.
- E. Neither Adviser, its associates or any related person is authorized to recommend to a Client, or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.
- F. Clients and prospective Clients may contact Adviser to request a copy of its Code of Ethics.

Item 12:

Brokerage Practices

- A. Adviser considers several factors when recommending a custodial broker-dealer for client transactions and determining the reasonableness of such custodial broker-dealer's compensation. Such factors include the custodial broker-dealer's industry reputation and financial stability, service quality and responsiveness, execution price, speed and accuracy, reporting abilities, and general expertise. Assessing these factors as a whole allows Adviser to fulfill its duty to seek best execution for its clients' securities transactions. However, Adviser does not guarantee that the custodial broker-dealer recommended for client transactions will necessarily provide the best possible price, as price is not the sole factor considered when seeking best execution. After considering the factors above, Adviser recommends Charles Schwab & Company, Inc. ("Schwab") as the custodial broker-dealer for client accounts.
- i. Adviser does not receive research and other soft dollar benefits in connection with client securities transactions, which are known as "soft dollar benefits". However, the custodial broker-dealer(s) recommended by Adviser do provide certain products and services that are intended to directly benefit Adviser, clients, or both. Such products and services include (a) an online platform through which Adviser can monitor and review client accounts, (b) access to proprietary technology that allows for order entry, (c) duplicate statements for client accounts and confirmations for client transactions, (d) invitations to the custodial broker-dealer(s)' educational conferences, (e) practice management consulting, (f) discounts on compliance, marketing, research, technology, and practice management products or services provided to Adviser by third party vendors, and (g) occasional business meals and entertainment.
 - ii. Schwab has also historically sponsored the national conference hosted by XYPN, and has directly paid third-party technology, research, marketing, compliance, and consulting-related expenses that would otherwise be borne directly by XYPN. Schwab retains the authority to continue such conference sponsorship and third-party vendor expense reimbursement, and XYPN may therefore continue to receive such benefits from Schwab in the future.
 - iii. Schwab also provides access to its investment adviser platform to XYPN member advisers regardless of the assets managed or placed on Adviser's platform. There is no direct link between Adviser's participation in Schwab's institutional customer program and the investment advice it gives to its clients, although Adviser Sapphire receives economic benefits through its participation in the program that are typically not available to Schwab retail investors.
- B. The receipt of these products and services creates a conflict of interest to the extent it causes Adviser to recommend Schwab as opposed to a comparable custodial broker-dealer.

Adviser addresses this conflict of interest by fully disclosing it in this brochure, evaluating Schwab based on the value and quality of its services as realized by clients, and by periodically evaluating alternative broker-dealers to recommend.

- C. Adviser does not consider, in selecting or recommending custodial broker-dealers, whether Adviser or a related person receives client referrals from a custodial broker-dealer or third-party.
- D. Adviser does not routinely recommend, request, or require that a client direct Adviser to execute transactions through a specified custodial broker-dealer other than Schwab.
- E. Adviser retains the ability to aggregate the purchase and sale of securities for clients' accounts with the goal of seeking more efficient execution and more consistent results across accounts. Aggregated trading instructions will not be placed if it would result in increased administrative and other costs, custodial burdens, or other disadvantages. If client trades are aggregated by Adviser, such aggregation will be done so as not to disadvantage any client and to treat all clients as fairly and equally as possible.
- F. In addition to Schwab, Adviser also utilizes Altruist Financial LLC as a custodial broker-dealer for client accounts. Adviser does not currently offer Altruist as a custodial option for TAMP clients but is evaluating its use and may offer it as a custodial broker-dealer option at a later time.
- G. The TAMP is not currently, nor is it planned to be, a participant for the pilot Digital Asset program. For Adviser's pilot digital asset program, Adviser recommends Prometheus Capital LLC. Prometheus was selected because of its unique position in the market as an SEC-registered and FINRA-member Special Purpose Broker-Dealer that adheres to SEA Rule 15c3-3 (the Customer Protection Rule). This framework requires the strict segregation of client assets and robust internal controls specifically designed for the digital asset environment.

Item 13:

Review of Accounts

- A. Adviser monitors the Model Portfolios on a continuous basis but does not conduct regular reviews of the RIA's Client accounts. Model Portfolio reviews are conducted by Adviser's personnel.

- B. Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied.

- C. Clients also receive written or electronic reports from XYPN Sapphire and/or an outside service provider on a quarterly basis, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from Adviser or an outside service provider.

Item 14:

Client Referrals and Other Compensation

- A. No one other than clients provide an economic benefit to Adviser for providing investment advice or other advisory services to clients. However, as described above in Item 12, the custodial broker-dealer(s) recommended for client accounts provides certain products and services that are intended to directly benefit Adviser, clients, or both. Orion also provides certain compensation and other benefits to Adviser as described above in Item 10.
- B. Adviser may directly or indirectly compensate a person who is not Adviser's supervised person for client referrals as a result of a referral arrangement that enables one or more of our supervised persons to participate in the referral arrangement described here: Adviser has entered into a contractual relationship with Nectarine Financial, Inc. ("Nectarine"), an independent and unaffiliated investment adviser registered with the U.S. Securities and Exchange Commission that operates an interactive website platform (the "Platform"), to receive prospective client referrals through the Platform. If a prospective client referred to Adviser engages one of our supervised persons to provide financial planning or other investment advisory services through the Platform, such client will pay Adviser's fee to Nectarine through the Platform. Nectarine will remit a portion of this fee to Adviser and retain the balance of this fee in consideration of Nectarine's referral services. Adviser's fee is not increased as a result of Nectarine's referral services. Prospective clients referred to Adviser through the Platform will receive a separate written disclosure that details the fee payment arrangement between Nectarine and Adviser. Nectarine does not otherwise provide any investment advisory or financial planning services to prospective clients, as such services are directly provided by Adviser through its relationship with Nectarine and the Platform.
- C. Dimensional Fund Advisors, LP ("DFA") has historically sponsored the national conference hosted by XYPN, and DFA retains the authority to continue such conference sponsorship in the future. Certain client investment portfolios include mutual funds and ETFs sponsored and managed by DFA. This creates a conflict of interest to the extent DFA's sponsorship of XYPN's national conference causes Adviser to include DFA mutual funds and ETFs in its investment portfolios, or to otherwise recommend DFA mutual funds or ETFs to its clients. Adviser addresses this conflict of interest by fully disclosing it in this brochure, and by only making investment portfolio allocation decisions and recommendations without regard for any benefits conferred by DFA.

Item 15: Custody

For clients that do not have their fees deducted directly from their account(s), and have not provided Adviser with any standing letters of authorization (“SLOAs”) to distribute funds from their account(s) to third parties, Adviser will not have any custody of client funds or securities.

For clients that have their fees deducted directly from their account(s), or that have provided Adviser with discretion as to amount and timing of disbursements pursuant to an SLOA to disburse funds from their account(s) to third parties, Adviser will generally be deemed to have custody over such clients’ funds pursuant to applicable custody rules and guidance thereto. At no time will Adviser accept custody of client funds or securities in the capacity of a custodial broker-dealer or other qualified custodian, and at all times client accounts will be held by a third-party qualified custodian as described in Item 12, above.

With respect to custody that is triggered by third party SLOAs, Adviser endeavors to comply with the following seven conditions as listed in the 2017 SEC No Action Letter to the Investment Adviser Association:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client’s qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

If a client receives account statements from both the custodial broker-dealer and Adviser or a third-party report provider, client is urged to compare such account statements and advise Adviser of any discrepancies between them.

Item 16:

Investment Discretion

Adviser is given the authority to exercise discretion within the Model Portfolios on behalf of Clients. Adviser is considered to exercise investment discretion over a Client's account if it can effect and/or direct transactions in Client accounts without first seeking their consent. Adviser is given this authority through a new account opening form and/or limited power-of-attorney included in the agreement between Adviser and the Client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). XYPN Sapphire takes discretion over the following activities:

- A. The securities to be purchased or sold;
- B. The amount of securities to be purchased or sold; and
- C. When transactions are made.

Item 17:

Voting Client Securities

- A. At present Adviser does not have and will not accept authority to vote client securities.

- B. Clients will receive their proxies or other solicitations directly from their custodial broker-dealer or a transfer agent, as applicable, and should direct any inquiries regarding such proxies or other solicitations directly to the sender.

Item 18:

Financial Information

- A. Adviser does not require or solicit prepayment of fees six months or more in advance.
- B. Adviser has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.
- C. Adviser has not been the subject of a bankruptcy petition at any time during the past ten years.

FACTS	WHAT DOES XY INVESTMENT SOLUTIONS, LLC DO WITH YOUR FINANCIAL INFORMATION?																												
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.																												
What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Financial account balances and assets ▪ Transaction history 																												
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons XY Investment Solutions, LLC chooses to share; and whether you can limit this sharing.																												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Reasons we can share your personal information</th> <th style="width: 25%; text-align: center;">Does XY Investment Solutions, LLC share?</th> <th style="width: 25%; text-align: center;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td>For our everyday business purposes: such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our marketing purposes: to offer our products and services to you</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For joint marketing with other financial companies</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td>For our affiliates' everyday business purposes: information about your engagement, experiences, and assets</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our affiliates' everyday business purposes: information about your creditworthiness</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td>For our non-affiliated persons who are contracted with us, for everyday business purposes: <i>Arrangements with companies or independent contractors not affiliated with XY Investment Solutions, LLC</i></td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our affiliates to market to you</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">[-]</td> </tr> <tr> <td>For non-affiliates to market to you</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> </tbody> </table>			Reasons we can share your personal information	Does XY Investment Solutions, LLC share?	Can you limit this sharing?	For our everyday business purposes: such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	For our marketing purposes: to offer our products and services to you	Yes	No	For joint marketing with other financial companies	No	Not Applicable	For our affiliates' everyday business purposes: information about your engagement, experiences, and assets	Yes	No	For our affiliates' everyday business purposes: information about your creditworthiness	No	Not Applicable	For our non-affiliated persons who are contracted with us, for everyday business purposes: <i>Arrangements with companies or independent contractors not affiliated with XY Investment Solutions, LLC</i>	Yes	No	For our affiliates to market to you	Yes	[-]	For non-affiliates to market to you	No	Not Applicable
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For non-affiliates to market to you	No	Not Applicable																											
To limit our sharing	<p>Call (360) 301-7579 or go to xyplanningnetwork.com/invest</p> <p>Please note: If you are a <i>new</i> client, we can begin sharing your information 10 days from the date we sent this notice. When you are <i>no longer our client</i>, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>																												
Questions?	Call (360) 301-7579 or go to xyplanningnetwork.com/invest																												

Privacy Policy Notice

Who we are	
Who is providing this notice?	XY Investment Solutions, LLC
What we do	
How does XY Investment Solutions, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building, as well as other physical, electronic, and procedural safeguards.
How does XY Investment Solutions, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Sign an investment advisory agreement ▪ Seek advice about your investments ▪ Tell us about your investment or retirement portfolio or earnings <p>We also collect your personal information from our affiliates.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes - information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ XY Planning Network, Inc. ▪ AdvicePay ▪ Kitces.com ▪ fpPathfinder ▪ New Planner Recruiting
Non-Affiliates	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do not share with non-affiliates so they can market to you
Joint marketing	We do not jointly market to you.
Other Important Information	
<p>XY Investment Solutions, LLC may also share your personal information with a successor advisor if necessary in connection with the unexpected death or incapacity of its principal owner(s), as well as in connection with the eventual retirement or other change in control of the firm.</p>	