

Item 1: Cover Page

TruNorth Capital Management, L.L.C.
1090 North 10th Street, Suite 210
Kalamazoo, MI 49009
877-469-0446
www.trunorthcapital.com

Brian J. Mullally
CRD# 6124884

This Brochure Supplement provides information about Brian J. Mullally that supplements the TruNorth Capital Management, L.L.C. brochure. You should have received a copy of that brochure. If you did not receive TruNorth Capital Management, L.L.C.'s Form ADV 2A Brochure or if you have any questions about the contents of this supplement, please contact us via one of the methods provided above. Registration does not imply a certain level of skill or training.

Additional information about Brian J. Mullally is available on the SEC's website at www.adviserinfo.sec.gov.

January 27, 2025

Item 2: Educational Background and Business Experience – Brian J. Mullally, Esq.

Mr. Mullally was born in 1972 and graduated from Georgetown University in 1995 with a bachelor's degree in Foreign Service, majoring in International Economics / Finance and Commerce.

After graduation from Georgetown, Mr. Mullally joined Goldman Sachs & Co. in New York City as a Financial Analyst where he provided quantitative portfolio accounting and risk management services to domestic and international trading desks. He left Goldman in 1997 to attend the University of Notre Dame, where he graduated with a dual graduate degree in law (juris doctor) and an MBA with honors in 2001.

Mr. Mullally joined Greenleaf Trust in 2001, where he held varying degrees of ascending portfolio management and client relationship responsibilities, including Junior Research Analyst, Research Analyst, and Vice President and Trust Relationship Officer. In 2007 Mr. Mullally became the CEO and Co-Founder of GlobeFunder Ventures, Inc., a financial technology start-up. In 2012, Mr. Mullally co-founded TruNorth Capital Management, L.L.C., where he is actively engaged in investment research and managing client investment portfolios as Member. As of May 1, 2021, he continues to provide leadership as an owner and is a Relationship Manager for the firm. Mr. Mullally held the titles of CEO and Chief Investment Officer through December 2022.

A member of the State Bar of Michigan and licensed to practice law, Mr. Mullally is a 2004 graduate of the American Bankers Association National Trust School and a 2006 honors graduate of the National Graduate Trust School. Mr. Mullally passed the Series 65 Investment Adviser Law exam as required for registration as an Investment Adviser Representative.

Item 3: Disciplinary Information

Mr. Mullally's registration records do **not** contain information that would be material to a client's or prospective client's evaluation of Mr. Mullally or the integrity of his practice. Mr. Mullally **has never** been involved in any of the following matters:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the supervised person:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business (b) barring or suspending the supervised person's association with an investment-related business (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

Disclosure background for investment adviser representatives can be located via the SEC's investment adviser public disclosure search site at: www.adviserinfo.sec.gov.

Item 4: Other Business Activities

Mr. Mullally is involved in other business activities primarily in the development and management of real-estate properties. These activities do not conflict with the business activities of TruNorth Capital Management, L.L.C. The time spent may vary throughout the year but may account for approximately 90% of Mr. Mullally's time thereby limiting his day-to-day activities with TruNorth Capital Management, L.L.C.

Item 5: Additional Compensation

Other than compensation paid via TruNorth Capital Management L.L.C., Mr. Mullally does not receive any economic benefit from any other person, company, or organization, either directly or indirectly, in exchange for providing clients with advisory services.

Mr. Mullally's primary compensation and economic benefit comes from his ownership interest in TruNorth Capital Management, L.L.C. and the unaffiliated real-estate activities noted in Item 4.

As a Member of TruNorth Capital Management, L.L.C., he is eligible for the company's equity-based compensation program, which provides additional economic incentives for investment adviser representatives. While this program does not tie rewards to individual performance, it does create potential conflicts of interest. Since Mr. Mullally holds equity in TruNorth Capital Management, he may be incentivized to make investment decisions that benefit the company rather than focusing solely on client interests. This could include recommending that clients add more assets to managed accounts, open new accounts, or maintain higher levels of assets in their accounts. Clients maintain full discretion to follow or disregard any recommendations, whether partially or entirely. Further, in all cases, TruNorth Capital Management is a fiduciary to each client and the Adviser has established account review procedures that have been designed and implemented to ensure the Adviser meets its fiduciary obligations to clients.

Item 6: Supervision

Mr. Mullally, as an owner and a relationship manager of TruNorth Capital Management, L.L.C., has a vested interest in the firm's business and compliance activities. Kevin Miller, President, CEO, and Chief Compliance Officer, supervises all of the Adviser's activities. TruNorth Capital Management, L.L.C. takes the issues of fiduciary duty, ethics, and compliance seriously. The firm maintains regularly updated written policies and procedures and its supervisory system establishes clear lines of authority, accountability, and responsibility. Clients are welcome to contact Mr. Miller with questions or concerns in connection with the firm's services, staff monitoring, confidentiality and data protection, and its internal compliance program. Mr. Miller's contact information is listed on the cover page of TruNorth Capital Management's Form ADV Part 2A and ADV 2B.

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Kevin L. Miller
CRD# 4861915

This Brochure Supplement provides information about Kevin L. Miller that supplements the TruNorth Capital Management, L.L.C. brochure. You should have received a copy of that brochure. If you did not receive TruNorth Capital Management, L.L.C.'s Form ADV 2A Brochure or if you have any questions about the contents of this supplement, please contact us via one of the methods provided above. Registration does not imply a certain level of skill or training.

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

January 27, 2025

Item 2: Educational Background and Business Experience

Kevin L Miller

Mr. Miller was born in 1982 and graduated from Western Michigan University in 2005 with a bachelor's degree in Business Administration majoring in Finance and Accounting.

After graduation, Mr. Miller joined Plante Moran Financial Advisors (PMFA) in June 2005 as a staff member in their Kalamazoo, Michigan office. In his early years at PMFA he focused on supporting the existing wealth management practice as well as developing his technical skills in the areas of financial planning.

In 2007 Mr. Miller became a licensed Certified Public Accounting (CPA) in the State of Michigan. In 2009, Mr. Miller received his Certified Financial Planner (CFP®) certification. Professionals carrying the CFP® certification have completed extensive training and experience requirements and are held to rigorous ethical standards. In the same year, Mr. Miller was promoted to Associate at PMFA to recognize his contributions to managing client relationships and excellence in financial planning.

In 2012 Mr. Miller transferred to PMFA's Chicago, Illinois office to assist with the Plante Moran merger. While in Chicago, Kevin focused on training staff and helping establish the groundwork for the new wealth management practice. In 2014, Mr. Miller received his Certified Private Wealth Advisor (CPWA®) designation which expands on the complexities many families face when creating their financial goals. After nearly two years in Chicago, Mr. Miller relocated to Kalamazoo Michigan. In 2015, Mr. Miller was promoted to Relationship Manager which recognizes his client service capabilities, client management skills, and managing a team of professionals.

In February 2019, Mr. Miller joined TruNorth Capital Management, L.L.C. as partner and as a Vice President where he is actively engaged in client service activities, investment strategy development, technology interface, and business development. Effective May 1, 2021, Mr. Miller was promoted to President and CEO and in January 2023, was named Chief Compliance Officer.

INFORMATION ABOUT THE CFP® DESIGNATION

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to obtain the certification. It is recognized in the United States (U.S.) 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.

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 U.S. 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 exam, administered in 10 hours over a 2-day period, 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 Agreement – 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.
- ❖ Continuing Education – Individuals who become certified must complete ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks. This includes: 30 hours of continuing education 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
- ❖ Ongoing Ethics Requirement – Individuals who become certified must renew an agreement to be bound by the *Standards of Professional Conduct*, as required. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® Professionals must provide 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® certification.

Note: 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”).

INFORMATION ABOUT THE CPA LICENSE

The requirements to obtain a Certified Public Accountant (CPA) license vary by state. CPAs are licensed by the state board of accountancy. Applicants must meet educational and experience requirements as well as pass the required uniform examination. Additionally, licensees must comply with continuing professional education requirements. Additional information about licensing requirements is available via State of Michigan’s Department of Licensing and Regulatory Affairs (LARA) web site <https://aca-prod.accela.com/MILARA/GeneralProperty/PropertyLookUp.aspx?isLicensee=Y&TabName=APO> 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.

INFORMATION ABOUT THE CERTIFIED PRIVATE WEALTH ADVISOR (CPWA®) DESIGNATION

The CPWA® designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on private wealth management topics and strategies for high-net-worth clients. The designation is administered through The Investments & Wealth Institute (“IWI”) formerly known as the Investment Management Consultants Association. Prerequisites for the CPWA® designation are a bachelor’s degree from an

accredited college or university or one of the following designations or licenses: CIMA[®], CIMC[®], CFA[®], CFP[®], ChFC[®], or CPA license; have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and five years of professional client centered experience in financial services or a related industry. CPWA[®] designees have completed a rigorous educational process that includes self-study requirements, an in-class education component, and successful completion of a comprehensive examination. CPWA[®] designees are required to adhere to the institute's Code of Professional Responsibility and Rules and Guidelines for Use of the Marks. CPWA[®] designees must report 40 hours of continuing education credits, including two ethics hours, every 2 years to maintain the certification.

Item 3: Disciplinary Information

Mr. Miller's registration records do **not** contain information that would be material to a client's or prospective client's evaluation of Mr. Miller or the integrity of his practice. Mr. Miller **has never** been involved in any of the following matters:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the supervised person:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business (b) barring or suspending the supervised person's association with an investment-related business (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or

2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

Disclosure background for investment adviser representatives can be located via the SEC's investment adviser public disclosure search site at: www.adviserinfo.sec.gov.

Item 4: Other Business Activities

Mr. Miller is not engaged in any other investment-related business. Mr. Miller teaches CPA continuing education courses for Surgent CPE in the capacity of an independent contractor. This activity generally involves less than 50 hours annually. Mr. Miller is compensated on an hourly basis, receives discounted CPE courses for his professional designations, and can apply teaching hours to professional continuing education credits.

Item 5: Additional Compensation

Other than compensation paid via TruNorth Capital Management L.L.C., Mr. Miller does not receive any economic benefit from any other person, company or organization, either directly or indirectly, in exchange for providing clients with advisory services. As a Member of TruNorth Capital Management, L.L.C., he is eligible for the company's equity-based compensation program, which provides additional economic incentives for investment adviser representatives. While this program does not tie rewards to individual performance, it does create potential conflicts of interest. Since Mr. Miller holds equity in TruNorth Capital Management, he may be incentivized to make investment decisions that benefit the company rather than focusing solely on client interests. This could include recommending that clients add more assets to managed accounts, open new accounts, or maintain higher levels of assets in their accounts. Clients maintain full discretion to follow or disregard any recommendations, whether partially or entirely. Further, in all cases, TruNorth Capital Management is a fiduciary to each client and the Adviser has established account review procedures that have been designed and implemented to ensure the Adviser meets its fiduciary obligations to clients.

Item 6: Supervision

Mr. Miller, President, CEO and Chief Compliance Officer of TruNorth Capital Management, L.L.C., supervises all of the Adviser's activities. TruNorth Capital Management, L.L.C. takes the issues of fiduciary duty, ethics, and compliance seriously. The firm maintains regularly updated written policies and procedures and its supervisory system establishes clear lines of authority, accountability, and responsibility. Clients are welcome to contact Mr. Miller with questions or concerns in connection with the firm's services, staff monitoring, confidentiality and data protection, and its internal compliance program. Mr. Miller's contact information is listed on the cover page of TruNorth Capital Management's Form ADV Part 2A and ADV 2B.

Item 1: Cover Page

TruNorth Capital Management, L.L.C.
1090 North 10th Street, Suite 210
Kalamazoo, MI 49009
877-469-0446
www.trunorthcapital.com

1015 Breton Rd., S.E.
East Grand Rapids, MI 49506
877-469-0446

Jean-Claude (JC) Morisset
CRD# 6038678

This Brochure Supplement provides information about Jean-Claude (JC) Morisset that supplements the TruNorth Capital Management, L.L.C. brochure. You should have received a copy of that brochure. If you did not receive TruNorth Capital Management, L.L.C.'s Form ADV 2A Brochure or if you have any questions about the contents of this supplement, please contact us via one of the methods provided above. Registration does not imply a certain level of skill or training.

Additional information about Jean-Claude (JC) Morisset is available on the SEC's website at www.adviserinfo.sec.gov.

January 27, 2025

Item 2: Educational Background and Business Experience

JC Morisset

Mr. Morisset was born in 1989 and graduated from Grand Valley State University in 2011 with a bachelor's degree in Business Administration, majoring in Finance. After graduating from Grand Valley State, Mr. Morisset joined Stifel Nicolaus in Grand Rapids, Michigan as a Client Service Associate where he actively engaged in client service activities and supported a team of internal Financial Advisors. He left Stifel in 2014 to join Plante Moran Financial Advisors (PMFA) as an Operations Team member in their Grand Rapids, Michigan office. In 2015, Mr. Morisset transferred to a Client Service role directly assisting clients with ongoing needs and account related inquiries. In 2018, Mr. Morisset was promoted to a Senior Operations role which recognizes his leadership qualities and client service capabilities. Mr. Morisset passed the Series 65 Investment Adviser Law exam as required for registration as an Investment Adviser Representative.

In April 2022, Mr. Morisset joined TruNorth Capital Management, L.L.C. as a Client Service Specialist, where he is actively engaged in client service activities and the ongoing maintenance and development of their technology interface. In December of 2024, Mr. Morisset became an equity Member of TruNorth Capital Management and was named Director of Investment Operations.

Item 3: Disciplinary Information

Mr. Morisset's registration records do **not** contain information that would be material to a client's or prospective client's evaluation of Mr. Morisset or the integrity of his practice. Mr. Morisset **has never** been involved in any of the following matters:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the supervised person:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or

2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business (b) barring or suspending the supervised person's association with an investment-related business (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event. Disclosure background for investment adviser representatives can be located via the SEC's investment adviser public disclosure search site at: www.adviserinfo.sec.gov.

Item 4: Other Business Activities

Mr. Morisset is not engaged in any other investment-related business or occupation.

Item 5: Additional Compensation

Other than compensation paid via TruNorth Capital Management L.L.C., Mr. Morisset does not receive any economic benefit from any other person, company, or organization, either directly or indirectly, in exchange for providing clients with advisory services. As a Member of TruNorth Capital Management, L.L.C., he is eligible for the company's equity-based compensation program, which provides additional economic incentives for investment adviser representatives. While this program does not tie rewards to individual performance, it does create potential conflicts of interest. Since Mr. Morisset holds equity in TruNorth Capital Management, he may be incentivized to make investment decisions that benefit the company rather than focusing solely on client interests. This could include recommending that clients add more assets to managed accounts, open new accounts, or maintain higher levels of assets in their accounts. Clients maintain full discretion to follow or disregard any recommendations, whether partially or entirely. Further, in all cases, TruNorth Capital Management is a fiduciary to each client and the Adviser has established account review procedures that have been designed and implemented to ensure the Adviser meets its fiduciary obligations to clients.

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TruNorth Capital Management, L.L.C.
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www.trunorthcapital.com

Kristin M. Bennett
CRD# 5744787

This Brochure Supplement provides information about Kristin M. Bennett that supplements the TruNorth Capital Management, L.L.C. brochure. You should have received a copy of that brochure. If you did not receive TruNorth Capital Management, L.L.C.'s Form ADV 2A Brochure or if you have any questions about the contents of this supplement, please contact us via one of the methods provided above. Registration does not imply a certain level of skill or training.

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

January 27, 2025

Item 2: Educational Background and Business Experience

Kristin M. Bennett

Ms. Bennett was born in 1984 and graduated from Albion College in 2006 with a bachelor's degree in economics and management.

Ms. Bennett joined Plante Moran Financial Advisors (PMFA) in June 2006 as a financial planner in their Portage, Michigan office. In her early years at PMFA she focused on supporting the existing wealth management practice as well as developing her technical skills in the areas of financial planning. In 2011, Ms. Bennett was promoted to Associate at PMFA in recognition of her contributions to managing client relationships and excellence in financial planning. In 2016, Ms. Bennett was promoted to Relationship Manager in recognition of her client service capabilities, client management skills, and managing a team of professionals.

Ms. Bennett joined Greenleaf Trust in January 2020 through August 2023 as vice president, assistant director of wealth management in their Kalamazoo, Michigan office. She helped lead the wealth management team and specialized in the development of comprehensive wealth management plans, execution of goal-based strategies, and the management of client investment portfolios.

In August 2023, Ms. Bennett joined TruNorth Capital Management, L.L.C. as a relationship manager and is registered as an investment adviser representative. Ms. Bennett is actively engaged in client service activities, operational management, and business development. In December 2024, Ms. Bennett became an equity Member of TruNorth Capital Management and was named Chief Operating Officer.

Certifications

In 2009, Ms. Bennett received the Certified Financial Planner (CFP®) certification. Professionals carrying the CFP® certification have completed extensive training and experience requirements and are held to rigorous ethical standards.

In 2016, Ms. Bennett received the Certified Private Wealth Advisor® (CPWA®) designation. The CPWA® certification is an advanced professional certification for advisers who serve high-net-worth clients. It's designed for seasoned professionals who seek the latest, most advanced knowledge and techniques to address the sophisticated needs of clients with a minimum net worth of \$5 million.

INFORMATION ABOUT THE CFP® DESIGNATION

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to obtain the certification. It is recognized in the United States (U.S.) and a number of other countries for its:

4. high standard of professional education
5. stringent code of conduct and standards of practice; and
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and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning

- ❖ Examination – Pass the comprehensive CFP® Certification Examination. The exam, administered in 10 hours over a 2-day period, 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 Agreement – 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.
- ❖ Continuing Education – Individuals who become certified must complete ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks. This includes: 30 hours of continuing education 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
- ❖ Ongoing Ethics Requirement – Individuals who become certified must renew an agreement to be bound by the *Standards of Professional Conduct*, as required. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® Professionals must provide 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® certification.

Note: 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”).

INFORMATION ABOUT THE CERTIFIED PRIVATE WEALTH ADVISOR (CPWA®) DESIGNATION

The CPWA® designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on private wealth management topics and strategies for high-net-worth clients. The designation is administered through The Investments & Wealth Institute (“IWI”) formerly known as the Investment Management Consultants Association. Prerequisites for the CPWA® designation are a bachelor’s degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, CFA®, CFP®, ChFC®, or CPA license; have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and five years of professional client centered experience in financial services or a related industry. CPWA® designees have completed a rigorous educational process that includes self-study requirements, an in-class education component, and successful completion of a comprehensive examination. CPWA® designees are required to adhere to the institute’s Code of Professional Responsibility and Rules and Guidelines for Use of the Marks. CPWA® designees must report 40 hours of continuing education credits, including two ethics hours, every 2 years to maintain the certification.

Item 3: Disciplinary Information

Kristin Bennett's registration records do **not** contain information that would be material to a client's or prospective client's evaluation of Ms. Bennett or the integrity of her practice. Ms. Bennett **has never** been involved in any of the following matters:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the supervised person:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business (b) barring or suspending the supervised person's association with an investment-related business (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication

(and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

Disclosure background for investment adviser representatives can be located via the SEC's investment adviser public disclosure search site at: www.adviserinfo.sec.gov.

Item 4: Other Business Activities

Kristin Bennett is not engaged in any other investment-related business or occupation.

Item 5: Additional Compensation

Other than compensation paid via TruNorth Capital Management L.L.C., Ms. Bennett does not receive any economic benefit from any other person, company or organization, either directly or indirectly, in exchange for providing clients with advisory services. As a Member of TruNorth Capital Management, L.L.C., she is eligible for the company's equity-based compensation program, which provides additional economic incentives for investment adviser representatives. While this program does not tie rewards to individual performance, it does create potential conflicts of interest. Since Ms. Bennett holds equity in TruNorth Capital Management, she may be incentivized to make investment decisions that benefit the company rather than focusing solely on client interests. This could include recommending that clients add more assets to managed accounts, open new accounts, or maintain higher levels of assets in their accounts. Clients maintain full discretion to follow or disregard any recommendations, whether partially or entirely. Further, in all cases, TruNorth Capital Management is a fiduciary to each client and the Adviser has established account review procedures that have been designed and implemented to ensure the Adviser meets its fiduciary obligations to clients.

Item 6: Supervision

Mr. Miller, President, CEO and Chief Compliance Officer of TruNorth Capital Management, L.L.C., supervises all of the Adviser's activities. TruNorth Capital Management, L.L.C. takes the issues of fiduciary duty, ethics, and compliance seriously. The firm maintains regularly updated written policies and procedures and its supervisory system establishes clear lines of authority, accountability, and responsibility. Clients are welcome to contact Mr. Miller with questions or concerns in connection with the firm's services, staff monitoring, confidentiality and data protection, and its internal compliance program. Mr. Miller's contact information is listed on the cover page of TruNorth Capital Management's Form ADV Part 2A and ADV 2B.