cornerstone
WEALTH PARTNERS

Form ADV Part 2A

Firm Brochure

October 2026

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Cornerstone Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (517) 381-3450. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Cornerstone Wealth Partners, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Cornerstone Wealth Partners, LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Cornerstone Wealth Partners, LLC CRD number is 146602.

Item 2 – Material Changes

Our last annual update to this brochure was in March 2026. It reported the following material changes since our March 2025 annual update:

- Item 4 has been updated to include investment advisory and management services to workplace retirement plans, as well as include IRA/DOL Rollover information.
- Item 10 has been updated to reflect that Evan Vanderwey no longer is a Loan Officer with Churchill Mortgages.

Since March 2026 we have made only non-material updates to this brochure.

Item 3 – Table of Contents

Item 1 – Cover Page 1
Item 2 – Material Changes 2
Item 3 – Table of Contents 2
Item 4 – Advisory Business 3
Item 5 – Fees and Compensation 6
Item 6 – Performance-Based Fees and Side by Side Management 8
Item 7 – Types of Clients 9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss 9
Item 9 – Disciplinary Information 10
Item 10 – Other Financial Industry Activities and Affiliations 10
Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading 11
Item 12 – Brokerage Practices 12
Item 13 – Review of Accounts 12
Item 14 – Client Referrals and Other Compensation 13
Item 15 – Custody 13
Item 16 – Investment Discretion 13
Item 17 – Voting Client Securities 14
Item 18 – Financial Information 14

Item 4 – Advisory Business

Ownership/advisory history

Cornerstone Wealth Partners, LLC ("Cornerstone Wealth Partners") is a Michigan Limited Liability Company and an SEC registered Investment Adviser. Evan Vanderwey and Steve Vanderwey founded Cornerstone Wealth Partners in 2008. In March 2020, Steven Vanderwey sold his ownership interest to Evan Vanderwey who is now our sole owner and Managing Member.

At Cornerstone Wealth Partners, our objective is to help you invest your assets with a goal of meeting your investment objectives and financial needs.

Advisory services offered

Financial consultations

We provide financial consultations on matters involving securities as well as non-securities topics, such as debt reduction and real estate. First, we will meet with you to discuss your current financial situation. We analyze your investment portfolio, including what you own, how it is allocated across asset classes and regions, how concentrated it is, and what you pay in fund and advisory fees.

The goal of this analysis is for you to gain an understanding of how diversified your current portfolio is, what it costs, and the amount of overlap you may have in your current portfolio.

In addition, we can provide specialized investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern or specific topic. You may engage us to help you identify your investment philosophy, understand your investment strategy, and provide discipline throughout your investment experience. If you would like ongoing financial consultations, we coach you in your investment decision-making processes to help you stay on track for achieving the results you want.

In our discussions with you, we will make recommendations for implementing the investment advice we give you. You are under no obligation to act on our recommendations. Moreover, if you elect to act on any of our recommendations, there is no obligation to effect a transaction through any company recommended by us. Our recommendations are based on your financial situation at the time our analysis is presented and based on financial information disclosed by you to us. Certain assumptions are made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We do not offer any guarantees or promises that your financial goals and objectives will be met.

Please note: When we provide financial planning services and you implement the financial plan through one of our representatives, the representative may receive compensation in the form of a commission or fee. This creates a conflict of interest between the representative and you. Therefore, when providing financial planning services, we would like you to note: (a) a conflict of interest exists between the representatives' interests and your interests, (b) you are under no obligation to act upon the recommendation, and (c) if you elect to act on any of the recommendations, you are under no obligation to effect the transaction through the representative. If the financial plan recommends insurance products and you implement the recommendation of such products through our representative, the representative may receive compensation in the form of a commission or fee. Please see Item 10.D – Other Industry Affiliations for details regarding conflicts of interests associated with the sale of insurance products.

Investment management

Depending upon the results of our review or analysis and your individual situation, we will recommend the investment of your capital into one of our globally diversified investment models. All recommendations depend on your circumstances, goals and objectives, strategy desired, account size, risk tolerance, and other factors. You are not obligated to take advantage of any of our recommendations. Clients may not impose restrictions on investing in certain securities or types of securities.

Cornerstone Wealth Partners operates under two arrangements to manage investments:

Asset management

Cornerstone Wealth Partners offers discretionary asset management services to advisory clients. Under this arrangement you will enter into a written Investment Advisory Agreement with Cornerstone Wealth Partners wherein you authorize Cornerstone Wealth Partners to supervise and direct your investment accounts on a discretionary basis in accordance with the investment objectives for each account.

Co-advisor

Cornerstone Wealth Partners also acts as a Co-Advisor with Matson Money Inc. to manage client accounts. Under this arrangement you will enter into a written Investment Advisory Agreement with Matson Money and Cornerstone Wealth Partners wherein you authorize Matson Money to supervise and direct your investment accounts on a discretionary basis in accordance with the investment objectives for each account.

Our responsibilities include:

- Providing you with Matson Money's Form ADV Part 2,
- Ensuring that information about your specific goals, financial situation and risk preference remain current,
- Assisting you in determining appropriate allocation models,
- Reviewing account activity periodically,
- Contacting or meeting with you annually, and
- Responding to your inquiries.

IRA rollover

As part of our advisory services, Cornerstone may provide recommendations and advice concerning your employer retirement plan or other qualified retirement accounts. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options):

(i) leave the money in the former employer's plan, if permitted,

(ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted,

(iii) roll over to an Individual Retirement Account ("IRA"), or

(iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences).

Each of these has advantages and disadvantages and before making any changes Cornerstone encourages clients to speak with their CPA and/or tax attorney.

When Cornerstone provides rollover advice to a client or prospect regarding a retirement plan account or individual retirement account, the Firm is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. If Cornerstone recommends that a client roll over their retirement plan assets or transfer an IRA into an account to be managed by Cornerstone, the Firm will earn an advisory fee on the rolled over assets, that recommendation creates a

conflict of interest. Accordingly, Cornerstone operates under a special rule that requires the Firm to act in the client or prospect's best interest and not put its own interest ahead of the client's or prospect's.

No client is under any obligation to roll over retirement plan assets or transfer IRA assets to an account managed by Cornerstone. Cornerstone's Chief Compliance Officer is available to address any questions that a client or prospective client may have regarding the conflict of interest presented by such rollover recommendation.

College savings

If you have a need for a college savings plan, we will discuss a range of options available to you, including ESA accounts, 529 Plans, and Non-Qualified or UTMA accounts.

If you choose a Section 529 College Savings Plan, we will provide you with a prospectus that discusses services, fees, types of investments, among other things. We will also make sure that you have received or have access to, via the Internet, the underlying funds' prospectuses. If you have any questions, we will be happy to answer them. If you choose to proceed with investing in a Section 529 College Savings Plan, we will explain and assist you with the paperwork required to open an account. We will act as a liaison between you and the issuer. Ongoing, we will review your account activity on a regular basis and not less than annually, meet with you to re-assess your financial situation and to help you determine if your investment is appropriately allocated into the correct models. You will sign a limited power of attorney to give Cornerstone Wealth Partners the authority to act on your behalf when re-allocating investment options. However, we do not exercise discretion over these investments other than to facilitate your instructions.

Investor education services

We provide articles, newsletters, and video content (at no cost) on occasion. Content is educational, timely, and helps readers to understand their investment needs.

From time to time, Cornerstone Wealth Partners may hold events designed to provide prospective clients and clients with information about investing. There is no charge or obligation to those attending these events.

Coaching events

We host coaching events for individuals to uncover important distinctions around money and investing. We will discuss current events, the state of markets, and how to apply academic principles of investing. There is no charge to attend these events. These events are separate from the services offered and are open to the public (clients and non-clients) to attend.

Workplace plans

In addition to our individual client services, we provide investment advisory and management services for workplace retirement plans, including 401(k) plans, 403(b) plans, SIMPLE IRAs, and similar employer-sponsored retirement accounts. Our services in this area include assisting plan sponsors with investment selection, ongoing monitoring, and participant education, tailored to meet the specific needs of the plan and its participants, while adhering to applicable fiduciary standards and regulatory requirements.

Additional services

Generally, our advice about securities investments is limited to mutual funds, ETFs, and Section 529 College Savings Plans.

Wrap program

We do not sponsor a wrap program.

Client assets managed

As of December 31, 2025, we manage $145,905,522 on behalf of 429 client households and businesses. We also advise on and monitor client assets held with Third-Party Investment Advisers.

Item 5 – Fees and Compensation

Financial consultations

We do not charge a fee for an initial consultation, a discussion of your financial needs and goals, or the preparation of a market investment analysis of your portfolio.

For ongoing financial consulting where our services include ensuring that information about your specific goals, financial situation and risk preference remain current, assisting you in determining appropriate allocation models, reviewing account activity periodically, meeting with you at least annually, and responding to your inquiries, you will pay an annual flat fee ranging from $100 to $10,000 depending on the level and scope of the services required.

The agreement you and Cornerstone Wealth Partners, LLC sign will detail the scope of the services to be provided and the fee for such services. Fees are charged and collected in advance of services, payable by check or credit card. You will have five (5) business days to terminate the agreement without charge. Should you wish to terminate the agreement after the five-day period, our services will cease. You may terminate at any time without advance notice to Cornerstone Wealth Partners, LLC. Prepaid Financial and Investment Consulting fees are not prorated for refund.

Investment management

Asset management

Your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses. No sales loads are paid to Cornerstone Wealth Partners or any other parties with respect to fund investments. You do not pay any additional fees beyond the mutual fund and ETF expense ratios inside the models for the investments themselves.

Annual fees paid to Cornerstone Wealth Partners are:

Assets Under Management	Annual Fee
$0 - $249,999	1.25%
$250,000 - $999,999	1.00%
$1,000,000 - $4,999,999	0.75%
$5,000,000 and above	0.50%

Fees are negotiable. Accounts within the same household may be combined for a reduced fee.

Workplace retirement plans are charged the same asset-based fees shown above.

Please note, total fees charged will not exceed 2% of assets under management per year. Lower fees for comparable services may be available from other sources.

Annual fees paid to Cornerstone Wealth Partners are collected quarterly, in advance, at one-fourth the annual rate. The fees are based on the market value of your account on the last business day of the preceding calendar quarter. You will find the market value of your account on the statement you receive from the custodian carrying your account. The initial fee is due at the time your account is funded and is pro-rated for the number of days remaining in the quarter. The custodian of your assets will deduct the fees from your account and send those fees to Cornerstone Wealth Partners.

You have the right to terminate your agreement with Cornerstone Wealth Partners without penalty within five (5) business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other. Prepaid fees will be refunded on a pro-rata basis.

Co-advisor

When you participate in a Matson Money program your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses as well as the expenses derived from the underlying mutual funds in which the Matson Funds invest. As adviser to its funds, Matson Money charges fees of .49% on each fund's average daily net assets as described in the prospectus. As a fund of funds, Matson Funds invest in shares of other registered investment companies. Advisers to the underlying funds are paid an advisory fee by each underlying fund they manage. As a result, you bear their asset-based share of the fees and expenses of each underlying fund as well as of the Matson Fund series in which your assets are invested. No sales loads are paid to Matson Money, Cornerstone Wealth Partners, or any other parties with respect to fund investments. You do not pay Matson Money any separate advisory fee above or beyond the fees embedded in the Matson Funds to participate in a Matson Money program.

Annual fees paid to Cornerstone Wealth Partners are:

Assets Under Management	Annual Fee
First $500,000	0.99%
Next $500,000	0.99%
Next $3,000,000	0.75%
Over $4,000,000	0.50%

Fees are negotiable. Accounts within the same household may be combined for a reduced fee.

Please note, total fees charged by both parties will not exceed 3% of assets under management per year. Lower fees for comparable services may be available from other sources.

Annual fees paid to Cornerstone Wealth Partners are collected by Matson Money quarterly in advance, at one-fourth the annual rate. The fees are based on the market value of your account on the last business day of the preceding calendar quarter. You will find the market value of your account on the statement you receive from the custodian carrying your account and on statements provided by Matson Money. The initial fee is due at the time your account is funded and is pro-rated for the number of days remaining in the quarter. The custodian of your assets will deduct the fees from your account and send those fees to Matson Money, who in turn pays Cornerstone Wealth Partners.

Clients who invest in Matson Funds through different co-advisers may pay lower or higher fees to their co-adviser than other investors in the same funds.

Cornerstone Wealth Partners will not, and has no authority to, withdraw fees from your account.

Matson Money receives no part of the fees paid to Cornerstone Wealth Partners.

You have the right to terminate your agreement with Cornerstone Wealth Partners and Matson Money without penalty within five (5) business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other. Prepaid fees will be refunded on a pro-rata basis.

Monitoring college savings plans

If you have engaged Cornerstone Wealth Partners to monitor your Section 529 College Savings Plan there is no fee charged by Cornerstone Wealth Partners on those assets.

Coaching events

As discussed in Item 4, we host coaching events for individuals to uncover important distinctions around money and investing. There is no charge to participants to attend these events. These events are separate from the services offered and are open to the public (clients and non-clients) to attend.

General information

The fees charged are calculated as described above and are not charged based on a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client.

All advisory fees are separate from charges assessed by third parties, such as broker/dealers, custodians, mutual fund companies, etc. Each rebalancing or reallocation of your portfolio may involve transaction charges imposed by the custodian. Brokerage and other transaction costs charged by broker/dealers executing the transactions and custodians maintaining your assets are in addition to the management fees and are non-negotiable. Mutual funds, ETFs, variable annuities or other platforms charge may assess other fees and expenses, such as 12B-1 fees and/or commissions in connection with the placement of your funds into certain investments. Cornerstone Wealth Partners does not receive any of these commissions, charges, and/or fees.

Depending on individual arrangements made, fees paid by one client may be higher or lower than fees paid by another client under similar circumstances. Advice provided by Cornerstone Wealth Partners may differ from one client to another.

Other securities compensation

We do not receive any additional securities compensation.

As established in Item 10 – Other Industry Affiliations, earning commissions for the sale of insurance products creates a conflict of interest. Please see Item 10 for additional details and conflicts of interest associated with the sale of insurance products.

Item 6 – Performance-Based Fees and Side by Side Management

We do not accept performance-based fees, that is, fees based on a share of capital gains or appreciation of the assets of a client. We do not participate in side-by-side management. Side-by-side management refers to the practice of charging performance-based fees for account management while at the same time managing accounts that are not charged performance-based fees.

Item 7 – Types of Clients

We provide our advisory services to individual investors, 401(k) plans, trusts, estates, charitable organizations, and businesses. There is no minimum net worth or minimum portfolio requirement for our services. The issuers of Section 529 College Savings Plans may have investment minimums and other limits.

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

Methods of analysis and investment strategies

Cornerstone Wealth Partners utilizes an academic, evidence-based investing approach to create investment models. These models are reviewed typically on a quarterly basis and rebalanced as needed. Neither Cornerstone Wealth Partners nor Matson Money makes asset allocation decisions based on the conditions of the economy or the market, but rather on historic economic research of various asset classes, how they have performed over time, and the correlation of their performance.

Matson Money investment strategies are dictated by Matson Money within their asset allocation models and underlying mutual funds. Matson Money may use fixed or variable rate annuities in its portfolios as well as life insurance contracts. Asset allocation with quarterly rebalancing is typical but may be more or less frequent depending upon the particular portfolio manager's strategies.

Investment risks

Investing in securities involves risk of loss that you should be prepared to bear. Investment values will fluctuate, are subject to market volatility, and may be worth more or less than original cost. Typically, Cornerstone Wealth Partners and Matson Money will request clients to sell securities in order to make funds available to purchase a Cornerstone Wealth Partners model portfolio or Matson Money's mutual funds. In those situations where there would be adverse tax consequences to a client, Cornerstone Wealth Partners may recommend the client hold the security or sell it over time in a tax efficient manner.

Recommended securities

We generally use mutual funds and exchange traded funds in client portfolios. These funds may hold stocks, bonds and other securities. Some of the risks associated with these investments include:

- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates.
- **International investing risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition,

foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.

- **Manager risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relative to benchmarks or other accounts with a similar investment objective.
- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management.

On January 31, 2024, Cornerstone Wealth Partners, LLC and Evan Vanderwey, 100% owner of Cornerstone Wealth Partners, LLC, paid all fines/penalties and signed a consent order with the California Department of Financial Protection and Innovation.

The consent order concluded that Cornerstone Wealth Partners, LLC and Evan Vanderwey violated Section 25230 of the Corporations Code by engaging in investment advisory business without being licensed or exempt under the CSL between 2020 and 2023. Based on the consent order Cornerstone Wealth Partners and Evan Vanderwey must desist and refrain from further violations of section 25230 of the Corporations Code by engaging in the investment advisory business without being licensed or exempt. Cornerstone Wealth Partners and Evan Vanderwey consented to paying the past due licensing fee of $375 and $15,000 in penalties.

Details of the consent order can be found here: https://dfpi.ca.gov/enf-c/cornerstone-wealth-partners-llc/.

We have no other legal or disciplinary events to report.

Item 10 – Other Financial Industry Activities and Affiliations

Broker dealer affiliation

We are not affiliated with a broker-dealer.

Futures/commodities firm affiliation

We are not affiliated with a futures or commodities broker.

Other industry affiliations

We are required to disclose material relationships that we may have with related financial industry participants. Cornerstone Wealth Partners, LLC is not affiliated with any other financial institution.

Two employees of Cornerstone, in their individual capacities, are also licensed insurance agents, and in such capacity, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. While Cornerstone does not sell such insurance products to its clients, Cornerstone does permit its employees to sell insurance products to their clients. This creates a conflict of interest because Cornerstone's adviser recommends the purchase of insurance products where Cornerstone's employees receive insurance commissions and/or other additional compensation.

Recommendation of third party investment adviser

Cornerstone Wealth Partners may occasionally recommend Matson Money. Other portfolio managers may use similar strategies as Matson Money, may cost more or less than Matson Money, may minimize overall portfolio turnover, or may employ similar investment philosophies. We are required to put your interests before our own. Since, as an investment adviser, we put your interests before our own, we have implemented these procedures to make sure that you benefit from using the recommended portfolio managers: (1) We gather detailed information from you to determine if you will benefit more from using a recommended manager. (2) We review the manager's performance and handling of your portfolios on an ongoing basis. (3) We review other portfolio managers' programs to become familiar with alternatives that may be appropriate for you. We will also ensure that Matson Money is properly registered or exempt from registration in your state of residence prior to making any recommendations.

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

Description

Cornerstone Wealth Partners has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. We will put your interests before our own interests.
2. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
3. We will not make investment decisions for our personal portfolios if the decision is based on information that is not also available to the investing public.
4. We will not participate in private placements or initial public offerings (IPOs) that may affect your investments without disclosure to you.
5. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

The full text of our Code of Ethics is available to you upon request.

Material interest in securities

Neither we nor our related persons have a material interest in any securities.

Investing in or recommending the same securities

We may invest in or recommend the same securities as our clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Joshua VanDyke reviews our personal transactions quarterly to make sure that our personal transactions are consistent with advice given to clients.

Item 12 – Brokerage Practices

Recommendation criteria

Cornerstone Wealth Partners will require the use of a particular custodial broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by Cornerstone Wealth Partners involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the custodial broker-dealer, the value of an ongoing relationship and the financial strength and stability of the custodial broker-dealer. Cornerstone Wealth Partners will select an appropriate custodial broker-dealer based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Cornerstone Wealth Partners relies on its custodial broker-dealer to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for all custodial fees in addition to the advisory fee charged by Cornerstone Wealth Partners. Cornerstone Wealth Partners does not receive any portion of the trading fees. Typically, Cornerstone Wealth Partners will require the use of Altruist Financial.

Research and soft dollars

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services.

Brokerage for client referrals

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

Directed brokerage

Some clients may direct us to a specific broker-dealer to execute securities transactions for their accounts. When so directed, we may not be able to effectively negotiate lower brokerage commissions or achieve best execution on those clients' transactions. This can result in substantially higher fees, charges or dealer concessions in one or more transactions for the clients' accounts because we cannot negotiate favorable prices.

Trade aggregation

We do not aggregate trades for client accounts.

Item 13 – Review of Accounts

Periodic reviews

Our Investment Adviser Representatives continuously monitor their client accounts and conduct annual reviews or as often as requested by the client to provide any updates as necessary. Third party portfolio managers, such as Matson Money, also monitor accounts daily for trading and rebalancing purposes.

Other reviews

Additional reviews are conducted periodically depending on market conditions, economic or political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

Reports

The mutual fund managers and/or the brokerage firm handling your account will send you account statements at least quarterly. These account statements show money balances, investment values, and transactions. Account activity, positions, and account balances are available for view 24 hours a day on Altruist's and Matson Money's websites.

Item 14 – Client Referrals and Other Compensation

Cornerstone Wealth Partners is paid advisory fees on clients participating in one of the programs offered by Matson Money. These are more fully described above under "Fees and Compensation". Matson Money also provides marketing assistance to Cornerstone Wealth Partners. While Matson Money generally charges for marketing assistance, some marketing assistance may be provided without charge. Matson Money may provide its investment advisory services to persons working for Cornerstone Wealth Partners at low or no cost and at reduced costs to their family members. While this factor does not change the amount of fees paid by you, these benefits could represent incentives for us to recommend Matson Money over other third party managers. See "Other Financial Industry Activities and Affiliations" above for a description of our procedures addressing potential conflicts when recommending Matson Money.

Dinner Events – Clients may bring guests to a periodic customer appreciation or investor coaching dinner event. If the guest becomes our client, it could be construed that the client bringing the guest was compensated by a meal.

Item 15 – Custody

All client funds, securities, and accounts are held with Third-Party Custodians. Cornerstone is deemed to have custody over a client's assets when it is authorized to directly debit a client's account for payment of the Firm's management fee. We do not accept securities or forward securities to your custodian. The only checks payable to Cornerstone Wealth Partners that we accept are those payable for an individual financial planning agreement.

At least quarterly, you will receive account statements and other reports from your custodian. Clients are encouraged to carefully review their custodial statements. To the extent that Cornerstone would provide any periodic statement or report, the client is urged to compare any statement or report provided by Cornerstone with the account statement received from the custodian.

Item 16 – Investment Discretion

Cornerstone Wealth Partners requires discretionary authority to manage securities accounts on behalf of clients. Cornerstone Wealth Partners has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

When you participate in a Matson Money program, Matson Money exercises discretionary authority to manage investments on your behalf. Typically, you grant Matson Money a limited power of attorney for investment purposes. These powers do not provide Matson Money with a general power of attorney to access your custodial accounts. In addition, Matson Money Investment Management Agreements do not provide Cornerstone Wealth Partners with any authority to access, or to make or direct transactions in, your accounts. Matson Money may, at its sole discretion, terminate its management if you provide us with more expansive authority, such as trustee powers, over the Matson Money-managed account(s).

Item 17 – Voting Client Securities

Cornerstone Wealth Partners does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

Cornerstone Wealth Partners will not provide recommendations.

Item 18 – Financial Information

Balance sheet

We do not require or solicit prepayment of more than $1200 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

Financial condition

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service our clients.

Bankruptcy

We have not been the subject of a bankruptcy proceeding.