

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Alexander Kimes
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

This brochure supplement provides information about Alexander Kimes that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander Kimes is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Alexander Kimes

Year of Birth:

1998

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
University of Dayton	Bachelors	2016	2020

Business Background:

Name of Company	Position Held	Year Start	Year End
Great Lakes Cheese	Pricing Specialist	2020	2021
Payne and Payne Renovations and Design	Business Development Representative	2021	2022
EmVision Capital Advisors	Registered Staff Member	2022	2024
Commonwealth Financial Network	Registered Staff Member	2022	2024
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2024	Present

Disciplinary Information

Alexander Kimes does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

Fixed insurance sales; Located at 251 W Garfield Road, Suite 155, Aurora, OH 44202, as of 07/30/2024; 10% of time spent during business hours; Investment related.

The offering of fixed insurance products are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase these product or services from your advisor, you will pay your advisor additional and separate costs for these services which are in addition to the fees you pay for financial services in their role as a

Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase additional products or services from your advisor. You may purchase these products and services from the professional of your choice. Similar products and services may be available at an equal or lower cost from other sources.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Kimes is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Kimes's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Dennis Spontarelli
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

This brochure supplement provides information about Dennis Spontarelli that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Dennis Spontarelli is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Dennis Spontarelli

Year of Birth:

1955

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
University of Akron	Bachelor of Science - Finance	1973	1983

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2022	Present
LPL Financial, LLC	Advisor	2020	2022
Cantella & CO., INC	Advisor	2015	2020

Disciplinary Information

Dennis Spontarelli does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Co-Owner, D&K DDCT; Condominium rental, Located at 3 Braddock Bluff Drive, #1728, Hilton Head Island, SC, as of 2009; Approximately 5% time spent during business hours; Not investment related.

2. Fixed insurance sales; as of 6/21/2022, 1% of time spent during business hours; Investment related.

3. Co-Owner, Spontarelli Financial Services, a private entity established to facilitate securities, advisory, and insurance business; as of 09/1996; 100% of time spent during business hours; Investment related.

The sale and/or offering of real estate services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase these products or services from your advisor, you will pay your advisor additional and separate costs for these services which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase additional products or services from your advisor. You may purchase these products and services from the professional of your choice. Similar products and services may be available at an equal or lower cost from other sources.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Spontarelli is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Spontarelli's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

James Edward Zidd
EmVision Capital Advisors
5000 Gateway Dr. Ste 105
Medina, OH 44256
(330) 722-5653

This brochure supplement provides information about James Zidd that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about James Zidd is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

James Zidd

Year of Birth:

1957

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
University of Kansas	MBA	1975	1982
American College	RICP	2020	2021

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2023	Present
The Tavenner Company	Advisor	2018	2023
WH Colson Securites	Advisor	2010	2017

Disciplinary Information

James Zidd does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales; as of 06/01/1986; 20% of time spent during business hours; Investment related.
2. Owner, Zidd Financial Services, LLC a private entity established to facilitate securities, advisory, and insurance business; as of 07/18/2022; 95% of time spent during business hours; Investment related

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Zidd is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Zidd's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

James Robert Artale
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

This brochure supplement provides information about James Artale that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about James Artale is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

James Artale

Year of Birth:

1996

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
Washington and Jefferson College	Bachelor of Arts	2015	2019

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2022	Present
Tanglewood Golf Club	Pro Shot	2021	2021
Stratos Wealth Partners	Advisor	2019	2022
LPL Financial	Advisor	2019	2022
Axa Advisors	Advisor	2019	2019
Brooks Brothers	Salesman	2019	2019

Disciplinary Information

James Artale does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales; Located at as of 3/01/2022; 10% of time spent during business hours; Investment related.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under

advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Artale is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Artale's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Johnathon Michael Opet
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

This brochure supplement provides information about Johnathon Opet that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Johnathon Opet is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Johnathon Opet

Year of Birth:

1993

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
Allegheny College	Bachelor of Science - Mathematics	2012	2016

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2022	Present
LPL Financial LLC	Advisor	2017	2022
Stratos Wealth Partners, LTD	Advisor	2017	2022

Designations:

CFP® - CERTIFIED FINANCIAL PLANNER™: To obtain the CFP certification, your advisor had to complete a CFP-board registered program in financial planning or hold one of the following recognized designations: Certified Public Accountant (CPA), Chartered Financial Consultant® (ChFC®), Chartered Life Underwriter® (CLU®), Chartered Financial Analyst® (CFA®), PhD in Business or Economics, Doctor of Business Administration, or an Attorney's License. Additionally, your advisor had to demonstrate that he or she held a bachelor's degree (or higher) from an accredited college or university (if they earned their CFP certification on or after January 1st, 2007), and three years of full-time personal financial planning experience. Finally, the advisor had to pass a proctored examination to complete the course of study. To maintain the designation, your advisor completes 30 hours of continuing education every two years.

Disciplinary Information

Johnathon Opet does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales; as of 03/9/2022; 5% of time spent during business hours; Investment related.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Opet is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Opet's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Michael Anthony Embrescia
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

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Additional information about Michael Embrescia is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Michael Embrescia

Year of Birth:

1971

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
University of Toledo	Business Degree	1990	1994

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2022	Present
LPL Financial	Advisor	2014	2022
Stratos Wealth Partners	Advisor	2014	2022

Disciplinary Information

Michael Embrescia does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales; as of 03/01/2022; 25% of time spent during business hours; Investment related.
2. Owner, Brockway Properties, LLC, an entity created for the purpose of buying and managing residential real estate located in Fort Myers, FL, as of 07/26/2021; 2% of time spent during business hours; Investment related.
3. Co-owner & Partner 251 W Garfield, LLC, an entity created for the purpose of managing commercial real estate at 251 W Garfield Rd, Aurora, OH 44202, as of 1/01/2018; 5% of time spent during business hours; Investment related.

The sale and/or offering of real estate services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase these products or services from your advisor, you will pay your advisor additional and separate costs for these services which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase additional products or services from your advisor. You may purchase these products and services from the professional of your choice. Similar products and services may be available at an equal or lower cost from other sources.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business

meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Embrescia is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

James Artale, Partner and Chief Financial Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Embrescia's advisory activities. Mr. Artale may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Noah Anthony
EmVision Capital Advisors
251 W Garfield Road Suite 155
Aurora, OH 44202
(330) 954-3770

This brochure supplement provides information about Noah Anthony that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Noah Anthony is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Noah Anthony

Year of Birth:

2000

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
Stark State College	N/A	2019	2019
The Ohio State University	Associates & Bachelors	2020	2023

Business Background:

Name of Company	Position Held	Year Start	Year End
University	Student	2018	2023
EmVision Capital Advisors	Client Service Specialist	2023	2024
Commonwealth Financial Network	Registered Staff Member	2023	2024
EmVision Capital Advisors	Advisor	2025	Present
Commonwealth Financial Network	Advisor	2024	Present

Disciplinary Information

Noah Anthony does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Anthony is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Anthony's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Randal Kevin Mears
EmVision Capital Advisors
9930 Johnnycake Ridge Road, Suite 5A-1
Mentor, OH 44060
(440) 639-1998

This brochure supplement provides information about Randal Mears that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Randal Mears is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Randal Mears

Year of Birth:

1956

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
Kent State University	Associate Business	1976	1987

Business Background:

Name of Company	Position Held	Year Start	Year End
EmVision Capital Advisors	Financial Consultant	2025	Present
Commonwealth Financial Network	Advisor	1993	Present
Mears Financial Services	Financial Consultant	2003	2025

Disciplinary Information

Randal Mears does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales under name Mears Financial Services, Inc., investment related.
2. Mears Financial Services, Inc., president and sole owner of entity created for securities and insurance business, investment related.
3. Secretary of the Board of Directors; Cardinal Credit Union; located in Mentor, OH; as of 04/07/2011; 0% time spent during business hours; not investment related.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally

disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Mears is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Mears' advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.

EmVision Capital Advisors, LLC

Brochure Supplement

October 1, 2025

Stephen N Frank
EmVision Capital Advisors
5500 Frantz Road Suite 153
Dublin, OH 43017
(614) 761-9087

This brochure supplement provides information about Stephen Frank that supplements the EmVision Capital Advisors Brochure. You should have received a copy of that Brochure. Please contact us at (330) 954-3770 or e-mail info@emvisioncapital.com if you did not receive our Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen Frank is available on the SEC's website at www.adviserinfo.sec.gov

Educational Background and Business Experience

Advisor Name:

Stephen Frank

Year of Birth:

1964

Formal Education After High School:

Name of School	Degree Obtained	Year Start	Year End
Edinboro University of Pennsylvania	BS, BA	1982	1986

Business Background:

Name of Company	Position Held	Year Start	Year End
Investment Partners, Ltd	Investment Adviser Representative	2019	2024
Frank Wealth Management Group, Ltd	Owner/Advisor	2010	2018
Stoneburner & Frank Wealth Management Gr	Owner/Advisor	1999	2010
Commonwealth Financial Network	Registered Representative/Investment Adviser Representative	2008	Present
EmVision Capital Advisors	Advisor	2025	Present

Designations:

AIF® - Accredited Investment Fiduciary®: To obtain the AIF® designation, your advisor had to complete either a self-study module or a combination of a classroom and self-study module. The advisor then had to pass a closed-book, proctored examination to complete the course of study. To maintain the designation, your advisor completes six hours of continuing education every year.

Disciplinary Information

Stephen Frank does not have any material disciplinary history.

Other Business Activities

Your advisor is also a registered representative and investment adviser representative of Commonwealth's broker/dealer and advisory business and makes securities recommendations to clients through Commonwealth. As a dually registered investment adviser representative and a registered representative of Commonwealth's registered investment adviser and broker/dealer, respectively, your advisor has the choice of recommending advisory (fee-based) accounts and services, commission-based accounts, or both, to any client. When your advisor acts in the capacity of a broker/dealer registered representative by recommending a commission-based account, your advisor receives transactional commissions and mutual fund and money market 12b-1 fees based upon the specific investments recommended to the client. Your advisor's ability to recommend both fee-based and commission-based accounts and services to any particular client creates a conflict of interest for your advisor because the advice or recommendations provided by your advisor in selecting fee-based or commission-based accounts and services will directly impact the type, nature, amount, and duration of the compensation your advisor will receive.

Almost all Commonwealth advisors are also licensed insurance agents. Their sale of insurance products and services are separate and unrelated to their role as your Commonwealth financial advisor. Should you choose to purchase an insurance product from your advisor, you will pay commissions for these products which are in addition to the fees you pay for financial services in their role as a Commonwealth advisor. The receipt of additional compensation creates a conflict of interest. You are under no obligation to purchase insurance products or services from our advisor. You may purchase insurance products and services from the insurance agent of your choice. Similar products and services may be available at an equal or lower cost from other sources.

In addition to the activities described above, your advisor is also engaged in the following:

1. Fixed insurance sales, as of 07/01/2018, less than 10% time spent during securities trading hours per month;; Investment related.

Additional Compensation

Many of the companies that provide your advisor access to their products and programs provide your advisor with opportunities to receive additional compensation in the form of marketing and business reimbursements, compensation for client referrals, business development support, payment for travel-related costs and expenses for attending business meetings and conferences, and various forms of gifts and entertainment. Information regarding the compensation paid to your advisor in relation to the products or programs you purchase or use, and their associated conflicts, is generally disclosed in the respective product prospectuses, statements of additional information, product offering documents, client agreements, advisory program brochures, and Commonwealth's Form ADV Part 2A brochure.

Commonwealth offers your advisor one or more forms of financial benefits based on your advisor's total assets under advisement held at Commonwealth or in Commonwealth's own PPS Program accounts and/or for transitioning from another firm to Commonwealth. The types of financial benefits that your advisor receives from Commonwealth include, but may not be limited to, forgivable or unforgivable loans provided at below-market rates; debt or equity ownership investments in your advisor's business; increased payouts; and discounts or waivers on transaction, platform, and account fees, technology fees, research package fees, financial planning software fees, administrative fees, brokerage account fees, account transfer fees, licensing and insurance costs, and the cost of attending conferences and events. If your advisor is newly associated with Commonwealth, these benefits are commonly in the form of forgivable loans that are forgiven over a multi-year term subject to continued affiliation with Commonwealth and based on the size of the advisor's business at his or her prior firm, or the amount of assets maintained at Commonwealth after transition. These financial benefits, which can be significant to an advisor, present a conflict of interest because they provide a financial incentive for your advisor to select or maintain a business relationship with Commonwealth as a broker/dealer, investment adviser, or service and support provider for your accounts over other firms that may not provide your advisor similar financial benefits. They also provide a financial incentive for your advisor to recommend that a client open and maintain accounts with Commonwealth, and/or to use Commonwealth PPS programs over other programs available through Commonwealth.

Supervision

Mr. Frank is a supervised person and an Access Person (as defined under Rule 204A-1 of the Investment Advisers Act of 1940) of EmVision Capital Advisors LLC ("EmVision") and, as such, is subject to EmVision's compliance policies and procedures, in addition to the firm's Code of Ethics. The Compliance department periodically monitors supervised persons' trading for client accounts. EmVision has controls in place designed to ensure that portfolio management processes are consistent with the firm's fiduciary obligations to clients. In addition, supervised persons are required to complete regular compliance training.

Michael Embrescia, President and Chief Executive Officer of EmVision Capital Advisors LLC, has supervisory responsibility for Mr. Frank's advisory activities. Mr. Embrescia may be contacted at the telephone number listed on the cover page of this Part 2B Supplement.