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MATERIAL CHANGES

This Brochure, dated March 31, 2024, was prepared according to the SEC's requirements and rules. This Item is used to provide a summary of new or updated material information since the last annual update of our Brochure.

<u>Item 10</u> Other Financial Industry Activities and Affiliations

Updated Affiliate Information and Language

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

• Updated Gift and Entertainment Language



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