

Dated January 23, 2024

XY Investment Solutions, LLC (hereinafter "XYPN Invest") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

XYPN Sapphire Program: We offer discretionary investment management and financial planning services to retail investors through our XYPN Sapphire Program. We monitor your account on an ongoing basis and review your account on at least an annual basis. However, you are encouraged to reach out to us to discuss any changes in your personal or financial situations. In order to effectively manage your investments, you will be required to provide us with discretionary authority. You may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by us. Our advice is not limited to certain types of investments, and we do not offer proprietary products. We do not require a minimum account value to open or maintain an account.

XYPN Invest Program: We offer investment management services to retail investors through independent and unaffiliated registered investment advisers (your "Independent Adviser"), to whom we construct and manage discretionary model investment portfolios ("Model Portfolios"). The Model Portfolios are monitored regularly and updated when appropriate. We monitor the Model Portfolios on a continuous basis but do not conduct regular reviews of your specific accounts. Model Portfolio reviews are conducted by our financial professionals and East Bay Financial Services LLC ("East Bay")—an independent and unaffiliated registered investment adviser we've retained to support us with Model Portfolio creation, management, and investment research. You should review Item 13 of your registered investment adviser's Form ADV Part 2A to understand their account review practices and contact them directly if you have any questions. Your Independent Adviser is responsible for choosing the specific Model Portfolio(s) to be implemented in your account(s). In order for us to manage your accounts through your Independent Adviser, you will generally be required to complete a limited power of attorney and/or new account paperwork at the qualified custodian that enables us to implement the Model Portfolio(s) account(s) on behalf of the registered investment adviser with whom you work. We do not offer proprietary products. There are no minimum requirements for retail investors or their registered investment advisers to open or maintain an account or establish a relationship with us. You may be subject to any minimums of your registered investment adviser, if applicable, as disclosed in Item 7 of their Form ADV Part 2A. you may impose reasonable restrictions on our discretionary authority, which must be provided to us in writing and accepted by us.

For Additional Information regarding the services we make available to you, please review [Items 4 and 7 of our Form ADV Part 2A](https://adviserinfo.sec.gov/firm/brochure/285967), available at <https://adviserinfo.sec.gov/firm/brochure/285967>.

Conversation Starters:

"Given my financial situation, should I choose an investment advisory service? Why or why not?"

"How will you choose investments to recommend to me?"

"What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"

What fees will I pay?

XYPN Sapphire Program: We are compensated for our advisory services by fees charged based on a client's assets under management with us, flat fees, or hourly fees (or a combination thereof). Asset-based fees generally range up to 1.5% per annum, flat fees generally range up to \$10,000 per annum, and hourly fees generally range up to \$450 per hour. Fees are negotiable, and each client's specific fee schedule is included as part of the investment advisory agreement, which will also include details specific to each client, including (i) whether fees are calculated and owed in advance or in arrears, (ii) the frequency of such fees (i.e., monthly or quarterly), (iii) whether fees are deducted automatically from the client's account or whether the client may elect to be billed separately, (iv) the fee calculation methodology (i.e., the last day of a specified period or the average daily balance during a specified period), and (v) whether we will bear the costs of certain services performed by third parties and facilitated by us, such as tax preparation.

XYPN Invest Program: If your Independent Adviser has elected to pass through our advisory fee to you, you as the retail investor will incur an annual asset-based fee that ranges from 0.25% to 0.35% of your Independent Adviser's aggregate assets designated to be under our management. Your Independent Adviser may alternatively elect to pay our advisory fee on your behalf. Fees are automatically deducted from your account(s) pursuant to the fee billing mechanics described in your Independent Adviser's Form ADV Part 2A, Item 5.

WEBSITE

xyplanningnetwork.com/invest

PHONE

360.301.7579

ADDRESS

24 E Main St
Bozeman, MT 59715

Form CRS Relationship Summary

In addition to our fees, you may incur additional fees and costs related to the investments in your account, such as your Independent Adviser's fees, custodian fees, transaction costs, internal management fees of mutual funds and ETFs, and other potential product related fees such as redemption fees. Clients may also incur fees for services performed by third parties and facilitated by us, such as tax preparation.

Since we charge an asset-based fee, the more of your assets that are designated to be under our management, the more you will pay in fees if your Independent adviser has elected to pass our advisory fee on to you. In such instances, we have an incentive to encourage you to increase the assets designated to be under our management, and to encourage your Independent Adviser to designate more of its clients assets to be under our management.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees and costs may be found in [Item 5 of our Form ADV Part 2A](#).

Conversation Starter:

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

The custodians we recommend provide us with various products and services that are intended to directly benefit you, us, or both of us. To the extent a custodian provides us products or services that don't directly benefit you, this creates an incentive to recommend that custodian. To learn how we address this incentive, please refer to [Item 12 of our ADV Part 2A](#).

Conversation Starter:

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals who provide direct investment advice to retail investors receive a portion of the fees we obtain from you for the provision of our services. All other financial professionals are compensated on a salary basis and are not paid commissions or other compensation based on the amount of the business generated from their work.

Do you or your financial professionals have legal or disciplinary history?

No. You can visit [investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Conversation Starter:

As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional and up-to-date information about our investment management services and request a copy of the relationship summary by visiting <https://www.xyplanningnetwork.com/invest>, emailing support@xyinvestmentsolutions.com, or calling (360) 301-7579.

Conversation Starter:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

WEBSITE

[xyplanningnetwork.com/invest](https://www.xyplanningnetwork.com/invest)

PHONE

360.301.7579

ADDRESS

24 E Main St
Bozeman, MT 5971

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Item 4: Advisory Business

A. XY Investment Solutions, LLC (the “Adviser,” “we,” “us,” or “our”) is an investment adviser founded in 2016, registered with the U.S. Securities and Exchange Commission (“SEC”) since 2020, and principally owned by XY Planning Network, Inc.

B. Adviser offers the following types of advisory services:

- i. Discretionary Investment Management. Adviser provides ongoing discretionary investment management services to its clients based upon each client’s current financial condition, goals, risk tolerance, income, liquidity requirements, investment time horizon, and other information that is relevant to the management of clients’ account(s). This information will then be used to make investment decisions that reflect clients’ individual needs and objectives on an initial and ongoing basis. Adviser’s investment decisions will allocate portions of clients’ account(s) to various asset classes classified according to historical and projected risks and rates of return. Adviser will retain the discretion to buy, sell, or otherwise transact in securities and other investments in a client’s accounts without first receiving the client’s specific approval for each transaction. Such discretionary authority is granted by a client in his or her investment management agreement with Adviser. Clients may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by Adviser.

Adviser generally implements its investments strategy by allocating clients’ investable assets across a diversified risk-based portfolio, which may include assets such as no-load mutual funds and/or exchange traded funds (“ETFs”), stocks, bonds, certificates of deposit, municipal securities, U.S. Government securities, money market funds, and real estate investment trusts (“REITs”). This portfolio is rebalanced periodically to remain in-line with the client’s agreed-upon asset allocation, though the asset allocation may be changed from time to time based on changes to a client’s specific situation. Clients may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by Adviser.

- ii. Financial Planning. When rendering financial planning services (which may be provided either in connection with investment management services or as a standalone service), Adviser will evaluate and make recommendations with respect to various financial planning topics that are relevant to a particular client. Such topics can include, for example, retirement planning, education savings, cash flow management, debt reduction, estate planning, insurance needs, risk mitigation, tax planning, charitable giving strategies, and/or financial goal tracking. Implementation of Adviser's recommendations will be at the discretion of the client. Adviser may also facilitate tax preparation services for clients by a third-party, the cost of which will either be borne by the client or Adviser, as provided in the client's investment advisory agreement.

When rendering financial planning services, a conflict exists between Adviser's interests and the interests of its clients; clients are under no obligation to act upon Adviser's financial planning recommendations. If a client elects to act on any of the recommendations made by Adviser, the client is under no obligation to effect the transaction through Adviser or any of its personnel.

- C. Adviser tailors its advisory services to the individual needs of its clients by taking the time to understand clients' current financial condition, goals, risk tolerance, income, liquidity requirements, investment time horizon, and other information that is relevant to the management of clients' account(s). This information will then be used to make investment decisions or recommendations that reflect clients' individual needs and objectives on an initial and ongoing basis. Adviser's recommendations will allocate portions of clients' account(s) to various asset classes classified according to historical and projected risks and rates of return. Clients may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by Adviser.
- D. Adviser does not participate in any wrap fee programs.
- E. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code (the "Code"), as applicable, which are laws governing retirement accounts. The

way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- i. Meet a professional standard of care when making investment recommendations (give prudent advice);
- ii. Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- iii. Avoid misleading statements about conflicts of interest, fees, and investments;
- iv. Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- v. Charge no more than is reasonable for our services; and
- vi. Give you basic information about conflicts of interest.

F. Adviser manages the following amount of discretionary and non-discretionary client assets calculated as of 12/31/23:

- i. Discretionary: \$132,965,909
- ii. Non-Discretionary: \$0
- iii. Total: \$132,965,909

It should be noted that the reported amounts are inclusive of Adviser's total client assets as of December 31, 2023 and do not include any assets attributable to XYPN Sapphire, which only commenced in 2024.

Item 5: Fees and Compensation

- A. Adviser is compensated for its advisory services by fees charged on a percentage of client's assets under management with Adviser, flat fees, hourly fees, or a combination thereof. Asset-based fees generally range up to 1.5% per annum, flat fees generally range up to \$10,000 per annum, and hourly fees generally range up to \$450 per hour. Fees are negotiable, and each client's specific fee schedule is included as part of the investment advisory agreement signed by Adviser and the client. The investment advisory agreement will also include details specific to each client, including (i) whether fees are calculated and owed in advance or in arrears, (ii) the frequency of such fees (i.e., monthly or quarterly), (iii) whether fees are deducted automatically from the client's account or whether the client may elect to be billed separately, (iv) the fee calculation methodology (i.e., the last day of a specified period or the average daily balance during a specified period), and (v) whether Adviser will bear the costs of certain services performed by third parties and facilitated by Adviser, such as tax preparation.
- B. In addition to the fees charged by Adviser, clients will incur brokerage and other transaction costs. Please refer to Item 12: Brokerage Practices, for further information on such brokerage and other transaction-related practices. Clients will also typically incur additional fees and expenses imposed by independent and unaffiliated third-parties, which can include qualified custodian fees, mutual fund or exchange traded fund fees and expenses, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, check-writing fees, early-redemption charges, certain deferred sales charges on previously-purchased mutual funds, margin fees, charges or interest, IRA and qualified retirement plan fees, and other fees and taxes on brokerage accounts and securities transactions. These additional charges are separate and apart from the fees charged by Adviser. Clients may also incur fees for services performed by third parties and facilitated by Adviser, such as tax preparation.
- C. If Adviser or client terminates the advisory agreement before the end of a billing period, Adviser's fees will be prorated through the effective date of the termination. The pro rata fees for the remainder of the quarterly billing period after the termination will be refunded to the client, if fees are paid in advance. For clients that are billed in arrears, the pro rata fees earned through the effective date of the termination will be billed to the client.

D. Neither Adviser nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

Item 6: Performance-Based Fees & Side-By-Side Management

Neither Adviser nor any of its supervised persons accepts performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Neither Adviser nor any of its supervised persons engage in side-by-side management.

Item 7: Types of Clients

Adviser generally provides its services to individuals, high-net-worth individuals, trusts, estates, business entities, and charitable organizations, and pension and profit sharing plans. Adviser does not require a minimum account value to open or maintain an account.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

- A. The investment strategies used by Adviser when formulating investment advice or managing assets include long-term investment strategies incorporating the principles of Modern Portfolio Theory, and the investment philosophy is designed for investors who desire a “buy and hold” strategy. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance does not guarantee future returns.
- B. Like any investment strategy, Modern Portfolio Theory involves material risks. Such material risks are described in further detail below:
- i. Investing for the long term means that a client’s account will be exposed to short-term fluctuations in the market and the behavioral impulse to make trading decisions based on such short-term market fluctuations. Adviser does not condone short-term trading in an attempt to “time” the market, and instead coaches clients to remain committed to their financial goals. However, investing for the long term can expose clients to risks borne out of changes to interest rates, inflation, general economic conditions, market cycles, geopolitical shifts, and regulatory changes.
 - ii. Inflation risk is the risk that the value of a client’s portfolio will not appreciate at least in an amount equal to inflation over time. General micro- and macro-economic conditions may also affect the value of the securities held in a client’s portfolio, and general economic downturns can trigger corresponding losses across various asset classes and security types. Market cycles may cause overall volatility and fluctuations in a portfolio’s value, and may increase the likelihood that securities are purchased when values are comparatively high and/or that securities are sold when values are comparatively low. Geopolitical shifts may result in market uncertainty, lowered expected returns, and general volatility in both domestic and international securities. Regulatory changes may have a negative impact on capital formation and increase the costs of doing business, and therefore result in decreased corporate profits and corresponding market values of securities.

- iii. Investing in mutual funds does not guarantee a return on investment, and shareholders of a mutual fund may lose the principal that they've invested into a particular mutual fund. Mutual funds invest into underlying securities that comprise the mutual fund, and as such clients are exposed to the risks arising from such underlying securities. Mutual funds charge internal expenses to their shareholders (which can include management fees, administration fees, shareholder servicing fees, sales loads, redemption fees, and other fund fees and expenses, e.g.), and such internal expenses subtract from its potential for market appreciation. Shares of mutual funds may only be traded at their stated net asset value ("NAV"), calculated at the end of each day upon the market's close.

Investing in exchange traded funds ("ETFs") bears similar risks and incurs similar costs to investing in mutual funds as described above. However, shares of an ETF may be traded like stocks on the open market and are not redeemable at an NAV. As such, the value of an ETF may fluctuate throughout the day and investors will be subject to the cost associated with the bid-ask spread (the difference between the price a buyer is willing to pay (bid) for an ETF and the seller's offering (asking) price).

Clients are encouraged to carefully read the prospectus of any mutual fund or ETF to be purchased for investment to obtain a full understanding of its respective risks and costs.

- iv. Investing in common stocks means that a client will be subject to the risks of the overall market as well as risks associated with the particular company or companies whose stock is owned. These risks can include, for example, changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. Common stocks tend to be more volatile and more risky than certain other forms of investments, especially as compared to fixed income products like bonds.
- v. Investing in bonds means that a client will be subject to the market prices of such debt securities, which typically fluctuate depending on interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and rise when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk. Bonds are also

subject to inflation risk, reinvestment risk, redemption risk, and valuation risk.

- vi. Investing in REITs means that clients will be subject to the risks associated with investments in mortgages and their related activities in addition to the general risk of equity and financial markets. Among the factors that the REIT industry is vulnerable to are: (1) change in government regulation, primarily the pass-through tax treatment of REIT income, (2) the market for residential mortgage assets, (3) the general level and term structure for interest rates. The common equity prices of REITs have historically been more closely correlated with changes in interest rates than other non-REIT equity securities. Additionally, REITs tend to be more illiquid in nature, may contain additional fees, and may experience disruptions in distributions in comparison to other types of securities.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Adviser's advisory business or the integrity of Adviser's management.

Item 10: Other Financial Industry Activities & Affiliations

- A. Neither Adviser nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Adviser nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C. Neither Adviser nor any of its management persons have any relationship or arrangement with any related person below:
 - i. broker-dealer, municipal securities dealer, or government securities dealer or broker
 - ii. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
 - iii. futures commission merchant, commodity pool operator, or commodity trading advisor
 - iv. banking or thrift institution
 - v. accountant or accounting firm
 - vi. lawyer or law firm
 - vii. insurance company or agency
 - viii. pension consultant
 - ix. real estate broker or dealer
 - x. sponsor or syndicator of limited partnerships
- D. Affiliation with other investment advisers:
 - i. Jeffrey Snodgrass, Director and Chief Compliance Officer of Adviser has a relationship with another investment adviser, Mindful Wealth, LLC ("Mindful Wealth"). Mr. Snodgrass is the Managing Member and Chief Compliance Officer of Mindful Wealth. He also owns 100% of Mindful Wealth.

- ii. Michael E. Kitces, indirect owner of Adviser, has relationships with other investment advisers. He is Head of Planning Strategy and IAR of Buckingham Strategic Wealth, LLC.
- iii. A conflict of interest exists to the extent that Adviser or its Supervised Persons recommends these other investment advisers to clients or where those other investment advisers recommend their clients use Adviser's services. In order to mitigate these conflicts, Adviser does not allow such cross referrals.

E. Adviser's Model Portfolio Program:

- i. As disclosed in Item 2, Adviser maintains a separate brochure that covers its Model Portfolio Program, in which Adviser constructs and manages investment models ("Model Portfolios") through a technology solution. The Model Portfolios can be used by independent registered investment advisers ("RIAs") that are not affiliated with Adviser. Prior to Adviser rendering investment advisory services, RIAs are required to enter into a written agreement with Adviser setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement"). The investing clients of RIAs are required to sign a new account opening form and/or limited power of attorney that authorizes Adviser to manage the Model Portfolios into which they are invested. RIAs are responsible for assigning Model Portfolios to their own clients.
- ii. Adviser manages its Model Portfolios on a discretionary basis primarily by allocating assets among various mutual funds and ETFs. While Adviser will select mutual funds and ETFs for the Model Portfolios, provide guidance and information about the Model Portfolios to RIAs, RIAs are responsible for choosing the specific model and allocation for each of their own clients.
- iii. Adviser may work with an RIA to create a custom model portfolio to fit a client's unique needs, however, the model will be monitored and managed by the RIA.

F. XY Planning Network, Inc. ("XYPN"):

- i. Adviser is a wholly-owned subsidiary of XYPN. XYPN is a community-driven advisor support network of more than one thousand five hundred financial

advisors that provides tools, resources, and services, to enable financial advisors to start, run, and grow their own fee-only financial planning practices serving Gen X and Gen Y clients for a monthly subscription fee. XYPN connects consumers with a diverse community of fee-only Certified Financial Planners dedicated to bringing real financial planning to the next generation without regard to investment account minimums.

- ii. To the extent a member of XYPN purchases a subscription to the Orion Advisor Tech (an RIA-centric software service provided by Orion Advisor Solutions, Inc. ("Orion")) directly through Orion instead of through Adviser, Orion may share a portion of the revenue it receives from such subscription with Adviser. This creates a financial incentive to recommend Orion to clients in its Model Portfolio Program, which presents a conflict of interest. Adviser addresses this conflict of interest by disclosing it in this brochure, by advising clients in its Model Portfolio Program that they are under no obligation to subscribe to the Orion, whether through Adviser or directly with Orion, and by only continuing to utilize Orion if believed to be in the best interests of clients.

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

- A. Adviser has adopted a code of ethics that will be provided to any client or prospective client upon request. Adviser's code of ethics describes the standards of business conduct that Adviser requires of its supervised persons, which is reflective of Adviser's fiduciary obligations to act in the best interests of its clients. The code of ethics also includes sections related to compliance with securities laws, reporting of personal securities transactions and holdings, reporting of violations of the code of ethics to Adviser's Chief Compliance Officer, pre-approval of certain investments by access persons, and the distribution of the code of ethics and any amendments to all supervised persons followed by a written acknowledgement of their receipt.
- B. Neither Adviser nor any of its related persons recommends to clients, or buys or sells for client accounts, securities in which Adviser or any of its related persons has a material financial interest.
- C. From time to time, Adviser or its related persons will invest in the same securities (or related securities such as warrants, options or futures) that Adviser or a related person recommends to clients. This has the potential to create a conflict of interest because it affords Adviser or its related persons the opportunity to profit from the investment recommendations made to clients. Adviser's policies and procedures and code of ethics address this potential conflict of interest by prohibiting such trading by Adviser or its related persons if it would be to the detriment of any client and by monitoring for compliance through the reporting and review of personal securities transactions. In all instances Adviser will act in the best interests of its clients.
- D. From time to time, Adviser or its related persons will buy or sell securities for client accounts at or about the same time that Adviser or a related person buys or sells the same securities for its own (or the related person's own) account. This has the potential to create a conflict of interest because it affords Adviser or its related persons the opportunity to trade either before or after the trade is made in client accounts, and profit as a result. Adviser's policies and procedures and code of ethics address this potential conflict of interest by prohibiting such trading by Adviser or its related persons if it would be to the detriment of any client and by monitoring for

compliance through the reporting and review of personal securities transactions. In all instances, Adviser will act in the best interests of its clients.

Item 12: Brokerage Practices

A. Adviser considers several factors when recommending a custodial broker-dealer for client transactions and determining the reasonableness of such custodial broker-dealer's compensation. Such factors include the custodial broker-dealer's industry reputation and financial stability, service quality and responsiveness, execution price, speed and accuracy, reporting abilities, and general expertise. Assessing these factors as a whole allows Adviser to fulfill its duty to seek best execution for its clients' securities transactions. However, Adviser does not guarantee that the custodial broker-dealer recommended for client transactions will necessarily provide the best possible price, as price is not the sole factor considered when seeking best execution. After considering the factors above, Adviser recommends Charles Schwab & Company, Inc. ("Schwab") as the custodial broker-dealer for client accounts.

- i. Adviser does not receive research and other soft dollar benefits in connection with client securities transactions, which are known as "soft dollar benefits". However, the custodial broker-dealer(s) recommended by Adviser do provide certain products and services that are intended to directly benefit Adviser, clients, or both. Such products and services include (a) an online platform through which Adviser can monitor and review client accounts, (b) access to proprietary technology that allows for order entry, (c) duplicate statements for client accounts and confirmations for client transactions, (d) invitations to the custodial broker-dealer(s)' educational conferences, (e) practice management consulting, (f) discounts on compliance, marketing, research, technology, and practice management products or services provided to Adviser by third party vendors, and (g) occasional business meals and entertainment.
- ii. Schwab has also historically sponsored the national conference hosted by XYPN, and has directly paid third-party technology, research, marketing, compliance, and consulting-related expenses that would otherwise be borne directly by XYPN. Schwab retains the authority to continue such conference sponsorship and third-party vendor expense reimbursement, and XYPN may therefore continue to receive such benefits from Schwab in the future.

- iii. Schwab also provides access to its investment adviser platform to XYPN member advisers regardless of the assets managed or placed on Adviser's platform. There is no direct link between Adviser's participation in Schwab's institutional customer program and the investment advice it gives to its clients, although Adviser Invest receives economic benefits through its participation in the program that are typically not available to Schwab retail investors.

- B. The receipt of these products and services creates a conflict of interest to the extent it causes Adviser to recommend Schwab as opposed to a comparable custodial broker-dealer. Adviser addresses this conflict of interest by fully disclosing it in this brochure, evaluating Schwab based on the value and quality of its services as realized by clients, and by periodically evaluating alternative broker-dealers to recommend.

- C. Adviser does not consider, in selecting or recommending custodial broker-dealers, whether Adviser or a related person receives client referrals from a custodial broker-dealer or third-party.

- D. Adviser does not routinely recommend, request, or require that a client direct Adviser to execute transactions through a specified custodial broker-dealer other than Schwab.

- E. Adviser retains the ability to aggregate the purchase and sale of securities for clients' accounts with the goal of seeking more efficient execution and more consistent results across accounts. Aggregated trading instructions will not be placed if it would result in increased administrative and other costs, custodial burdens, or other disadvantages. If client trades are aggregated by Adviser, such aggregation will be done so as not to disadvantage any client and to treat all clients as fairly and equally as possible.

Item 13: Review of Accounts

- A. The designated Investment Adviser Representative (“IAR”) of a client’s account is responsible for monitoring the client’s account(s) on an ongoing basis, and typically reviews client accounts on at least an annual basis. Such reviews are designed to ensure that the client is still on track to achieve his or her financial goals, and that the investments remain appropriate given the client’s risk tolerance, investment objectives, major life events, and other factors. Clients are encouraged to proactively reach out to their IAR to discuss any changes to their personal or financial situation.

- B. Other factors that may trigger a review include, but are not limited to, material developments in market conditions, material geopolitical events, and changes to a client’s personal or financial situation (the birth of a child, preparing for a home purchase, plans to attend higher education, a job transition, impending retirement, death or disability among family members, etc.).

- C. The custodial broker-dealer will send account statements and reports directly to clients no less frequently than quarterly. Such statements and reports will be mailed to clients at their address of record or delivered electronically, depending on the client’s election. If agreed to by Adviser and client, Adviser or a third-party report provider will also send clients reports to assist them in understanding their account positions and performance, as well as the progress toward achieving financial goals.

Item 14: Client Referrals and Other Compensation

- A. Nobody other than clients provides an economic benefit to Adviser for providing investment advice or other advisory services to clients. However, as described above in Item 12, the custodial broker-dealer(s) recommended for client accounts provides certain products and services that are intended to directly benefit Adviser, clients, or both.

- B. Neither Adviser nor a related person directly or indirectly compensates a person who is not Adviser's supervised person for client referrals.

- C. Dimensional Fund Advisors, LP ("DFA") has historically sponsored the national conference hosted by XYPN, and DFA retains the authority to continue such conference sponsorship in the future. Certain client investment portfolios include mutual funds and ETFs sponsored and managed by DFA. This creates a conflict of interest to the extent DFA's sponsorship of XYPN's national conference causes Adviser to include DFA mutual funds and ETFs in its investment portfolios, or to otherwise recommend DFA mutual funds or ETFs to its clients. Adviser addresses this conflict of interest by fully disclosing it in this brochure, and by only making investment portfolio allocation decisions and recommendations without regard for any benefits conferred by DFA.

Item 15: Custody

For clients that do not have their fees deducted directly from their account(s) and have not provided Adviser with any standing letters of authorization to distribute funds from their account(s), Adviser will not have any custody of client funds or securities.

For clients that have their fees deducted directly from their account(s) or that have provided Adviser with discretion as to amount and timing of disbursements pursuant to a standing letter of authorization to disburse funds from their account(s), Adviser will typically be deemed to have limited custody over such clients' funds or securities pursuant to the SEC's custody rule and subsequent guidance thereto. At no time will Adviser accept full custody of client funds or securities in the capacity of a custodial broker-dealer, and at all times client accounts will be held by a third-party qualified custodian as described in Item 12, above.

If a client receives account statements from both the custodial broker-dealer and Adviser or a third-party report provider, client is urged to compare such account statements and advise Adviser of any discrepancies between them.

Item 16: Investment Discretion

Adviser accepts discretionary authority to manage securities accounts on behalf of clients only pursuant to the mutual written agreement of Adviser and the client through a power-of-attorney, which is typically contained in the advisory agreement signed by Adviser and the client. This includes the authority to buy, sell, and otherwise transact in securities and other investment products in client's account(s) without necessarily consulting with clients in advance. Clients may place reasonable limitations on this discretionary authority so long as it is contained in a written agreement and/or power-of-attorney.

Item 17: Voting Client Securities

- A. Adviser does not have and will not accept authority to vote client securities.
- B. Clients will receive their proxies or other solicitations directly from their custodial broker-dealer or a transfer agent, as applicable, and should direct any inquiries regarding such proxies or other solicitations directly to the sender.

Item 18: Financial Information

- A. Adviser does not require or solicit prepayment of fees six months or more in advance.
- B. Adviser has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.
- C. Adviser has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 1: Cover Page

XY Investment Solutions, LLC
(Doing business as Momentous Wealth Advisors)

Form ADV Part 2B Brochure Supplement for Brian D. Muller

Address: 9010 Bur Oak Ct., Woodbury, MN 55129

Phone: (651) 335-4457

Website: <https://www.momentouswealthadvisors.com/>

This brochure supplement provides information about Brian D. Muller that supplements the XY Investment Solutions, LLC brochure. You should have received a copy of that brochure. Please contact XY Investment Solutions, LLC if you did not receive XY Investment Solutions, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian D. Muller is available on the SEC's website at www.adviserinfo.sec.gov and by searching for CRD# 2769605.

Item 2: Educational Background & Business Experience

Name:

Brian D. Muller

Year of Birth:

1973

Education:

- 1996 – Finance Degree, St. Cloud State University
- 1994 – Associate of Arts Degree, Lakewood Community College

Business Background:

- 02/2024 – Present, XY Investment Solutions, LLC, Financial Advisor
- 04/2021 – 02/2024, Total Wealth Advisors, LLC, Investment Adviser Representative
- 01/2007 – 04/2021, Edward Jones, Investment RepFinancial Advisor

Professional Designations:

- **AAMS (Accredited Asset Management Specialist)®:** Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. The program involves approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

The College for Financial Planning® awards the AAMS® designation to students who successfully complete the program, pass the final examination, and comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed. Continued use of the AAMS® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the AAMS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to a client's or prospective client's evaluation of Brian D. Muller.

Item 4: Other Business Activities

Brian D. Muller serves as the Executive Director of the Amie Muller Foundation, a 501(c)3 dedicated to support veterans. This activity requires approximately 1 hour per month outside of normal trading hours.

Item 5: Additional Compensation

Brian D. Muller does not receive any economic benefit from any third-party other than clients for providing advisory services. Such economic benefits for his clients at XY Investment Solutions, LLC are conveyed through XY Investment Solutions, LLC.

Item 6: Supervision

Brian D. Muller is supervised and monitored by Jeff Snodgrass, Chief Compliance Officer, pursuant to XY Investment Solutions, LLC's written policies and procedures and code of ethics. Jeff Snodgrass may be reached at (360) 301-7579.

FACTS	WHAT DOES XY INVESTMENT SOLUTIONS, LLC DO WITH YOUR FINANCIAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Financial account balances and assets ▪ Transaction history
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How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons XY Investment Solutions, LLC chooses to share; and whether you can limit this sharing.
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Reasons we can share your personal information	Does XY Investment Solutions, LLC share?	Can you limit this sharing?
For our everyday business purposes: such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes: to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our affiliates' everyday business purposes: information about your engagement, experiences, and assets	Yes	No
For our affiliates' everyday business purposes: information about your creditworthiness	No	Not Applicable
For our non-affiliated persons who are contracted with us, for everyday business purposes: <i>Arrangements with companies or independent contractors not affiliated with XY Investment Solutions, LLC</i>	Yes	No
For our affiliates to market to you	Yes	[-]
For non-affiliates to market to you	No	Not Applicable

To limit our sharing	<p>Call (360) 301-7579 or go to xyplanningnetwork.com/invest</p> <p>Please note: If you are a <i>new</i> client, we can begin sharing your information 10 days from the date we sent this notice. When you are <i>no longer our client</i>, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call (360) 301-7579 or go to xyplanningnetwork.com/invest
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Privacy Policy Notice

Who we are	
Who is providing this notice?	XY Investment Solutions, LLC
What we do	
How does XY Investment Solutions, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building, as well as other physical, electronic, and procedural safeguards.
How does XY Investment Solutions, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Sign an investment advisory agreement ▪ Seek advice about your investments ▪ Tell us about your investment or retirement portfolio or earnings <p>We also collect your personal information from our affiliates.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes - information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ XY Planning Network, Inc. ▪ AdvicePay ▪ Kitces.com ▪ fpPathfinder ▪ New Planner Recruiting
Non-Affiliates	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ We do not share with non-affiliates so they can market to you
Joint marketing	We do not jointly market to you.
Other Important Information	
<p>XY Investment Solutions, LLC may also share your personal information with a successor advisor if necessary in connection with the unexpected death or incapacity of its principal owner(s), as well as in connection with the eventual retirement or other change in control of the firm.</p>	