# **Cora Capital Advisors LLC**

# Form ADV Part 2A – Disclosure Brochure

Effective: February 24, 2025

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Cora Capital Advisors LLC ("CCA" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (856) 513-8600.

CCA is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about CCA to assist you in determining whether to retain the Advisor.

Additional information about CCA and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 318134.

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### Item 2 - Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of CCA. For convenience, the Advisor has combined these documents into a single disclosure document.

CCA believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. CCA encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the annual amendment filing on February 6<sup>th</sup>, 2024:

• The Advisor has established a fee minimum for Clients with less than \$100,000 in AUM. Please see item 5 and item 7 for more information.

# **Future Changes**

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with the Advisor's firm name or CRD# 318134. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (856) 513-8600.

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# Item 4 - Advisory Services

#### A. Firm Information

Cora Capital Advisors LLC ("CCA" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a Limited Liability Company ("LLC") under the laws of the State of New Jersey and founded in October 2014. CCA is owned by Cora Capital Group LLC. CCA is operated by Salvatore J. Cocivera (President and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by CCA.

### **B. Advisory Services Offered**

CCA offers investment advisory services to individuals, high net worth individuals, trusts, estates, and businesses (each referred to as a "Client").

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. CCA's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

# Wealth Management Services

CCA provides customized wealth management services for its Clients. This is achieved through continuous personal Client contact and interaction while providing a broad range of comprehensive financial planning in connection with discretionary investment management of Client portfolios. These services are described below.

#### **Investment Management Services**

CCA provides discretionary investment management services. CCA works closely with each Client to identify their investment goals, objectives, risk tolerance, and financial situation to create a portfolio strategy. CCA will then create an investment portfolio primarily consisting of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs"), bonds, securities traded over-the-counter and independent managers to achieve the Client's investment goals. The Advisor may retain other types of investments from the Client's legacy portfolio due to fit with the overall portfolio strategy, tax-related reasons, or other reasons as identified between the Advisor and the Client.

CCA's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. CCA will construct, implement, and monitor the strategies to ensure it meets the goals, objectives, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

CCA evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. CCA may recommend, on occasion, redistributing investment allocations to diversify the portfolio. CCA may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. CCA may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Under certain circumstances, CCA may accept or maintain custody of Client's funds or securities. Please see Item 15 – Custody for more information.

#### Financial Planning Services

CCA typically provides financial planning services as part of its overall wealth management services. CCA may also provide financial planning services on a standalone basis pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas

of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, tax planning and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

CCA may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. For standalone financial planning services, the plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### **Use of Independent Managers**

CCA may recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client will be provided with the Independent Manager's Form ADV Part 2A – Disclosure Brochure (or a brochure that makes the appropriate disclosures).

### Retirement Plan Advisory Services

CCA provides 3(21) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Performance Reporting
- Ongoing Investment Recommendation and Assistance

These services are provided by CCA serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of CCA's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### C. Client Account Management

Prior to engaging CCA to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

• <u>Establishing an Investment Strategy</u> – CCA, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.

- <u>Portfolio Construction</u> CCA will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- <u>Investment Management and Supervision</u> CCA will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

CCA does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by CCA.

#### E. Assets Under Management

As of December 31, 2024, CCA manages \$587,524,745 in Client assets, \$536,947,612 of which are managed on a discretionary basis and \$50,577,133 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

# Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one more written agreement with the Advisor.

# A. Fees for Advisory Services

#### Wealth Management Services

Wealth management fees are paid monthly, in advance of each month, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior month. For Clients with less than \$100,000 in assets under management, there is a minimum fee of \$1000 per household subject to the Advisor's Discretion. Wealth management fees are based on the following fee schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$500,000	1.15%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$3,000,000	0.75%
\$3,000,001 to \$5,000,000	0.65%
\$5,000,001 and over	0.50%

The wealth management fee in the first month of service is prorated from the inception date of the account[s] to the end of the first month. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by CCA will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### **Financial Planning Services**

CCA typically offers financial planning services as part of its overall wealth management services and fees. However, for Clients with less than \$2,000,000 in assets under management or for Clients seeking standalone financial planning services, CCA may offer financial planning services for a fixed project-based fee ranging from \$1,500 to \$7,500. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or overall costs will be provided to the Client prior to engaging for these services.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its wealth management fee as described above. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

# Retirement Plan Advisory Services

Fees for retirement plan advisory services are paid quarterly or monthly ("Billing Period"), in advance or arrears, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees range up to 1.00% annually. Retirement plan advisory fees are based on the market value of assets under management at the beginning, end, or average daily balance during the Billing Period. Fees may be negotiable depending on the size and complexity of the Plan.

#### B. Fee Billing

#### Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective month. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with CCA at the end of the prior month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. Clients are urged to also review the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by CCA to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are invoiced up to one hundred percent (100%) upon execution of the agreement.

#### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include CCA's wealth management fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Managers. The Independent Managers will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

#### C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than CCA, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by CCA are separate and distinct from these custody and execution fees.

In addition, all fees paid to CCA for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of CCA, but would not receive the services provided by CCA which are designed, among other things, to assist the Client in determining which products

or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CCA to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

# D. Advance Payment of Fees and Termination

### Wealth Management Services

CCA may be compensated for its wealth management services in advance of the month in which services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the month. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

### Financial Planning Services

For financial planning, CCA may require an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will promptly refund any unearned, prepaid planning fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

CCA may be compensated for its services in advance of the Billing Period in which retirement plan advisory services are rendered. Either party may request to terminate a retirement plan advisory agreement, at any time, by providing advance written notice to the other party. Upon termination, the Advisor will refund any unearned, prepaid retirement plan advisory fees from the effective date of termination to the end of the Billing Period. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest, the Advisor will have the discretion to terminate the relationship with the Independent Manager. The terms for termination are set forth in the respective agreements between the Advisor and the Independent Managers.

### E. Compensation for Sales of Securities

CCA does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

#### **Broker-Dealer Affiliation**

Certain Advisory Persons of CCA are also registered representatives of Osaic Wealth, Inc. ("Osaic"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of Osaic, an Advisory Person implements securities transactions under Osaic and not through CCA. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to CCA's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. CCA mitigates this conflict in two ways. First, Clients always have the right to choose whether or not to purchase securities products through an Advisory Person. Second, CCA will not charge an ongoing investment advisory fee on any assets implemented in one's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

# **Insurance Agency Affiliations**

Certain Advisory Persons are also licensed insurance professionals. As an insurance professional, Advisory Persons earn commission-based compensation for selling insurance products, including insurance products sold to Clients. Insurance commissions earned by Advisory Persons are separate and in addition to the Advisor's advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

CCA does not charge performance-based fees for its investment advisory services. The fees charged by CCA are as described in Item 5 above and <u>are not</u> based upon the capital appreciation of the funds or securities held by any Client. CCA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

# Item 7 – Types of Clients

CCA offers investment advisory services to individuals, high net worth individuals, trusts, estates, and businesses. The amount of each type of Client is available on CCA's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. For Clients with less than \$100,000 in assets under management, there is a minimum fee of \$1000 per household subject to the Advisor's Discretion.

# Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

# A. Methods of Analysis

CCA primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from CCA are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, CCA generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. CCA will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, CCA may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

#### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. CCA will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may

lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### **ETF Risks**

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

### **Options Contracts**

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

# **Margin Borrowings**

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

# Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving CCA or its owners. CCA values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with the Advisor's firm name or CRD# 318134.

# Item 10 – Other Financial Industry Activities and Affiliations

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation, nor does this present a material conflict of interest. The Advisor will only earn its wealth management fee as described in Item 5.A.

### **Broker-Dealer Affiliation**

As mentioned in Item 5.E, certain Advisory Persons are also a registered representative of Osaic. In their separate capacity as registered representatives, Advisory Persons will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

#### **Insurance Agency Affiliations**

As mentioned in Item 5.E, certain Advisory Persons are licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with the Advisor. As an insurance professional, Advisory Persons receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

### Cora Capital Assurance LLC

Cora Capital Assurance LLC ("Cora Capital Assurance") is an affiliated entity which is owned by Cora Capital Group LLC. Clients of CCA may be referred to Cora Capital Assurance for certain insurance products. This practice presents a conflict of interest as certain Advisory Persons may receive compensation as owners of Cora Capital Group LLC. CCA does not receive any referral fees or compensation from Cora Capital Assurance.

#### Baratz & Associates, P.A.

Certain Advisory Persons of CCA are also Partners of Baratz & Associates, P.A. ("BA"). BA offers accounting, business consulting, tax planning, and other related services. Services provided by BA are separate and distinct from the investment advisory services offered by CCA. CCA may recommend Clients engage BA for accounting and tax services. Clients are under no obligation to utilize the services of BA in order to have an advisory relationship with CCA.

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

# A. Code of Ethics

CCA has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with CCA ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. CCA and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of CCA's

Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (856) 513-8600.

### **B. Personal Trading with Material Interest**

CCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. CCA does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. CCA does not have a material interest in any securities traded in Client accounts.

# C. Personal Trading in Same Securities as Clients

CCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by CCA requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### D. Personal Trading at Same Time as Client

While CCA allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will CCA, or any Supervised Person of CCA, transact in any security to the detriment of any Client.

# Item 12 - Brokerage Practices

# A. Recommendation of Custodian[s]

CCA does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize CCA to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, CCA does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where CCO does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost from the Advisor associated with using a custodian not recommended by CCA. However, CCA may be limited in the services it can provide if the recommended Custodian is not engaged. CCA may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

CCA will generally recommend that Clients establish their account[s] at Pershing Advisor Solutions, a division of Pershing, LLC ("Pershing") or Charles Schwab & Co., Inc. ("Schwab"), FINRA-registered broker-dealers and members SIPC. Pershing or Schwab will serve as the Client's "qualified custodian". CCA maintains an institutional relationship with Pershing and Schwab, whereby the Advisor receives economic benefits. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. CCA does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.

- **2.** Brokerage Referrals CCA does not receive any compensation from any third party in connection with the recommendation for establishing an account.
- 3. Directed Brokerage All Clients are serviced on a "directed brokerage basis", where CCA will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). CCA will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

# **B.** Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results considering such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. CCA will execute its transactions through the Custodian as authorized by the Client. CCA may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

#### Item 13 – Review of Accounts

#### A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons and on a periodic basis by Salvatore Cocivera, Chief Compliance Officer of CCA. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

#### **B.** Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify CCA if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

# C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

#### Item 14 – Client Referrals and Other Compensation

#### A. Compensation Received by CCA

CCA may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, CCA may receive non-compensated referrals of new Clients from various third parties.

#### Participation in Institutional Advisor Platform - Pershing

CCA has established an institutional relationship with Pershing to assist the Advisor in managing Client account[s]. Access to the Pershing platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Pershing. The software and related financial support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first.

Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services.

#### Participation in Institutional Advisor Platform - Schwab

CCA has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like CCA. As a registered investment advisor participating on the Schwab Advisor Services platform, CCA receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to CCA that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. CCA believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

#### **B.** Compensation for Client Referrals

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

### Item 15 – Custody

The Advisor is considered to have custody under the following circumstances and is consequently required to undergo an annual surprise examination.

As CCA is deemed to have custody over certain Client accounts and/or securities as part of their ability to serve as a trustee on Client accounts, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which CCA maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (www.adviserinfo.sec.gov).

Additionally, the Advisor is considered to have custody under the following limited circumstances. However, specific safeguards have been implemented to ensure that the associated Clients and accounts are exempt from an annual surprise examination.

Deduction of Advisory Fees - To ensure compliance with regulatory requirements associated with the deduction of advisory fees, all Clients for whom CCA exercises discretionary authority must hold their assets with a "qualified custodian." Clients are responsible for engaging a "qualified custodian" to safeguard their funds and securities and must instruct CCA to utilize that Custodian for securities transactions on their behalf. Clients are encouraged to review statements provided by the Custodian and compare to any reports provided by CCA to ensure accuracy, as the Custodian does not perform this review.

#### Item 16 - Investment Discretion

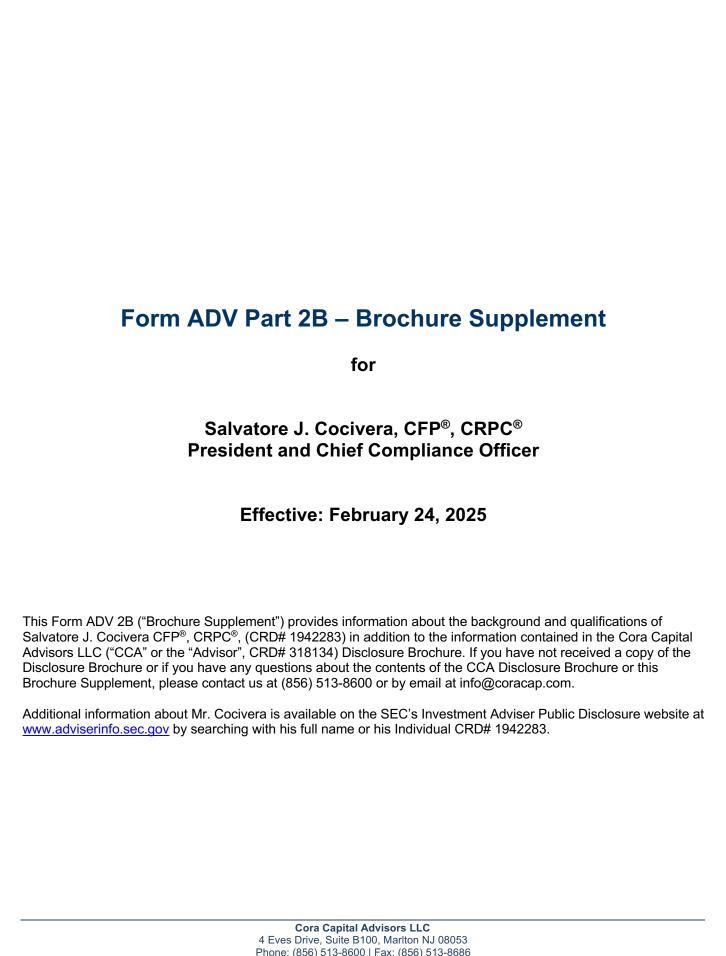
CCA generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by CCA. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by CCA will be in accordance with each Client's investment objectives and goals.

# **Item 17 – Voting Client Securities**

CCA does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### Item 18 – Financial Information

Neither CCA, nor its management, have any adverse financial situations that would reasonably impair the ability of CCA to meet all obligations to its Clients. CCA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



# Item 2 – Educational Background and Business Experience

Salvatore J. Cocivera, CFP®, CRPC®, born in 1968, is dedicated to advising Clients of CCA as the President and Chief Compliance Officer. Mr. Cocivera earned a MS - Financial Services from College for Financial Planning in 2013. Mr. Cocivera also earned a BSBA - Finance from Drexel University in 1991. Additional information regarding Mr. Cocivera's employment history is included below.

**Employment History:** 

President and Chief Compliance Officer, Cora Capital Advisors LLC	02/2022 to Present
Registered Representative, Osaic Wealth, Inc formerly American Portfolios Financial Services, Inc.	11/2009 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	11/2009 to 12/2022

# CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject
  areas that CFP Board's studies have determined as necessary for the competent and professional delivery
  of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States
  college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas
  include insurance planning and risk management, employee benefits planning, investment planning, income
  tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

# Chartered Retirement Planning Counselor™ ("CRPC®")

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning, and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of- course examination that tests

their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct, and complying with self-disclosure requirements.

# **Item 3 – Disciplinary Information**

There are no legal, civil or disciplinary events to disclose regarding Mr. Cocivera. Mr. Cocivera has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Cocivera.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Cocivera.

However, we do encourage you to independently view the background of Mr. Cocivera on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 1942283.

#### Item 4 – Other Business Activities

#### **Broker-Dealer Affiliation**

Mr. Cocivera is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD# 23131), member FINRA, SIPC. In Mr. Cocivera's separate capacity as a registered representative, Mr. Cocivera will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Cocivera. Neither the Advisor nor Mr. Cocivera will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Cocivera's separate capacity as a registered representative. Mr. Cocivera spends approximately 5% of his time per month in his role as a registered representative of Osaic.

#### Insurance Agency Affiliations

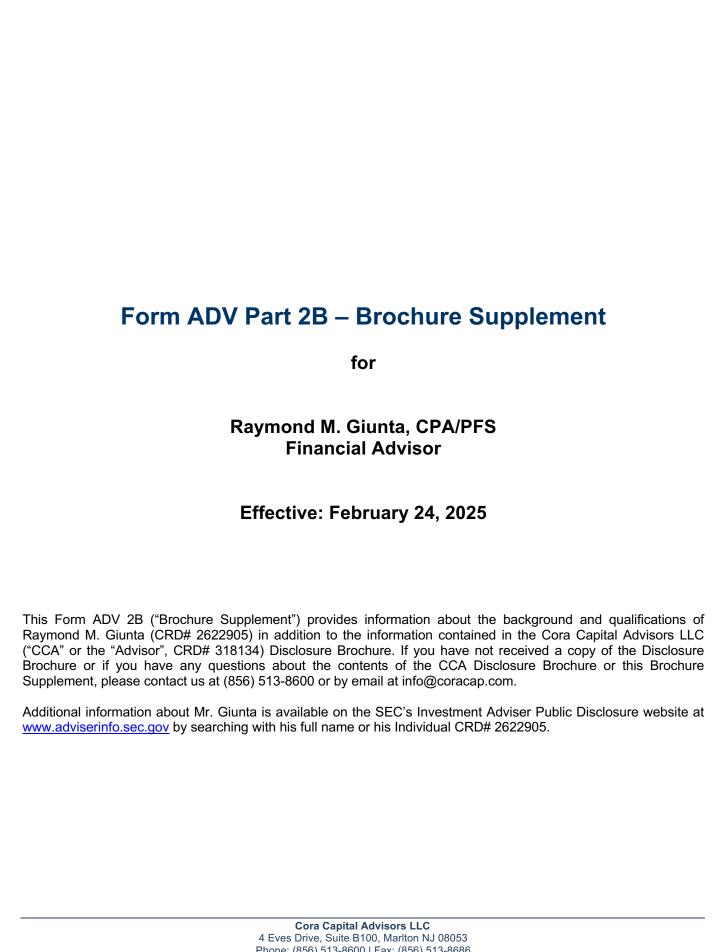
Mr. Cocivera is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Cocivera's role with CCA. As an insurance professional, Mr. Cocivera will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Cocivera is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Cocivera or the Advisor. Mr. Cocivera spends approximately 5% of his time per month in this capacity.

# Item 5 – Additional Compensation

Mr. Cocivera has additional business activities where compensation is received that are detailed in Item 4 above.

#### Item 6 – Supervision

Mr. Cocivera serves as the President and Chief Compliance Officer of CCA. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 – Educational Background and Business Experience

Raymond M. Giunta, born in 1957, is dedicated to advising Clients of CCA as a Financial Advisor. Mr. Giunta earned a B.A. - Accounting from Rutgers University in 1980. Mr. Giunta also earned an A.A. - Accounting from Burlington County College in 1977. Additional information regarding Mr. Giunta's employment history is included below.

**Employment History:** 

Financial Advisor, Cora Capital Advisors LLC	02/2022 to Present
Partner, Baratz & Associates, P.A.	01/1986 to Present
Registered Representative, Osaic Wealth, Inc. formerly American Portfolios Financial Services, Inc	11/2011 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	11/2011 to 12/2022
Owner, Pillar Benefits LLC	06/2007 to 11/2011
Registered Representative, PTS Brokerage, LLC	01/2007 to 11/2011
Partner, Pillar Wealth Management	12/2006 to 11/2011

# Certified Public Accountant™ ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants™ (AICPA®) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

# Personal Financial Specialist ("PFS™")

The PFS<sup>TM</sup> credential demonstrates that an individual has met the minimum education, experience, and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS<sup>TM</sup> credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of individual financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA<sup>®</sup>. A PFS<sup>TM</sup> credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS<sup>TM</sup> credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS<sup>TM</sup> credential is administered through the AICPA<sup>®</sup>.

### **Item 3 – Disciplinary Information**

There are no legal, civil or disciplinary events to disclose regarding Mr. Giunta. Mr. Giunta has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Giunta.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Giunta.

However, we do encourage you to independently view the background of Mr. Giunta on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 2622905.

#### Item 4 – Other Business Activities

#### **Broker-Dealer Affiliation**

Mr. Giunta is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD# 23131), member FINRA, SIPC. In Mr. Giunta's separate capacity as a registered representative, Mr. Giunta will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Giunta. Neither the Advisor nor Mr. Giunta will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Giunta's separate capacity as a registered representative. Mr. Giunta spends approximately 5% of his time per month in his role as a registered representative of Osaic.

### **Insurance Agency Affiliations**

Mr. Giunta is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Giunta's role with CCA. As an insurance professional, Mr. Giunta will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Giunta is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Giunta or the Advisor. Mr. Giunta spends approximately 10% of his time per month in this capacity.

#### Baratz & Associates, P.A.

Mr. Giunta is a Partner of Baratz & Associates, P.A. ("BA"). BA offers accounting, business consulting, tax planning, and other related services. Services provided by BA are separate and distinct from the investment advisory services offered by CCA. CCA may recommend Clients engage BA for accounting and tax services. Clients are under no obligation to utilize the services of BA in order to have an advisory relationship with CCA. Mr. Giunta spends over 50% of his time per month in this capacity.

# Item 5 – Additional Compensation

Mr. Giunta has additional business activities where compensation is received that are detailed in Item 4 above.

# Item 6 – Supervision

Mr. Giunta serves as a Financial Advisor of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 - Educational Background and Business Experience

Mark H. Wander, born in 1952, is dedicated to advising Clients of CCA as a Financial Advisor. Wander also earned a B.A. from Drexel University in 1974. Additional information regarding Mr. Wander's employment history is included below.

**Employment History:** 

Financial Advisor, Cora Capital Advisors LLC	02/2022 to Present
Founding Partner, Baratz & Associates, P.A.	01/1982 to Present
Registered Representative, Osaic Wealth, Inc. formerly American Portfolios	11/2011 to Present
Financial Services, Inc	11/2011 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	11/2011 to 12/2022
Member, Pillar Benefits, LLC	06/2007 to 11/2011
Member, Pillar Wealth Management	12/2006 to 11/2011
Registered Representative, PTS Brokerage, LLC	01/2007 to 11/2011

# Certified Public Accountant™ ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants™ (AICPA®) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

# Personal Financial Specialist ("PFS™")

The PFS<sup>TM</sup> credential demonstrates that an individual has met the minimum education, experience, and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS<sup>TM</sup> credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of individual financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA<sup>®</sup>. A PFS<sup>TM</sup> credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS<sup>TM</sup> credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS<sup>TM</sup> credential is administered through the AICPA<sup>®</sup>.

# Item 3 - Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Wander. Mr. Wander has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Wander.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Wander.

However, we do encourage you to independently view the background of Mr. Wander on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 2622896.

### Item 4 - Other Business Activities

#### **Broker-Dealer Affiliation**

Mr. Wander is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD#23131), member FINRA, SIPC. In Mr. Wander's separate capacity as a registered representative, Mr. Wander will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Wander. Neither the Advisor nor Mr. Wander will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Wander's separate capacity as a registered representative. Mr. Wander spends approximately 5% of his time per month in his role as a registered representative of Osaic.

#### **Insurance Agency Affiliations**

Mr. Wander is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Wander's role with CCA. As an insurance professional, Mr. Wander will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Wander is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Wander or the Advisor. Mr. Wander spends approximately 10% of his time per month in this capacity.

#### Baratz & Associates, P.A.

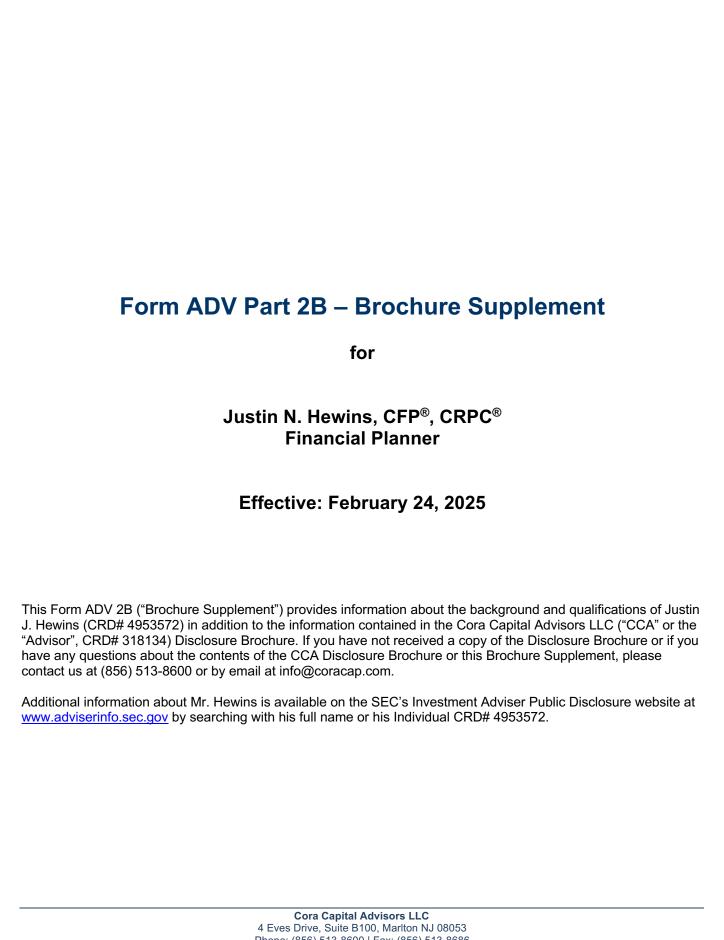
Mr. Wander is a Partner of Baratz & Associates, P.A. ("BA"). BA offers accounting, business consulting, tax planning, and other related services. Services provided by BA are separate and distinct from the investment advisory services offered by CCA. CCA may recommend Clients engage BA for accounting and tax services. Clients are under no obligation to utilize the services of BA in order to have an advisory relationship with CCA. Mr. Wander spends over 50% of his time per month in this capacity.

# Item 5 – Additional Compensation

Mr. Wander has additional business activities where compensation is received that are detailed in Item 4 above.

# Item 6 - Supervision

Mr. Wander serves as a Financial Advisor of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 - Educational Background and Business Experience

Justin J. Hewins, born in 1983, is dedicated to advising Clients of CCA as a Financial Planner. Mr. Hewins earned a BS - Finance from Philadelphia University. Additional information regarding Mr. Hewins's employment history is included below.

**Employment History:** 

Financial Planner, Cora Capital Advisors LLC	02/2022 to Present
Registered Representative, Osaic Wealth, Inc. formerly American Portfolios Financial Services, Inc	04/2010 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc	04/2010 to 12/2022
Financial Advisor, Ameriprise Financial Services, Inc.	08/2005 to 04/2010

# CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject
  areas that CFP Board's studies have determined as necessary for the competent and professional delivery
  of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States
  college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas
  include insurance planning and risk management, employee benefits planning, investment planning, income
  tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

# Chartered Retirement Planning Counselor™ ("CRPC®")

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning, and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests

their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct, and complying with self-disclosure requirements.

# Item 3 - Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hewins. Mr. Hewins has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hewins.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hewins.

However, we do encourage you to independently view the background of Mr. Hewins on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 4953572.

### Item 4 - Other Business Activities

#### **Broker-Dealer Affiliation**

Mr. Hewins is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD# 23131), member FINRA, SIPC. In Mr. Hewins's separate capacity as a registered representative, Mr. Hewins will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Hewins. Neither the Advisor nor Mr. Hewins will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Hewins's separate capacity as a registered representative. Mr. Hewins spends approximately 5% of his time per month in his role as a registered representative of Osaic.

#### **Insurance Agency Affiliations**

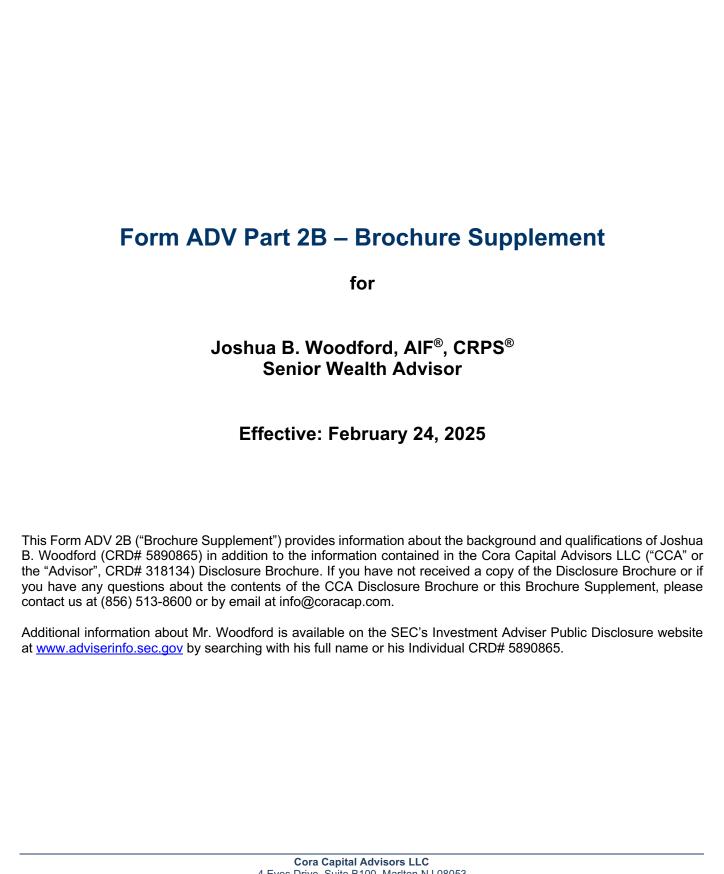
Mr. Hewins is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Hewins's role with CCA. As an insurance professional, Mr. Hewins will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hewins is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hewins or the Advisor. Mr. Hewins spends approximately 5% of his time per month in this capacity.

### Item 5 – Additional Compensation

Mr. Hewins has additional business activities where compensation is received that are detailed in Item 4 above.

# Item 6 – Supervision

Mr. Hewins serves as a Financial Planner of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 - Educational Background and Business Experience

Joshua B. Woodford, born in 1983, is dedicated to advising Clients of CCA as a Senior Wealth Advisor. Mr. Woodford earned a B.S. in Economics from Washington College in 2005. Additional information regarding Mr. Woodford's employment history is included below.

**Employment History:** 

Senior Wealth Advisor, Cora Capital Advisors LLC	02/2022 to Present
Registered Representative, Osaic Wealth, inc. formerly American Portfolios Financial Services, Inc	08/2020 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	08/2020 to 12/2022
Senior Wealth Advisor, Redwood Wealth Management Group	11/2015 to 08/2020
Registered Representative, Purshe Kaplan Sterling Investments	01/2016 to 03/2020
Senior Financial Advisor, Lane Bridgers Schill	08/2012 to 12/2015
Registered Representative, Purshe Kaplan Sterling Investments	10/2013 to 07/2015
Financial Advisor, Morgan Stanley Smith Barney	02/2011 to 07/2012

# Accredited Investment Fiduciary™ ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary<sup>™</sup> (AIF®) designation has been the mark of commitment to a standard of fiduciary investment excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

# Chartered Retirement Plans Specialist ("CRPS®")

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

#### Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Woodford. Mr. Woodford has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Woodford.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Woodford.

However, we do encourage you to independently view the background of Mr. Woodford on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 5890865.

#### Item 4 – Other Business Activities

#### **Broker-Dealer Affiliation**

Mr. Woodford is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD# 23131), member FINRA, SIPC. In Mr. Woodford's separate capacity as a registered representative, Mr. Woodford will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Woodford. Neither the Advisor nor Mr. Woodford will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Woodford's separate capacity as a registered representative. Mr. Woodford spends approximately 5% of his time per month in his role as a registered representative of Osaic.

### **Insurance Agency Affiliations**

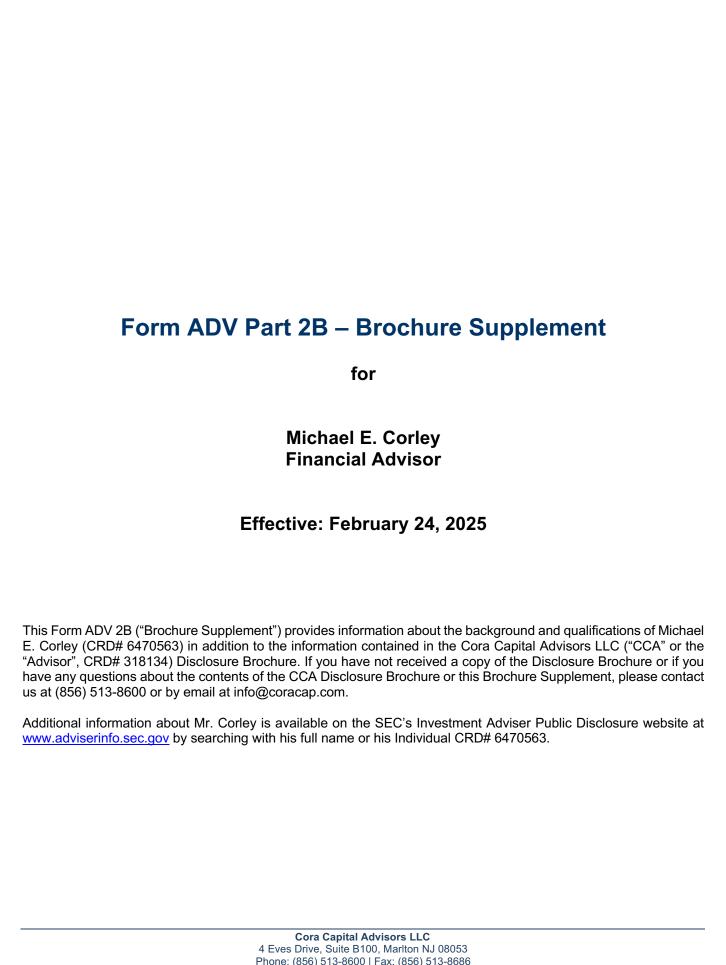
Mr. Woodford is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Woodford's role with CCA. As an insurance professional, Mr. Woodford will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Woodford is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Woodford or the Advisor. Mr. Woodford spends approximately 5% of his time per month in this capacity.

# Item 5 – Additional Compensation

Mr. Woodford has additional business activities where compensation is received that are detailed in Item 4 above.

# Item 6 – Supervision

Mr. Woodford serves as a Senior Wealth Advisor of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 - Educational Background and Business Experience

Michael E. Corley, born in 1990, is dedicated to advising Clients of CCA as a Financial Advisor. Mr. Corley earned an A.A. - Political Science from Burlington County College in 2015. Additional information regarding Mr. Corley's employment history is included below.

**Employment History:** 

Financial Advisor, Cora Capital Advisors LLC	02/2022 to Present
Registered Representative, Osaic Wealth, Inc. formerly American Portfolios Financial Services, Inc	04/2015 to Present
Investment Advisor Representative, American Portfolios Advisors, Inc.	04/2015 to 12/2022
Student	01/2008 to 04/2015

# Item 3 - Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Corley. Mr. Corley has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Corley.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Corley.

However, we do encourage you to independently view the background of Mr. Corley on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 6470563.

#### Item 4 – Other Business Activities

#### **Broker-Dealer Affiliation**

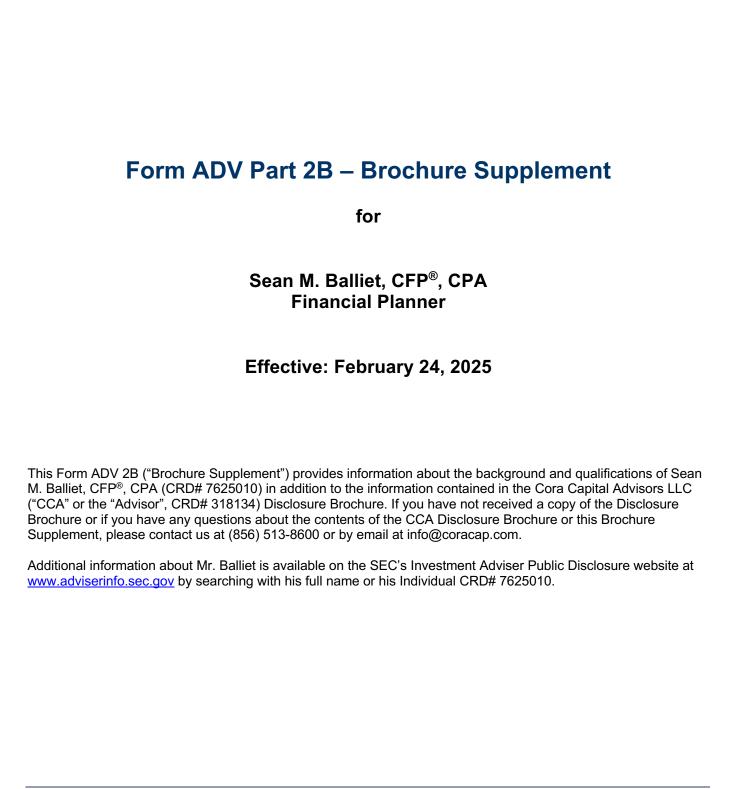
Mr. Corley is also a registered representative of Osaic Wealth, Inc ("Osaic"). Osaic is a registered broker-dealer (CRD# 23131), member FINRA, SIPC. In Mr. Corley's separate capacity as a registered representative, Mr. Corley will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Corley. Neither the Advisor nor Mr. Corley will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Corley's separate capacity as a registered representative. Mr. Corley spends approximately 5% of his time per month in his role as a registered representative of Osaic.

### Item 5 – Additional Compensation

Mr. Corley has additional business activities where compensation is received that are detailed in Item 4 above.

#### Item 6 – Supervision

Mr. Corley serves as a Financial Advisor of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.



# Item 2 - Educational Background and Business Experience

Sean M. Balliet, CFP®, CPA born in 1979, is dedicated to advising Clients of CCA as a Financial Planner. Mr. Balliet earned a BS in Accounting from Rutgers University - Camden in 2001. Additional information regarding Mr. Balliet's employment history is included below.

**Employment History:** 

Financial Planner, Cora Capital Advisors LLC	09/2022 to Present
Partner, Baratz & Associates, P.A.	11/2013 to Present
Tax Supervisor, Gunnip & Company	10/2010 to 10/2013

# CERTIFIED FINANCIAL PLANNER™ ("CFP®")

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  areas that CFP Board's studies have determined as necessary for the competent and professional delivery
  of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States
  college or university (or its equivalent from a foreign university). CFP Board's financial planning subject
  areas include insurance planning and risk management, employee benefits planning, investment planning,
  income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field: and
- Ethics Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

# Certified Public Accountant™ ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants™ (AICPA®) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's® Code of Professional Conduct within their state accountancy laws or have created their own.

# **Item 3 – Disciplinary Information**

There are no legal, civil or disciplinary events to disclose regarding Mr. Balliet. Mr. Balliet has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Balliet.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Balliet.* 

However, we do encourage you to independently view the background of Mr. Balliet on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> by searching with his full name or his Individual CRD# 7625010.

#### Item 4 – Other Business Activities

#### Baratz & Associates, P.A.

Mr. Balliet is a Partner of Baratz & Associates, P.A. ("BA"). BA offers accounting, business consulting, tax planning, and other related services. Services provided by BA are separate and distinct from the investment advisory services offered by CCA. CCA may recommend Clients engage BA for accounting and tax services. Clients are under no obligation to utilize the services of BA in order to have an advisory relationship with CCA. Mr. Balliet spends over 50% of his time per month in this capacity.

# Item 5 – Additional Compensation

Mr. Balliet has additional business activities where compensation is received that are detailed in Item 4 above.

#### Item 6 – Supervision

Mr. Balliet serves as a Financial Planner of CCA and is supervised by Salvatore Cocivera, the Chief Compliance Officer. Mr. Cocivera can be reached at (856) 513-8600.

# **Privacy Policy**

Effective: February 24, 2025

#### **Our Commitment to You**

Cora Capital Advisors LLC ("CCA" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. CCA (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

CCA does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

# Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

# What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es] Investment activity	
Account information (including other institutions)	Investment experience and goals

#### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

# How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

# How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes CCA does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CCA or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients CCA does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### **Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

# Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (856) 513-8600.