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March 31, 2023

Re: Update to Form ADV Part 2A

Dear Investor:

Pursuant to Rule 204-3 of the Investment Advisers Act of 1940, the U.S. Securities and Exchange Commission requires us to deliver to each client, on an annual basis, a current copy of our disclosure brochure (Form ADV Part 2A), or a summary of material changes to the disclosure brochure with an offer to provide a current copy upon request. While we have made certain revisions to our Form ADV Part 2A to account for the passage of time, we do not believe the changes would be deemed material.

Should you have questions regarding the Form ADV Part 2A amendment, please do not hesitate to contact us. Additionally, we are pleased to provide our current disclosure brochure documents upon request, which include information about our investment advisory services, investment professionals and other information.

Sincerely,

Mrs. Raye G. White Executive Vice-President