COUNTERBALANCE
DIVORCE SOLUTIONS

DISCLOSURE PACKET

Counterbalance Divorce Solutions, LLC

Delivered with and incorporated into the Divorce Planning Retainer Agreement

This Disclosure Packet contains four sections: (A) Conflict of Interest Disclosure, (B) Privacy Policy and Information Security, (C) Insurance Coverage Disclosure, and (D) IDFA Standards and Complaint Process. You will receive an updated copy annually and at any time upon request.

A. CONFLICT OF INTEREST DISCLOSURE

This disclosure explains potential conflicts of interest within and between our business practices, consistent with IDFA Ethics Rule 5 (Objectivity).

Counterbalance Divorce Solutions, LLC

Through Counterbalance Divorce Solutions, LLC, Kyle Eaton provides fee-for-service divorce financial analysis and planning. Kyle Eaton is the primary owner of this company.

Hedgefield Wealth Management, LLC

Through Hedgefield Wealth Management, LLC, Kyle Eaton offers financial planning and asset management on a fee-only basis to separate clients. Kyle Eaton has a vested financial interest in directing business to this firm.

Independence of Services

When you work with Counterbalance Divorce Solutions, fees are charged separately and independently from any Hedgefield Wealth Management engagement. You are not obligated in any way to retain Kyle Eaton or Hedgefield Wealth Management as your financial planner or asset manager after your divorce. You are free to select any financial planning firm, Registered Investment Adviser, or other professional to implement any recommendations.

Consistent with IDFA Ethics Rule 5, any divorce financial analysis recommendations made through Counterbalance are made independently of any potential financial planning or investment management relationship, to avoid conflicts of interest.

Scope Limitations

Kyle Eaton is not authorized to render legal advice or prepare legal documentation. You will need a licensed attorney for those services. Kyle Eaton is not authorized to prepare or amend personal income, gift, or estate tax returns. You will need a CPA or accountant for those services. Kyle Eaton is not authorized to serve as a trustee. Select appropriate individuals or trust companies, with guidance from your attorney, for that role.

Acknowledgment

This disclosure explains our business practices and any potential conflicts of interest. You will receive an updated copy of this disclosure annually and at any time upon request.

B. PRIVACY POLICY AND INFORMATION SECURITY

This Privacy Policy is provided at initial signing and annually thereafter. It governs how Counterbalance Divorce Solutions, LLC collects, uses, protects, and retains your nonpublic personal information.

Information We Collect

We collect nonpublic personal information from the following sources:

- Information you provide on applications, forms, or directly during our engagement
- Information about your financial transactions with us or others
- Information received from consumer reporting agencies

How We Use and Share Your Information

We do not disclose your nonpublic personal information to anyone except as previously agreed with you or as permitted by law. If you become an inactive client, we will continue to adhere to the policies described in this notice.

Access to Your Information

Access to your personal and account information is restricted to employees and personnel who need it to provide services to you:

- Primary: Kyle Eaton

Technology Platforms

The following systems are used in our practice and may have access to your nonpublic information: Salesforce, Dropbox, Microsoft, Family Law Software, Asset-Map, Zoom, Tiller, and RingCentral. All third-party service providers have been advised of our commitment to client information security.

Security Measures

We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information, including encryption, password protection, data backups, and annual security review and testing. Employees are trained on confidentiality obligations and proper file handling.

Data Breach Notification

In the event of a breach affecting your nonpublic personal information, we will notify you as required by the Texas Identity Theft Enforcement and Protection Act (Tex. Bus. & Com. Code Ch. 521) and any other applicable law.

Record Retention and Disposal

We retain client records for a minimum of 7 years following the conclusion of your engagement, or longer as required by applicable law. Records are disposed of using methods that protect against unauthorized access or use.

C. INSURANCE COVERAGE DISCLOSURE

Counterbalance Divorce Solutions, LLC maintains professional liability (errors and omissions) insurance through Evanston Insurance Company, a Markel company, under a group master policy issued to the XY Planning Network.

Insurer	Evanston Insurance Company (Markel)
Policy Number	FP83311I
Coverage Type	Investment Adviser, Professional Services & D&O Liability
Per Entity Limit — Divorce Financial Consultant	$500,000
D&O Liability Limit	$1,000,000
Retention (per claim)	$5,000
New Claim Reporting	newclaims@markel.com | 800-362-7535
General Claims Inquiries	markelclaims@markel.com | 800-362-7535
Mailing Address	Markel Claims, P.O. Box 2009, Glen Allen, VA 23058-2009

Important: Entity Coverage Note

The policy is issued in the name of Hedgefield Wealth Management, LLC as the Named Insured under the XY Planning Network master policy. Counterbalance Divorce Solutions, LLC is covered as an affiliated entity under common ownership, as confirmed by our insurance broker. You may request a certificate of insurance at any time by contacting us.

Claims-Made Policy

This is a claims-made policy, meaning coverage applies to claims first reported to Markel during the active policy period — not merely when a service was rendered. If you need to file a claim, do so as early as possible. Do not wait until the policy period ends.

Extended Reporting Period

If the policy is cancelled or not renewed, a 60-day Basic Extended Reporting Period is automatically available at no additional cost. A Supplemental Extended Reporting Period may be purchased within 30 days of cancellation or non-renewal. We will notify active clients of any material change in coverage status.

How to Report a Claim

To report a new claim: email newclaims@markel.com or call 800-362-7535. Have the following available: policy number (FP83311I), your name and contact information, date of loss, and details of the claim. For general inquiries after a claim is filed, contact markelclaims@markel.com.

D. IDFA STANDARDS AND COMPLAINT PROCESS

Kyle Eaton holds the Certified Divorce Financial Analyst (CDFA®) designation issued by the Institute for Divorce Financial Analysts (IDFA). The IDFA has adopted a Code of Ethics and Professional Responsibility and Divorce Financial Analyst Practice Standards that are binding on all CDFA® designees.

IDFA Code of Ethics — Seven Rules

- Rule 1 — Integrity: Maintain the highest standard of honesty in all dealings with clients, colleagues, and the IDFA
- Rule 2 — Confidentiality: Maintain strict confidentiality of all client information; take reasonable measures to ensure data security; confidentiality obligations continue after the engagement ends
- Rule 3 — Avoidance of Legal Advice: Never provide legal advice; direct clients to qualified attorneys; avoid any actions that could constitute the unauthorized practice of law
- Rule 4 — Competence: Maintain high competency through continuing education; provide services only within the scope of CDFA® expertise; refer clients to specialists when needed
- Rule 5 — Objectivity: Remain neutral and unbiased when hired as a neutral; disclose conflicts of interest immediately; do not accept gifts when serving as neutral; make recommendations independent of any investment management relationship
- Rule 6 — Professionalism: Conduct all interactions with honesty, integrity, and professionalism; make no false or misleading claims about services or qualifications
- Rule 7 — Compliance: Comply with all applicable laws, regulations, and professional standards; engage in ethical marketing practices; comply with IDFA disciplinary actions

IDFA Practice Standards — Five-Step Process

- Step 1: Establish and define the relationship — scope of services, fees, responsibilities, and conflicts of interest
- Step 2: Gather client data — obtain sufficient quantitative and qualitative financial information; notify client in writing if insufficient information prevents completing the assignment
- Step 3: Complete the analysis — using reasonable, unbiased judgment and sound economic and financial principles
- Step 4: Deliver work product — in a professional and competent manner reflecting the standards of the divorce financial analyst profession
- Step 5: Confirm engagement completion — send written confirmation summarizing services rendered and any open referrals

IDFA Disciplinary Process

The IDFA investigates complaints against CDFA® designees through its Ethics Committee. Possible disciplinary outcomes include dismissal (confidential), private censure letter (confidential), suspension, or permanent revocation of the CDFA® designation. Suspensions and revocations may be made public at the IDFA's discretion.

How to File a Complaint

Complaints against a CDFA® designee must be submitted in writing to:

Institute for Divorce Financial Analysts
3622 Lyckan Parkway, Suite 3003 · Durham, NC 27707
Toll-Free: 800-875-1760 · support@institutedfa.com · institutedfa.com

The Ethics Committee chairman will request information from the CDFA® designee within 30 days, evaluate the complaint, and make a disciplinary recommendation. The designee may appeal within 20 days. The Steering Committee's final decision is binding.

CDFA® Recertification Requirements

To maintain the CDFA® designation, Kyle Eaton completes 24 hours of continuing education plus 2 hours of ethics CE every two years (26 IDFA-approved CE credits total), pays an annual recertification fee, and voluntarily discloses any public, civil, criminal, or disciplinary actions as part of the renewal process.

Kyle Eaton, CDFA®, CFP®
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