Firm Brochure (Part 2A of Form ADV)

Item 1 - Cover Page

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This brochure provides information about the qualifications and business practices of Ascend Investment Management, LLC If you have any questions about the contents of this brochure, or would like a free copy, please contact us at 801-598-6957 or by email at info@ascendmanagement.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Ascend Investment Management, LLC is a registered investment adviser. Registration with the SEC or any state securities authority does not imply a certain level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Ascend Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Material Changes:

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

This brochure contains changes made with the addition of the relationship with AssetMark Platform along with changes to the fee structure reflected below in Item 5. These changes include: (i) an increase in the first asset management fee breakpoint from $100,000 to $250,000; (ii) the addition of a separate fee schedule for accounts directly managed by Ascend Investment Management, LLC at Charles Schwab & Co., Inc.; (iii) disclosure of the general fee range for the AssetMark Platform and the treatment of managed strategies that fall outside that range; (iv) a wrap fee program disclosure; and (v) clarification that fee schedule changes apply to new accounts opened after the date of this brochure, with existing clients receiving an updated brochure and a new or amended advisory agreement before any change to their fee structure takes effect. This brochure also contains updated disclosure in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss, describing AIM, LLC's investment strategies separately for AssetMark Platform accounts and accounts custodied at Charles Schwab & Co., Inc., and clarifying the risks associated with the Firm's investment strategies and the types of securities recommended. This brochure also adds disclosure in Items 4, 5, 8, and 10 describing AIM, LLC's renewed advisory relationship with Jackson National Life Insurance Company's RIA platform, including the applicable advisory fee. This brochure also adds disclosure in Items 4, 5, and 8 describing AIM, LLC's advisory services with respect to a participant account held in an employer-sponsored 401(k) plan record kept through ADP's retirement services platform, including the applicable advisory fee.

Full Brochure Availability

The complete copy of our Firm Brochure is available by contacting Ascend Investment Management, LLC at 801-598-6957 or via email at: info@ascendmanagement.com

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Item 4- Advisory Business:

Ascend Investment Management, LLC (hereinafter "Ascend Investment Management, LLC", "AIM, LLC", "Advisor", "Adviser", or "Firm") is a limited liability company under the laws of the State of Utah and was founded in 2020 and registered as an investment advisor in May 2020, Tyler S Olson is 100% owner.

Ascend Investment Management, LLC provides personalized confidential financial planning and investment management services to individuals, trusts, estates, 401(k)'s, pension and profit-sharing plans, charitable organizations, corporations or other business entities. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, estate planning, and mortgage analysis.

Ascend Investment Management, LLC, is a fee-based investment advisory firm. The firm itself does not sell fixed index annuities and other insurance products for a commission. The firm's managing member has an affiliated business, Ascend Life Insurance, LLC, through which insurance products may be recommended and sold for a commission. Ascend Investment Management, LLC doesn't act as a custodian of client assets.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis.

Portfolio Management Services

Ascend Investment Management, LLC offers discretionary and non-discretionary direct asset management services to advisory clients. The Advisor primarily seeks to manage client accounts on a discretionary basis.

The firm will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis and appropriate investment will be recommended based the client's individual objectives and needs. Periodic reviews are also communicated to provide reminders of the specific course of action that need to be taken. Investment accounts will typically consist of one or more of stocks, bonds, mutual funds, exchange traded funds ("ETF's"). Given that the market will affect the value of these securities, the Advisor will monitor client accounts daily so that it may make any necessary transactions in discretionary accounts. Advisor can also customize the portfolio investments based on specific client needs and feedback.

Ascend Investment Management, LLC does not provide any "wrap programs" (programs that bundle brokerage and advisory services under a single comprehensive fee) so all securities recommended by Ascend Investment Management, LLC may include additional transaction charges by the client's broker-dealer/custodian separate from the Firm's advisory fees.

Discretionary Portfolio Management

The client will grant Ascend Investment Management, LLC limited trading authority (discretionary authority) in the client's brokerage account by executing the appropriate documents with the client's broker-dealer/custodian. The discretionary authority will allow Ascend Investment Management, LLC to enter securities transactions on the client's behalf, determining which securities and the amount of securities to buy or sell. Clients will be notified of all transactions by trade confirmation from their broker-dealer/custodian and through communications with the Firm.

Ascend Investment Management, LLC will also request the client to provide authorization to allow the Advisor to

automatically deduct its advisory fee from the client's account (more detail discussed in the "Fees and Compensation" section of this brochure); however, the Advisor will not have the authority to make any other withdrawals from the client's account(s) under management, except to facilitate a withdrawal to the client's address of record or directly linked bank account that is established by the client with the broker-dealer/custodian for the purpose of fund transfers to or from the client's account.

Non-discretionary Portfolio Management

Non-discretionary direct asset management relationships are rarely accepted by the Advisor. These relationships would be engaged on a case-by-case basis in order to provide occasional assistance to clients who wish to make their own investment selections in regards to timing, price, and quantity to be bought or sold and are seeking assistance from the Advisor to execute those transactions on their behalf. Because Advisor will rely on explicit instructions to make changes in the investments in client's account, there could be some delay in the execution of a trade. Client will provide prior authorization for Advisor to be able to execute trades in client's account at the inception of the account with the custodian and advisory relationship. Ascend Investment Management, LLC will engage in non-discretionary relationships after determining, in its sole discretion and in writing, whether it is willing to undertake the desired involvement the client is seeking.

Subadvisor

Adviser may offer advisory services to Clients by selecting the AssetMark Platform. For more information regarding the AssetMark Platform, refer to AssetMark Platform Brochure.

The minimum investment required on the AssetMark Platform depends upon the investment solution chosen for a Client's account and is determined by AssetMark. Current investment minimums are described in more detail in the Fees and Minimums Page in the AssetMark Platform or Referral Disclosure Brochure. Accounts below the stated minimums may be accepted on an individual basis and the discretion of AssetMark.

Within the AssetMark Platform, Advisor selects from among the investment strategies and strategists made available on the Platform for the purpose of offering appropriate portfolio management styles to its clients. The payment of applicable strategy and strategist fees is outlined in Item 5.

When selecting a strategy or strategist available on the AssetMark Platform for management of account assets, the client's best interest will be the determining factor of Ascend Investment Management, LLC. Considerations for the selection of a strategy or strategist include, but are not limited to, client's investment amount, investment objectives, other investments (held with AIM, LLC and otherwise), tax considerations, etc., where the investment model(s) would, in the Advisor's opinion, be the best suited execution of the client's objectives.

All communication, reporting, and account servicing requests are fulfilled through Ascend Investment Management, LLC. AssetMark and its strategists accept instruction from Ascend Investment Management, LLC as to which investment model strategies to allocate client's funds. Ascend Investment Management, LLC does not direct, nor have input, in the underlying investments within a strategist's models. AssetMark and its strategists are granted discretionary trading authorization for the accounts assigned to them in the fulfilling of the custodian's account forms. AIM, LLC has the discretion to direct a change in which model client funds are in (e.g., move between mutual fund, ETF, equity models, etc.), or to remove a strategy or strategist, at its sole discretion, from a client's account.

Strategists made available on the AssetMark Platform are vetted by AssetMark. The intent to utilize the AssetMark Platform, and the strategies or strategists selected, will be disclosed to the client in writing, by means of fulfilling the necessary account forms with the custodian, prior to the commencement of the services. Unless otherwise indicated as a restriction, client's signature within the Investment Advisory Agreement shall serve as acceptance of the use of the AssetMark Platform.

Jackson National Life RIA Platform

AIM, LLC also provides advisory services with respect to variable and fixed indexed annuity contracts issued by Jackson National Life Insurance Company ("Jackson") through the registered investment adviser ("RIA") side of Jackson's platform, for an asset-based advisory fee in lieu of a commission-based arrangement. The fee applicable to Jackson RIA platform accounts is outlined in Item 5. AIM, LLC's use of the Jackson RIA platform will be disclosed to the client in writing prior to the client's engagement of this service.

ADP 401(k) Platform

AIM, LLC also provides advisory services to a participant in an employer-sponsored 401(k) plan recordkept through ADP's retirement services platform. For this account, AIM, LLC's services are limited to the investment allocation and selection among the investment options made available under the plan for the applicable participant. The fee applicable to this account is outlined in Item 5.

Financial Planning and Consulting

If financial planning services are applicable, Ascend Investment Management, LLC will conduct a discovery interview with the client. The discovery interview will include, but is not limited to, a thorough review of topics including Income, Living Expenses, Insurance, Education Planning, Social Security Analysis, Retirement Income Planning, Mortgage Analysis, Wills, and Estate Plan/Trusts. The delivered plan will consist of a printed plan that provides a snapshot of the client's current scenario (based off of the information provided to Advisor by client), a recapture of the client's objectives within each of topics, as applicable, and a written strategy and recommendation for reaching the stated objectives. Financial planning services are performed on an hourly fee basis described in detail under the Fees and Compensation section of this brochure,

Seminars

Ascend Investment Management, LLC holds seminars to educate the public, free of charge, on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

Client Assets Under Management

As of July 30, 2026, firm assets under management were approximately $3,102,138, of which none were non-discretionary.

Item 5- Fees and Compensation:

Methods of Compensation and Fee Schedule:

The fee schedules described in this Item 5 are effective as of the date of this brochure and apply to new advisory accounts opened on or after that date. For existing clients, any change to the fee structure applicable to their account will not take effect until the client has been provided a copy of this updated brochure and has executed a new or amended investment advisory agreement reflecting the revised fee schedule.

Asset Management

Ascend Investment Management, LLC offers discretionary and non-discretionary asset management services to advisory clients. Ascend Investment Management, LLC will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

The following schedule is based on a tiered fee basis. Platform fees are in addition to AIM, LLC's fees and are disclosed prior to account opening. Fees for these services will be based on a percentage of assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First $250,000	1.25%	0.31%*
Over $250,001 but less than $1,000,000	1.00%	0.25%
Over $1,000,001 but less than $5,000,000	0.75%	0.19%
Over $5,000,001	0.50%	0.13%

*The minimum quarterly fee is $25

The annual fee may be negotiable depending on the types of investments and degree of involvement required for client's circumstances. Friends, family, representatives of Ascend Investment Management, LLC, and certain charitable organizations may be given a discounted fee at the sole discretion of Ascend Investment Management, LLC. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the average daily balance of assets being managed. Accounts that enter management at some point other than the start of a quarter will have advisory fees prorated for that quarter. Quarterly advisory fees are typically deducted directly from the client's account by the custodian or may be paid by the client to Ascend Investment Management, LLC within ten (10) days following the end of the quarter being billed. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) days of signing the Investment Advisory Agreement without incurring any fees. Clients may terminate advisory services at any time without penalty; however, as a matter of courtesy, Advisor requests prior notice of intent to terminate services. Ascend Investment Management, LLC will be entitled to a pro rata fee for the days service was provided in the final quarter. The fee for accounts that are established at any other time than the first day of the quarter will be prorated based on the number of days during the quarter the assets were under management. Client shall be given thirty (30) days prior written notice of any increase in fees.

Charles Schwab Direct-Managed Accounts

In addition to accounts managed on the AssetMark Platform, Ascend Investment Management, LLC directly manages accounts custodied at Charles Schwab & Co., Inc. through the selection of individual stocks, bonds, and exchange traded funds (ETFs), rather than through an AssetMark Platform strategy. Fees for these directly managed accounts are based on a tiered percentage of assets under management, as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First $250,000	1.75%	0.44%*
Over $250,001 but less than $1,000,000	1.50%	0.38%
Over $1,000,001 but less than $5,000,000	1.25%	0.31%
Over $5,000,001	1.00%	0.25%

*The minimum quarterly fee is $25

Fees for Charles Schwab direct-managed accounts are billed and negotiated on the same terms described above for asset management accounts generally (quarterly, in advance, based on average daily balance, subject to the same negotiability, proration, termination, and notice provisions).

Jackson National Life RIA Platform Accounts

For client assets held in a variable or fixed indexed annuity contract managed through the RIA platform of Jackson National Life Insurance Company ("Jackson"), AIM, LLC's annual advisory fee is 1.50% of assets under management. This fee may be negotiable, at AIM, LLC's discretion, to a lower rate under the same general circumstances described above under Asset Management. Unlike the other fee arrangements described in this Item 5, the advisory fee for Jackson RIA platform accounts is calculated and deducted directly by Jackson from the annuity contract, and the applicable amount is then remitted by

Jackson to AIM, LLC. Clients should also refer to the applicable annuity contract and prospectus for information about fees, charges, and terms imposed by Jackson that are separate from and in addition to AIM, LLC's advisory fee.

ADP 401(k) Platform Accounts

For the participant account described in Item 4 held in an employer-sponsored 401(k) plan record kept through ADP's retirement services platform, AIM, LLC's annual advisory fee is 1.50% of assets under management. As with Jackson RIA platform accounts, this fee is calculated and deducted directly by ADP, and the applicable amount is then remitted by ADP to AIM, LLC.

For fees deducted from the client's account at the custodian, Ascend Investment Management, LLC will:

- Provide the client an invoice summarizing the amount of the fee being deducted via client's customer portal, however, client may request to have the statements sent to them via direct mail,
- Obtain written authorization signed by the client to allow the fees to be deducted; and,
- The custodian will provide a quarterly statement directly to the client which will disclose the fees deducted.

Subadvisor/Platform Fees:

Fees and compensation for using the AssetMark Platform, are provided in more detail in the AssetMark Platform or Referral Disclosure Brochure. Fees and Investment Minimums schedules are included AssetMark's Platform or Referral Disclosure Brochure and the Client Billing Authorization will also state the fee applicable to your account.

The fees applicable to each Account on the AssetMark Platform will include:

1. Financial Advisor Fee,
2. AssetMark's Platform Fee, which includes any Strategist or Manager Fee, as applicable, and most custody fees. The Platform Fee Schedules for the various Investment Solutions are listed in the Fees & Minimum table, at the end of AssetMark's Platform or Referral Disclosure Brochure.

AssetMark's Platform Fee, which includes any applicable Strategist or Manager Fee, generally ranges as follows:

Investment Solution	Platform/Strategist/Manager Fee
General range across Investment Solutions	0.45% – 0.65%

Certain managed strategies fall outside of this general range. Where applicable, the specific fee for such a strategy will be disclosed to the client prior to the client's opening of an account utilizing that strategy, and will be documented in a separate fee disclosure signed by the client at the time the strategy is selected.
Other fees for special services may also be charged. The Client should consider all applicable fees.

The fee for use of a Subadvisor is charged in addition to AIM, LLC's fee and are disclosed prior to strategy selection and account opening. Lower fees for comparable services may be available from other sources
.
Client fees are payable quarterly, in advance, based on assets under management. Clients may terminate AssetMark accounts at any time and receive a full pro-rata refund of any unearned fees.

Financial Planning and Consulting

Prior to starting the planning process the client is provided an estimate of the total cost of the financial plan. The estimate is based upon information provided by the client during the discovery process and the estimate may be changed if additional undisclosed or unexpected items require unforeseen implementation into the plan.

Payments for in depth financial plans are due upon delivery of the plan. Client may terminate the Agreement within five (5) business days of signing the agreement. If the client terminates after five (5) business days, but before delivery or completion, Advisor is due a pro-rata fee based on the hours of work completed. If a client should cancel the financial planning agreement under which any plan is being created, the client shall be billed for actual hours logged on the planning project.

Financial Planning Services are offered based on an hourly fee of $150 per hour. If hourly services extend past the number of hours estimated and agreed upon by the client, the client must agree by signing an amended agreement or addendum to the agreement to include the additional hours to complete.

The written financial plan will be presented within six (6) months of the contract date, although typically within a month, provided that all information needed to prepare the financial plan has been promptly provided by the client

Additional Fees Charged

Broker dealer/Custodians may charge platform fees and/or transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds (ETFs). These charges may include mutual fund transaction fees, postage and handling, and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Wrap Fee Program Disclosure

Ascend Investment Management, LLC does not sponsor or offer a wrap fee program (a program in which a single, all-inclusive fee covers both advisory services and brokerage/transaction execution costs). Accordingly, the advisory fees described above do not include brokerage commissions, transaction charges, custodial fees, or other charges imposed by the client's broker-dealer/custodian, which are billed separately from AIM, LLC's advisory fee as described above and in Item 12 – Brokerage Practices. Because these costs are not bundled into a single fee, AIM, LLC's compensation is not reduced by, nor otherwise tied to, the volume or frequency of transactions in a client's account.

External Compensation for the Sale of Securities to Clients

Ascend Investment Management, LLC does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Ascend Investment Management, LLC.

Other Compensation

In the review process of a client's financial objectives, representatives of Ascend Investment Management, LLC may also, in their capacity of an independent agent of one or more insurance providers, recommend non-securities products (e.g., life insurance policies, indexed annuities, etc.). While Ascend Investment Management, LLC receives no commission from the sale of these types of products, its representatives may. This represents a conflict of interest. AIM, LLC requires the disclosure of this conflict by its representatives prior to the recommendation and sale of any of these products. Clients are not obligated to purchase insurance products through representatives of AIM, LLC and may choose to purchase through an agent of their choosing at client's sole discretion. This is separate and distinct from AIM, LLC's advisory services provided with respect to variable and fixed indexed annuity contracts through the RIA platform of Jackson National Life Insurance Company, described in Item 4 and Item 5, which are provided for an asset-based advisory fee rather than a commission.

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

Ascend Investment Management, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7- Types of Clients:

Ascend Investment Management, LLC provides investment advice and advisory services primarily to individuals. We also work with small businesses, 401(k)'s, pensions, trusts, charitable organizations, and corporations. Client relationships vary in scope and length of service.

Ascend Investment Management, LLC does not have a required minimum account size to open or maintain an advisor relationship. However, smaller accounts (accounts with less than $5,000) managed by Ascend Investment Management, LLC may find their performance negatively impacted by other account fees and/or transaction costs. Therefore, these clients should consider all other options for investing prior to establishing a managed account with Ascend Investment Management, LLC.

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

Methods of Analysis

Ascend Investment Management, LLC ("AIM, LLC") may use a combination of technical and fundamental methods to assess risks and opportunities in capital markets when managing client assets. Investing in securities involves risk of loss, including the potential loss of principal, that clients should be prepared to bear.

AIM, LLC's investment selection process is informed by the Advisor's own investment analysis and judgment, together with third-party research, data, and analytical tools that AIM, LLC determines are appropriate from time to time. AIM, LLC may update or change the specific research resources it relies on without updating this brochure, provided the general nature of its analysis remains as described here.

In developing a financial plan for a client, AIM, LLC's analysis may include cash flow analysis, investment planning, social security planning, and estate planning. Based on the information gathered, a strategy tailored to the client's specific situation is developed.

Investment Strategy — AssetMark Platform Accounts

For accounts custodied on the AssetMark Platform, AIM, LLC designs each client's portfolio by selecting from among the investment strategies made available on the AssetMark Platform, which span a range of risk tolerances and investment objectives. AIM, LLC has discretion to select the strategy or combination of strategies used for a client's account and to change the strategies selected, and the percentage of account assets allocated to each, at any time based on AIM, LLC's assessment of the client's objectives and market conditions. The specific strategies and objective ranges offered on the AssetMark Platform are determined by AssetMark and may change from time to time; current offerings are described in the AssetMark Platform or Referral Disclosure Brochure.

Investment Strategy — Schwab Custodied Accounts

For accounts custodied at Charles Schwab & Co., Inc., AIM, LLC directly selects the individual securities, funds, and other investments held in the account, based on the Advisor's own investment analysis and discretion. Schwab-custodied accounts are generally structured either (i) as accounts held through the brokerage window made available under a client's employer-sponsored retirement plan (e.g., a Personal Choice Retirement Account, or "PCRA®"), which AIM, LLC manages on the client's behalf, or (ii) as accounts designed to pursue a more actively managed investment approach, in which AIM, LLC may adjust a portfolio's holdings and market exposure over time based on its ongoing assessment of market and economic conditions.

Neither AIM, LLC nor its subadvisors utilizes leveraged or inverse ETFs in constructing portfolios.

Investment Strategy — Jackson National Life RIA Platform Accounts

AIM, LLC also provides advisory services with respect to variable and fixed indexed annuity contracts issued by Jackson National Life Insurance Company ("Jackson") through the registered investment adviser ("RIA") side of Jackson's platform, in lieu of a commission-based arrangement. For these accounts, AIM, LLC selects among the investment subaccounts and investment options made available within the applicable Jackson annuity contract, consistent with the client's investment objectives. AIM, LLC's use of the Jackson RIA platform will be disclosed to the client in writing prior to the client's engagement of this service.

Investment Strategy — ADP 401(k) Platform Accounts

For the account described in Item 4 held in an employer-sponsored 401(k) plan record kept through ADP's retirement services platform, AIM, LLC's services are limited to selecting and allocating among the investment options made available under the plan for the applicable participant, consistent with the participant's investment objectives.

Risk Factors

- **General Investment Risk.** All investing involves risk of loss, including the possible loss of the entire amount invested, and clients should be prepared to bear that risk. Past performance of any strategy is not a guarantee of future results.
- **Discretionary Selection Risk.** AIM, LLC exercises discretion in selecting AssetMark strategies, individual securities, and account allocations, and in adjusting them over time. The success of this approach depends on AIM, LLC's judgment, and there is no guarantee that AIM, LLC's selections or adjustments will achieve a client's investment objectives or outperform alternative approaches.
- **Concentration Risk.** Depending on the strategies or securities selected for an account, a portfolio may at times be concentrated in a limited number of securities, sectors, or strategies. A concentrated portfolio is not diversified to the same degree as a broad-market index and may experience greater volatility, or underperform, relative to the market as a whole, as a result.
- **Active/Dynamic Management Risk.** For accounts managed using a more actively managed approach, AIM, LLC may adjust portfolio exposure based on its assessment of market and economic conditions. This approach carries the risk that AIM, LLC's assessment proves incorrect, or that an adjustment occurs too early or too late, which could cause a client to miss part of a market advance or remain exposed during a decline, and may result in additional transaction costs, including more frequent trading than a strictly buy-and-hold strategy, which can increase brokerage costs, transaction costs, and taxes.
- **Strategy/Model Risk.** For accounts invested through AssetMark Platform strategies, the performance of an account depends in part on the design and execution of the underlying strategy by AssetMark or its strategists, which AIM, LLC does not control directly.
- **Employer-Sponsored Retirement Plan Risk.** Accounts held through an employer-sponsored retirement plan, whether through a brokerage window or the plan's designated investment menu, are subject to the rules, limitations, and investment options made available by the client's plan and its recordkeeper, in addition to the risks generally described in this Item 8.
- **Individual Stock Risk.** Investment in individual stocks carries additional risk relative to a diversified fund, as an individual stock's performance is not offset by the performance of a broad basket of other holdings, and could result in significant losses.
- **ETF and Mutual Fund Risk.** ETFs and mutual funds are subject to management, tracking, and liquidity risk, and their performance may not exactly match the index or strategy they are designed to track.
- **Annuity Risk.** For accounts invested through a variable or fixed indexed annuity contract on the Jackson RIA platform, investment or allocation options are limited to the subaccounts, index strategies, or other options made available within that contract, and clients should also consider the fees, surrender charges, and other terms of the

underlying annuity contract, which are separate from and in addition to AIM, LLC's advisory fee.

Item 9- Disciplinary Information:

Neither Ascend Investment Management, LLC nor any of its related persons (including management and IA Reps) have had any legal or disciplinary events in their past. Clients and prospective Clients can always view the CRD records (registration records) for Ascend Investment Management or any of its IA Reps through the SEC's Investment Adviser Public Disclosure (IAPD) website at ***www.adviserinfo.sec.gov*** or through FINRA's BrokerCheck database online at ***www.finra.org/brokercheck*** if the IA Reps is also a broker-dealer agent. The CRD number for Ascend Investment Management, LLC is 307989 and the CRD number for management and IA Reps are listed alongside their biographical information in the accompanying BROCHURE SUPPLEMENT document.

Item 10- Other Financial Industry Activities and Affiliations:

Neither Ascend Investment Management, LLC nor any of its management persons are registered representatives of a broker-dealer. Nor do they have any relationship or arrangements with a broker-dealer, municipal securities dealer, or government securities dealer or broker; and investment company or other pooled investment vehicle (e.g. mutual fund, private fund, etc.); another investment adviser or financial planner; a futures commission merchant, commodity pool operator, or commodity trading advisor; a banking or thrift institution; an accountant or accounting firm; a lawyer or law firm; a pension consultant; a real estate broker or dealer; or sponsor or syndicator of limited partnerships.

Associated persons of Ascend Investment Management, LLC may also be insurance agents with appointments with one or more insurance companies. In these cases, agents act as an independent insurance agent and activities include the sales and service of insurance products (e.g. life insurance, fixed and indexed annuities). These practices represent a conflict of interest because it gives an incentive to recommend products based on the commissions received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent or contractor of their choosing.

From time to time, Ascend Investment Management, LLC may utilize strategies or strategists made available on the AssetMark Platform to manage clients' investment portfolios. In these circumstances, client accounts are established with the custodian with Ascend Investment Management, LLC as the primary listed adviser, and AssetMark and its strategists implement the applicable strategy pursuant to the AssetMark Platform documentation. At the discretion of AIM, LLC, a client's account can be removed from a given strategy or strategist, and except for executing trades within the selected strategy, all account servicing is maintained by AIM, LLC. AssetMark and its strategists maintain the models or investment strategies to which Ascend Investment Management, LLC assigns for an account. As outlined in Item 5 of this brochure, the billing of advisory fees and payment of applicable strategy and strategist fees is the responsibility of AIM, LLC.

Ascend Investment Management, LLC, in its sole discretion, selects the strategies and strategists it utilizes on the AssetMark Platform for client accounts. Past performance, strategy availability (i.e., tax efficient strategies, ETF only strategies, equity only strategies, etc.), industry credibility and reputation, research and information sharing capabilities, proper industry registration, etc., are considerations that we take into account in this selection.

The practice of utilizing strategies and strategists on the AssetMark Platform represents a conflict of interest, as Ascend Investment Management, LLC may select strategies or strategists that carry a lower fee than other available options. This conflict is mitigated by disclosures, procedures, and by the fact that Ascend Investment Management, LLC has a fiduciary duty to place the best interests of the client first and will adhere to its code of ethics. Aside from the assignment of client assets to a strategy or strategist on the AssetMark Platform, Ascend Investment Management, LLC does not have any other business relationship with the strategists it utilizes and does not receive any additional incentive in the selection of a particular strategy or strategist. This allows us to ensure that there are no conflicts of interest in the continued management of our

clients' accounts to stay with a strategy that we determine to be under-performing or if, in our opinion, a strategy that is more in line with our clients' interests presents itself for consideration.

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

Code of Ethics Description

The employees of Ascend Investment Management, LLC have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Ascend Investment Management, LLC employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Ascend Investment Management, LLC. The Code reflects Ascend Investment Management, LLC and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. Employees are not allowed to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict wit the benefit to our clients.

Ascend Investment Management, LLC's policy prohibits any person from acting upon, or otherwise misusing, non-public or inside information. No advisory representative or other employee, officer, or director or Ascend Investment Management, LLC may recommend any transaction in a security or it derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Ascend Investment Management, LLC's Code is based on the guiding principal that the interests of the client are our top priority. Ascend Investment Management, LLC's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access persons". "Access persons" are employees who have access to non-public information regarding any clients purchase or sale of securities, or non- public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

Ascend Investment Management, LLC will provide a copy of the Code of Ethics to any client or perspective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Ascend Investment Management, LLC and its employees do not recommend to clients securities in which we have a material financial interest.

Advisory Firm Purchase of the Same Securities Recommended to Clients and Conflicts of Interest

Ascend Investment Management, LLC and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as "trading ahead", employees are required to disclose all reportable securities transactions as well as provide the Firm with copies of their brokerage statements.

The Chief Compliance Officer of Ascend Investment Management, LLC is Tyler S. Olson. He reviews all employee trades quarterly. The personal trading reviews addresses that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and

Conflicts of Interest

Ascend Investment Management, LLC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflict of interest exists.

Item 12 - Brokerage Practices:

Ascend Investment Management, LLC brokerage accounts may utilize various custodians for our client accounts. AIM, LLC does not have the discretionary authority to determine the broker-dealer to be used. We reserve the right to decline acceptance of any client account for which the client directs the use of a broker-dealer if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of a broker-dealer, it should be understood that AIM, LLC may not have the ability to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients (who may direct the use of another broker-dealer).

For clients in need of brokerage services, and depending on client circumstances and needs, we may recommend the use of one of several brokers provided that such recommendation is consistent with our firm's fiduciary duty to the client. AIM, LLC evaluates recommended broker-dealers and will only recommend those it believes will provide our clients with a blend of execution services, commission costs, and professionalism that will assist our firm to meet our fiduciary obligations to clients. Our clients must evaluate these brokers before opening an account. AIM, LLC does not receive client referrals from a broker-dealer or third party that would incentivize the recommendation of one custodian over another. The factors considered by AIM, LLC when making these recommendations are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to effect trades through any recommended broker. Clients should note, while AIM, LLC has a reasonable belief that the broker-dealers we recommend are able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers.

Additionally, by recommending such broker-dealers, AIM, LLC may also receive non-cash consideration that may include a higher level of service from these organizations, industry reports, economic forecasts that would only be used in the management of client accounts. Some investment companies may provide marketing support to Ascend Investment Management, LLC and/or its representatives, which may be either monetary or non-monetary in value. While the representatives of Ascend Investment Management, LLC endeavor at all times to put the interest of the clients first, and as part of the Firm's fiduciary duty to its clients does not take any of these benefits into consideration for making a recommendation to clients, clients should be aware that the receipt of additional support and assistance itself creates a potential conflict of interest.

Trade Aggregation

Ascend Investment Management, LLC recommends Charles Schwab & Co., Inc. Advisor Services.

Ascend Investment Management, LLC will primarily rely on the custodian for the execution of brokerage transactions and does not have the discretion to direct trades to specific brokers. As such, clients may not receive the lowest price possible if they were to have their trades directed to specific brokers. Where possible AIM, LLC submits trades as block trades. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in the block.

Block trading allows us to execute equity trades in a timelier, more equitable manner, at an average share price across the block. AIM, LLC's block trading policy and procedures are as follows:

1. Transaction for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Ascend Investment Management, LLC, or the firm's order allocation policy.

2. The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
3. The portfolio manager must reasonably believe that the order aggregation will benefit, and will enable AIM, LLC to seek the best execution for each client account in the aggregation order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of hindsight perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
4. Prior to entry of an aggregated order, an order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
5. If the order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated pro-rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro-rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
6. Generally, each client account that participates in the aggregation order must do so at the average price for all separate transactions made to fill the order, and must share in the commissions on a pro-rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.
7. If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
8. Ascend Investment Management, LLC's client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold, for that account.
9. Funds and securities for aggregated orders are clearly identified on AIM, LLC's records and to the broker-dealer handling the transactions, by the appropriate account numbers for each participating client.
10. No client or account will be favored over another.

Ascend Investment Management, LLC does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Item 13 - Review of Accounts:

While the underlying investment accounts are continually monitored (whether the investments are managed by a subadvisor or by AIM, LLC), accounts are also reviewed on a quarterly basis in conjunction with calculating management fees. Reviews consist of an examination of account performance against the investment policy established for each client. More frequent reviews may be performed due to the client's individual circumstances, economic conditions, general factors affecting the stock market, etc. Clients will receive transaction confirmations, quarterly statements, and other details inserted or mailed from the account custodian (physically or electronically). AIM, LLC may also provide account reports as contracted for at the inception of the advisory relationship. Such reports may include the amount of fee, the value of the client's assets upon which the fee was based, and the way the fee was calculated. Clients are urged to carefully review statements and compare to official custodial records to the statement provided by AIM, LLC. Advisor statements may vary from custodial statements based on account procedures, reporting dates, or valuation methodologies of certain securities. AIM, LLC may also generate reports through various third-party software providers.

In addition to the quarterly statements provided by AIM, LLC and the custodian, Advisor strives to meet with each of its clients individually, at least on an annual basis. During these meetings, a review of client's investment objectives, personal circumstances, and account performance are reviewed. Clients are not limited to one review per year and may request additional meetings or correspondence. Advisor will strive to make accommodations as may be reasonable.

Clients engaging in financial planning services will receive a one-time printed financial plan containing the details of their plan, as outline above.

Item 14 - Client Referrals and Other Compensation:

Ascend Investment Management, LLC does not pay any outside solicitor fees to refer investors to the firm. However, representatives and/or managers of the firm may be insurance agents or brokers for one or more insurance companies. As such, in their separate capacity as insurance agents or brokers, will be able to affect transactions (i.e., life insurance, indexed annuity) for clients, for which they may receive separate compensation.

As noted above, clients are not obligated to purchase any product or service from representatives of AIM, LLC. However, clients should be aware that the receipt of additional compensation from the outside business activities of AIM, LLC representatives creates a potential for a conflict of interest. However, through its obligation to clients and a fiduciary and through its supervisory process, AIM, LLC will make every effort to disclose and prevent this conflict from affecting the judgment of these individuals when making recommendations.

Item 15 - Custody:

Ascend Investment Management, LLC is considered to have custody of client funds or securities solely because of the direct withdrawal of its advisory fees. However, no client money resides at Ascend Investment Management, LLC. Furthermore, we do not perform the accounting functions, including the transaction confirmations and monthly statements. The custodians provide account statements directly to the clients at their address of record at least quarterly. Ascend Investment Management, LLC clients are encouraged to carefully review all statements and other reports from the custodian which show transactions, balances, account activity, fee payments, commissions incurred, etc. Ascend Investment Management, LLC provides quarterly summary reports outlining fee amount, value fee was based off (as outlined in Item 13) that may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion:

Ascend Investment Management, LLC receives discretionary authority from the client at the outset of an advisory relationship via a Managed Account and Service Agreement. This agreement allows AIM, LLC to select the identity, timing, and amount of securities to be bought or sold. Ascend Investment Management, LLC observes the investment policies, limitations and restrictions of the individual clients for which it advises. For registered investment companies, Ascend Investment Management, LLC's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

When a subadvisor is used, the subadvisor receives discretionary authority to execute trades in the client's account through the completion of the custodian's account forms. The custodian requires this additional authorization by the client prior to the assignment for each individual account.

The client approves the custodian to be used and the commission rates paid to the custodian. Ascend Investment Management, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades. Clients may establish investment guidelines and/or restrictions on Ascend Investment Management, LLC's authority by written agreement.

Item 17 - Voting Client Securities:

Ascend Investment Management, LLC does not assume any authority to, and does not vote proxies on behalf of, advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios received directly from their account custodian. However, Clients may request advice to clients regarding the clients' voting of proxies.

Item 18 - Financial Information:

Balance Sheet

A balance sheet is not required to be provided because Ascend Investment Management, LLC does not serve as a custodian for client funds or securities and Ascend Investment Management, LLC does not require prepayment of fees of more than $500 per client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Ascend Investment Management, LLC has no condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

Bankruptcy Petitions During the Past Ten Years

Neither Ascend Investment Management, LLC nor its managers have had any bankruptcy petitions in the last ten years.

Item 19 – Requirements for State Registered Advisors:

Ascend Investment Management, LLC's principal executive officer is Tyler Olson. Mr. Olson's biographical information is given on the attached *BROCHURE SUPPLEMENT* document.

Under the "Fees and Compensation" section of this Firm Brochure, the subsection titled *"Other Compensation"* explains that IA Reps of Ascend Investment Management, LLC may also be licensed as insurance agents and may receive insurance commissions for the sale of insurance products. This activity and the conflicts of interest associated with it are discussed at greater length in the *"Other Compensation"* subsection of this Firm Brochure.

Ascend Investment Management, LLC would be required to disclose additional information if it: were to charge performance-based fees; had any other relationship or arrangement with any issuer of securities; or was ever found liable in either: a) an arbitration, or b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Ascend Investment Management, LLC, its management persons, or IA Reps, Ascend Investment Management, LLC has no information to disclose in these regards.

Part 2B of Form ADV
Brochure Supplement

July 2025

Tyler S. Olson
2379 N 1560 W
Pleasant Grove, UT 84062
(801) 598-6957 – Direct
www.ascendmanagement.com
tyler@ascendmanagement.com

This brochure supplement provides information about Tyler Olson that supplements the Ascend Investment Management, LLC brochure. Please contact Tyler S Olson, Compliance Officer, at (801)598-6957 if you did not receive Ascend Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the above listed individuals is available on the SEC's website at *www.adviserinfo.sec.gov*

Educational Background and Business Experience

Form ADV Part 2B, Item 2

TYLER OLSON (CRD#4273188)

Year of Birth: 1978

Post-Secondary Education:

- University of Phoenix, BA Accounting (2007)
- University of Phoenix, Masters of Business Administration (2009)
- University of Phoenix, Masters in Accounting (2012)

Material Business Experience:

- Ascend Investment Management, LLC., Owner/Representative, 02-2020 - Current
- Ascend Life Insurance, LLC., Owner/Agent, 02/2020 – Current
- InsureRight Insurance Agency, Agent, 07/2025 – Current
- Lone Peak Advisers, Inc., Investment Advisor Representative, 08/2018 – 02/2020
- Legacy Planning Group, Inc., Investment Advisor Representative, 12/2017 – 08/2018
- H. Beck, Inc., Registered Representative, 12/2017 – 06/2018
- Transamerica Financial Advisors, Investment Advisor Representative, 03/2017 – 12/2017
- Transamerica Financial Advisors, Registered Representative, 06/2013- 12/2017
- World Financial Group, 07/2011- 12/2017

Disciplinary Information

Form ADV Part 2B, Item 3

Tyler Olson has not had any legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Tyler Olson through the SEC's Investment Adviser Disclosure (IAPD) website at ***www.adviserinfo.sec.gov*** or FINRA's BrokerCheck database online at ***www.finra.org/brokercheck.*** The CRD number for Tyler Olson is 4273188.

Other Business Activities

Form ADV Part 2B, Item 4

Tyler S. Olson is the sole owner in Ascend Management Holdings, LLC. Although Ascend Management Holdings, LLC does not offer any financial services products, it is the 100% owner of Ascend Life Insurance, LLC., through which Mr. Olson offers insurance and annuity sales. Tyler also has an agent relationship with InsureRight Insurance Agency where he may solicit auto, home, business, and life insurance contracts. Tyler Olson could receive a fee and/or commissions where he would have a material financial interest. From time to time, he may offer clients advice or products from those activities. These

practices represent a conflict of interest because it gives an incentive to recommend products based on the commission or fees received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent or contractor of their choosing.

Additional Compensation

Form ADV Part 2B, Item 5

Aside from the sales commissions earned by Mr. Olson for his outside business activities described in the "Other Business Activities" section above, Mr. Olson does not receive any additional compensation from non-clients for providing advisory services. For more details, see Item 10 of the Form ADV Part 2A.

Supervision

Form ADV Part 2B, Item 6

Mr. Olson is the sole owner of Ascend Investment Management, LLC; therefore, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Requirements for State-Registered Advisors

Form ADV Part 2B, Item 7

Ascend Investment Management, LLC would be required to disclose additional information for Mr. Olson if he had ever been the subject of a bankruptcy petition or ever been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceeding. Mr. Olson was the subject of a Ch 7 Bankruptcy, which was discharged in 2007. Ascend Investment Management, LLC has no additional information to disclose in this regard.

Part 2B of Form ADV
Brochure Supplement

May 2026

Christian Z Cardoso CFP®
4946 W Gallatin Way
Highland, UT 84003
(801) 505-2234 - Direct
www.ascendmanagement.com
christian@ascendmanagement.com

This brochure supplement provides information about Christian Z Cardoso CFP® that supplements the Ascend Investment Management, LLC brochure. Please contact Tyler S Olson, Compliance Officer, at (801) 598-6957 if you did not receive Ascend Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the above listed individuals is available on the SEC's website at *www.adviserinfo.sec.gov*

Educational Background and Business Experience

Form ADV Part 2B, Item 2

Christian Z Cardoso (CRD#7422848)

Year of Birth: 1995

Post-Secondary Education:

- College for Financial Planning, Kaplan - Certified Financial Planner® – 2024
- Series 66 – Uniform Combined State Law Examination – 2023
- Series 63 – Uniform Securities Agent State Law – 2022
- Series 7 – General Securities Representative – 2022
- SIE – Securities Industry Essentials – 2021
- Utah Valley University, B.A. in Business Management - Emphasis in International Business – 2020

Material Business Experience:

- Ascend Investment Management, LLC., Investment Advisor Representative, (05/2026 – Current
- Charles Schwab and Co., Inc, Registered Representative, Investment Advisor Representative, (2022-2026)
- TD Ameritrade, Client Services, (2021-2022

Disciplinary Information

Form ADV Part 2B, Item 3

Christian Z Cardoso CFP® has not had any legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Christian Z Cardoso CFP® through the SEC's Investment Adviser Disclosure (IAPD) website at ***www.adviserinfo.sec.gov*** or FINRA's BrokerCheck database online at ***www.finra.org/brokercheck.*** The CRD number for Christian Z Cardoso CFP® is 7422848.

Other Business Activities

Form ADV Part 2B, Item 4

Christian Z Cardoso CFP® has no outside business activity that would require disclosure.

Additional Compensation

Form ADV Part 2B, Item 5

Aside from the sales commissions earned by Mr. Cardoso does not receive any additional compensation from non-clients for providing advisory services. For more details, see Item 10 of the Form ADV Part 2A.

Supervision

Form ADV Part 2B, Item 6

Mr. Cardoso is an Investment Advisor Representative of Ascend Investment Management, LLC; he works under the direct supervision of Tyler S. Olson, the Owner of Ascend Investment Management, LLC. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Advisory clients may contact the supervisor directly:
Tyler Olson, Owner
(801) 598-6957

Requirements for State-Registered Advisors

Form ADV Part 2B, Item 7

Ascend Investment Management, LLC would be required to disclose additional information for Mr. Cardoso if he had ever been the subject of a bankruptcy petition or ever been found liable in either: (a) an arbitration; or (b) a civil, self-regulatory organization, or administrative proceedings. As none of these apply to Christian, Ascend Investment Management, LLC has no additional information to disclose in this regard.