

## Item 1 - Cover Page

Mill Creek Capital Advisors, LLC (MCCA)

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Suite 1500

Conshohocken, Pennsylvania 19428

610-941-7700

<https://www.millcreekcap.com>

April 2022

This Brochure provides information about the qualifications and business practices of MCCA. If you have any questions about the contents of this Brochure, please contact us at 610-941-7700. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

MCCA is an SEC Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

MCCA does require that any person responsible for determining or giving advice to you have a minimum of two years' experience in the financial services industry and a bachelor's degree or higher.

Additional information about MCCA is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

The only material changes since the date of our last annual update of our brochure, which in this instance was March 2022 was the appointment of John Canning as Chief Compliance Officer.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting John Canning, Chief Compliance Officer, at 610-941-7700 or [jcanning@millcreekcap.com](mailto:jcanning@millcreekcap.com). Our Brochure is also available on our web site free of charge at <https://www.millcreekcap.com>. Additional information about MCCA is also available via the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 4 – Advisory Business

Mill Creek Capital Advisors, LLC (“MCCA”) provides investment supervisory services to high net-worth individuals, pension plans, endowments, 401(k), 403b and similar institutions, among other types of clients. MCCA has been registered as an investment adviser with the SEC since September 2006. As of December 31, 2021, we have approximately \$9.5 billion in assets under management. We manage approximately \$8.7 billion on a discretionary basis and approximately \$700 million on a non-discretionary basis. SG Management, an employee owned holding company, owns greater than 25% of MCCA. The principal owners of MCCA are Joshua Gross, Chief Executive Officer, Richard Lunsford, President, Michael Jordan, Investment Officer, Dave Logan, Investment Officer, Kevin Keating, Investment Officer, Katie Thomas, Investment Officer and Brian Maxwell, Investment Officer.

Acting as your investment adviser, we build custom investment programs. We collaborate with you to develop objectives within suitable risk/reward parameters relative to your financial circumstances, and then develop an appropriate asset allocation strategy. We begin with a model portfolio constructed for each specific investment strategy MCCA offers, and then tailor the model for each client taking into account its individual needs, including client requested restrictions, cash needs, tax considerations, and other items, while generally remaining consistent with the MCCA model for that strategy. There may be an opportunity to employ client requested restrictions on a case by case basis; any proposed client requested restrictions should be provided to MCCA in writing in advance for its consideration. MCCA will also consider allowing clients to impose restrictions on investing in certain securities or types of securities.

MCCA offers a number of investment strategies that include equity and fixed income allocations in varying percentages; some of these strategies include hedging and/or private equity components. MCCA selects third party investment advisory organizations (“Specialist Managers”) to handle the selection of specific investments consistent with the overall asset allocation strategy developed. Specialist Managers are selected based on our overall evaluation of the investment advisory organization involved, including that organization’s performance against selected benchmarks, investment style within a particular asset class and related factors.

MCCA receives a fee for providing the overall asset allocation strategy in addition to other services. We will also negotiate the fees payable to the Specialist Managers on your behalf and communicate client restrictions, if any, applicable to portfolio investments and/or expense management to Specialist Managers. Access to Specialist Managers will be provided by establishing a separate account with a Specialist Manager or through the use of pooled vehicles, including mutual funds and exchange traded funds. Our ability to negotiate fees with Specialist Managers and communicate client restrictions is limited with respect to mutual funds and exchange traded funds.

MCCA monitors the performance of Specialist Managers, including their adherence to investment style and continuing suitability with respect to your overall asset allocation strategy, as well as overall expense levels. As part of this monitoring process, we employ the services of various outside consulting and research providers to obtain performance measurement, including index and peer group comparisons, and/or other services. We continuously monitor the capital markets and various asset classes. Periodically, we may recommend that you make tactical changes to your strategic asset allocation in seeking to avoid risk or attract returns associated with investment opportunities.

MCCA utilizes various custodians and back office service providers to obtain detailed transaction statements on a monthly basis, as well as quarterly and annual performance reports. These custodians and back office service providers also provide access to your account information through secure, access-controlled websites. MCCA will also work with custodians and service providers that you select.

## Item 5 – Fees and Compensation

MCCA's fee for its services is generally based on a percentage of assets under management, in accordance with the fee schedule below. Fees may be negotiated based on factors deemed relevant by us, including the value of assets placed with us) and/or special factors that in our view may either increase or reduce expenses associated with the administration of an account or multi-account relationship.

Depending on the size of your accounts and other circumstances, fee increases or reductions in accordance with the following schedule and other fee reductions may be appropriate:

Account Value	Applicable Fee Rate (\$30,000 minimum)
\$5mm - \$10mm	0.65%
\$10mm - \$20mm	0.60%
\$20mm - \$50mm	0.55%
\$50mm - \$100mm	0.50%
\$100mm +	0.40% (negotiable)

Under special circumstances, we will accept and maintain accounts valued at less than \$5 million. In these cases, we typically charge a minimum fixed fee of \$30,000. Additionally, under limited circumstances clients may be charged a flat fee.

MCCA attempts to avoid all conflicts of interest. We receive no remuneration outside of the asset-based fees directly paid to us. We do not charge fees based on the advice given or decisions made. All program costs, direct and indirect, are fully detailed to you.

MCCA's fee is generally payable, in advance, on the first business day of each calendar quarter. The fee is based on the market value of the account as of the last business day of the previous quarter. There is no adjustment made to MCCA's fee as a result of increases or decreases in account asset values during a quarter. Fees payable upon establishment or termination of the account will be prorated for the portion of the calendar quarter during which the account is managed. A prorated refund will be given if you terminate our services after a quarterly fee payment. The fees for the Specialist Managers are paid separately and are charged to your account. Investments in commingled funds made on your behalf, whether in mutual funds, exchange traded funds, limited partnerships or other structures, will include their own fees and expenses, including management and fund administration fees, among others. A complete explanation of all fees and expenses charged by commingled funds is contained in each funds' offering documents, which should be read carefully.

All fees, including those payable to MCCA, Specialist Managers, custodian banks and back office service providers appear on your monthly MCCA statement. In all instances the client will have an opportunity to review all fees and expenses charged to its account. In certain instances, MCCA's fee for discretionary accounts is deducted from the client's assets by the platform provider while in other instances MCCA directly invoices the client for its fees.

Our services, with the exception of investments made in hedge funds and private equity, may be terminated by you or by MCCA upon thirty (30) calendar days prior written notice, without penalty. Longer notice is typically required for withdrawals from hedge funds and/or private equity investments.

In special circumstances, MCCA enters into consulting or similar engagements with clients on a non-discretionary basis. These clients pay a negotiated fee for a specified period of time. Fees are billed in equal installments on a quarterly basis immediately following quarter end. The consulting services may be terminated at any time by the client upon thirty (30) calendar day's written notice. In the event of termination, fees will be prorated to the termination date.

MCCA currently also serves as the investment advisor to certain partnerships created for investments in private equity or other “alternative” investments and may form additional partnerships in the future. A related person of MCCA, MCSR GP LLC, serves as general partner to these partnerships. MCSR GP LLC is wholly owned by MCSR GP LLC. Interests in the partnerships are made available exclusively to our clients, without sales charges. You must satisfy the suitability requirements specified in the offering circular related to each partnership.

As general partner, MCSR GP LLC does not receive a fee for the investment advisory services provided to the partnerships nor any special allocation or carried interest out of partnership profits, and neither it nor MCCA are not otherwise compensated for its or their services as general partner of these partnerships. Day-to-day investment decisions for the partnerships are generally provided by Specialist Managers selected by, and under the supervision of, us as general partner. Specialist Managers are paid directly by the partnership by which each is retained. All the terms of the partnership are fully set forth in their offering document.

Sales and client service personnel of MCCA are not compensated for referring client accounts to MCCA, for sales of the commingled funds offered to clients, or for client account portfolio transactions. Sales and client service personnel of MCCA do not receive asset-based sales charges or service fees from the mutual funds and exchange traded funds that clients invest in.

MCCA may from time to time compensate individuals or firms for soliciting clients on its behalf in accordance with the solicitation rules of the Investment Advisers Act of 1940, as amended (the “Advisers Act”) and/or other applicable law. Solicitation activity is accompanied by written notice where required that the solicitor is paid for its activity and the investor may obtain the product or service directly from MCCA rather than through the solicitor and further that payment of a solicitation fee may adversely impact the investor’s ability to negotiate fees with MCCA.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

MCCA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

MCCA provides investment advice to a variety of different types of clients, including individuals, high net -worth individuals, pooled investment vehicles, pension and profit-sharing plans, 401(k), 403b, trusts, estates, charitable organizations, corporations and endowments, among others. Absent special circumstances, we accept and maintain only those accounts valued at \$5 million or more. The majority of these relationships are discretionary. MCCA has a limited number of non-discretionary investment consultant relationships.

MCSR GP LLC , a related person of MCCA ,also serves as the general partner for certain investment limited partnerships.

Although MCCA uses its best efforts to avoid any actual or potential conflicts of interest, such conflicts may arise from its management of multiple client accounts at the same time. MCCA has policies and procedures in place that are intended to eliminate and/or mitigate these actual or potential conflicts and that are described in this Brochure, including in the Code of Ethic and Brokerage Practices sections. One potential conflict of interest that may arise is based on the different investment objectives and strategies employed by MCCA clients. Depending on each client account’s investment objectives and investment strategies, MCCA may give investment advice and/or execute portfolio transactions for one client account that may differ from the investment advice given and/or portfolio transactions executed for another client account. MCCA’s investment decisions are the product of many factors, including client specific investment guidelines as well as suitability considerations for a particular client account. Thus, it is possible that MCCA may buy a particular security for one or more client accounts when one or more other client accounts are selling that security, and vice versa.

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

MCCA's services involve the development of asset allocation strategies for you and the selection of Specialist Managers to implement such strategies, rather than the selection of individual securities within a specific client account. Our asset allocation process involves the development of model portfolios, determining client specific asset class weightings based on sought-after returns and specific risk tolerance levels and determining the optimal mix of alternative investment strategies, if any, for each client.

MCCA's asset allocation strategies have not to date and probably will not involve investments in futures contracts, options or options on futures contracts. However, Specialist Managers may, with respect, to separate client accounts and/or in the context of a particular partnership for which we serve as general partner, employ hedging funds in which clients are invested, involving options and financial futures contracts, including options on such contracts.

For certain clients, our asset allocation strategies may also include investments in gold and other precious metals, direct investments in real estate and in private partnerships (including those for which we serve as general partner or special limited partner). The investment portfolios of such private partnerships may hold investments of any kind, including venture capital and leveraged investments.

MCCA formulates investment advice on the basis of its understanding of your unique financial circumstances, your investment return objectives, and your behavioral and economic tolerance for sustaining losses in portfolio value. Periodic face-to-face meetings and analyses of your financial assets and liabilities form the basis of our recommendations concerning how to structure an investment portfolio best suited to your circumstances.

Assets placed with us, but not yet invested in accordance with an investment plan developed by us for you, may be invested by us in a manner that, in our judgment, will afford you exposure to appropriate asset classes pending investment pursuant to such investment plan. These transitional investments may include fixed income and/or equity vehicles or cash management vehicles available through the custodian chosen for your accounts.

MCCA typically invests your assets across a wide variety of asset classes and investment strategies, each of which offers the potential for an increase or loss in principal value. Losses of value may be the result of declines in securities prices resulting from broadly-based declines in securities markets and/or declines in value due to circumstances unique to a particular security or investment strategy.

**Investments in securities involve risk of loss that clients should be prepared to bear. Additional and important information relating to risk is set forth below.**

MCCA seeks to minimize the risk of principal losses by diversifying your investment portfolios both across and within different asset classes and Specialist Managers. Although this strategy may help to minimize the possibility of widespread losses across your total investment portfolio, there is no guarantee that it will succeed in doing so. Some investment strategies, including but not limited to, investments in private equity and hedge fund strategies, have constraints on liquidity that may limit your ability to access money invested in these assets on short notice. We seek to minimize this risk by limiting overall portfolio investments in such illiquid investments and strategies, consistent with our understanding of your particular circumstances.

Because MCAA allocates client assets into equity securities in many of its investment strategies, including exchange traded and mutual funds that invest in equities, clients are subject to the risk that stock prices will fall over short or extended periods of time, and clients could lose all, or a substantial portion, of the value of their investments. Historically, the equity markets have moved in cycles, and the value of equity securities may fluctuate significantly from day to day. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of these companies' securities may decline in response. These factors contribute to price volatility, which is a principal risk of equity investing. In addition, many of the equity funds into which client assets are allocated invest in common stocks. Common stocks represent a share of ownership in a company, and rank after bonds and preferred stock in their claim on the company's assets in the event of a liquidation.

MCAA's investment approach may be out of favor at times, causing an investment strategy to underperform other strategies or funds that also seek capital appreciation but use different approaches to the stock selection and portfolio construction process.

Equity funds may participate in initial public offerings ("IPOs"). Some successful IPOs may have a significant impact on investment performance, especially if the account has lower asset levels. However, as account assets grow, the positive impact of successful IPOs on performance tends to decrease.

Investment strategies that make foreign investments are subject to special risks not typically associated with U.S. stocks. These stocks may underperform other types of stocks, and they may not increase or may decline in value. Investing in issuers headquartered or otherwise located in foreign countries poses additional risks since political and economic events unique to a country or region will affect those markets and their issuers. These events will not necessarily affect the U.S. economy or similar issuers located in the United States. The risks associated with foreign investments are heightened when investing in emerging markets. The government and economies of emerging market countries feature greater instability than those of more developed countries. Such investments tend to fluctuate in price more widely and to be less liquid than other foreign investments. In addition, investments in foreign countries are generally denominated in a foreign currency. As a result, changes in the value of those currencies compared to the U.S. dollar may affect (positively or negatively) the value of the investment.

Investment strategies are subject to the risk that small, medium and large capitalization stocks may underperform other segments of the equity market or the equity markets as a whole. The smaller and medium capitalization companies in which funds may invest may be more vulnerable to adverse business or economic events than larger, more established companies. In particular, these small and medium capitalization companies may have limited product lines, markets and financial resources, and may depend upon a relatively small management group. Therefore, smaller and medium capitalization stocks may be more volatile than those of larger companies.

MCAA investment strategies have the ability to buy and sell securities frequently which may result in higher transaction costs and additional tax liabilities.

Investment strategies permitting the use of options are subject to special risks associated with the use of options, including: (1) the success of a hedging strategy may depend on an ability to predict movements in the prices of individual securities, fluctuations in markets and movements in interest rates; (2) there may be an imperfect correlation between the movement in prices of options and the securities underlying them; (3) there may not be a liquid secondary market for options; and (4) while an account will receive a premium when its manager writes call options, it may not participate fully in a rise in the market value of the underlying security.

MCAA investment strategies are subject to risks associated with investments in exchange traded funds ("ETFs"). An investment in an ETF generally presents the same primary risks as an investment in a conventional mutual fund that has the same investment objectives, strategies, and policies. Additionally, the risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although the lack of liquidity of an ETF could result in it being more volatile.

Private equity vehicles will include holdings consisting of the equity securities of privately held companies. The securities of privately held companies are generally less liquid and more difficult to value than securities traded publicly on an exchange. A fund may not be able to sell the securities of privately held companies at the times or sale prices anticipated by its manager. Additionally, privately held companies are generally subject to fewer regulatory and reporting obligations than companies whose securities are publicly traded.

Certain of the investment strategies recommended by MCCA seek to "hedge" the account's positions as a way to obtain protection against adverse price movements. However, hedging is not without its costs and limitations. For example, hedging lowers the profit potential of the investment just as it lowers the loss potential. For this reason, MCCA may choose to hedge only part of a client's portfolio and only for a limited period of time, or a choice may be made not to hedge at all. Also, hedging involves expense, and a client will have to absorb the cost of purchasing the hedge instrument as well as the brokerage and related transaction charges. At times, such costs may outweigh the benefits of obtaining the hedge. Hedges are most effective when the hedge instrument is similar or identical to the position being hedged. A number of factors may cause the correlation

between the hedging instrument and primary position to decline. These include the differential effects of volatility between various instruments and uncorrelated changes in spreads between instruments.

In the futures markets, margin deposits typically range between 2% and 15% of the value of the futures contract purchased or sold. Because of these low margin deposits, futures trading is inherently leveraged. As a result, a relatively small price movement in a futures contract may result in substantial losses. Futures positions may be illiquid because certain commodity exchanges limit fluctuations in certain futures contract prices during a single day by regulations referred to as “daily price fluctuation limits” or “daily limits.” Under such limits, during a single trading day no trades may be executed at prices beyond the daily limits. Once the price of a particular futures contract has increased or decreased by an amount equal to the daily limit, positions in that contract can neither be taken nor liquidated unless traders are willing to effect trades at or within the limit. This could prevent a manager from promptly liquidating unfavorable positions and thus subject a fund to losses.

The market value of fixed income investments will change in response to interest rate changes and other factors. During periods of falling interest rates, the values of outstanding fixed income securities generally rise. Conversely, during periods of rising interest rates, the values of such securities generally decline. Moreover, while securities with longer maturities tend to produce higher yields, the prices of longer maturity securities are also subject to greater market fluctuations as a result of changes in interest rates. Changes in the rating of any fixed income security and in the ability of an issuer to make payments of interest and principal also affect the value of these investments. Changes in the value of these securities will not necessarily affect cash income derived from these securities, but will affect the investing fund’s net asset value. Investment grade bonds include securities rated BBB by S&P or Baa by Moody’s, which may be regarded as having speculative characteristics as to repayment of principal. Lower rated securities are also regarded as having speculative characteristics as to repayment of principal.

Mortgage-backed securities are instruments that entitle the holder to a share of all interest and principal payments from mortgages underlying the security. The mortgages backing these securities include conventional fifteen- and thirty-year fixed rate mortgages, graduated payment mortgages, adjustable rate mortgages, and balloon mortgages. During periods of declining interest rates, prepayment of mortgages underlying mortgage-backed securities can be expected to accelerate. Prepayment of mortgages that underlie securities purchased at a premium often results in capital losses, while prepayment of mortgages purchased at a discount often results in capital gains. Because of these unpredictable prepayment characteristics, it is often not possible to predict accurately the average life or realized yield of a particular issue.

In addition to the risks mentioned above, clients should be aware of other risk factors including but not limited to the following:

- Institutional Risk, i.e., the risk that a fund could incur losses due to: (i) the failure of counterparties to perform their contractual commitments to the fund or (ii) the financial difficulty of brokerage firms, banks or other financial institutions that hold the assets of the fund;
- Operational Risk, i.e., the special considerations and risks arising from the day-to-day management of a pooled investment vehicles like a fund; and
- Tax risk, i.e., the special considerations and risks arising from the operation of an investment vehicle under federal and state tax laws and whether those tax results are fully compatible with client expectations and tax needs.

As the use of technology has become more prevalent in the course of its business, MCAA has become potentially more susceptible to operational and information security risks resulting from breaches in cyber security. A breach in cyber security refers to both intentional and unintentional cyber events that may, among other things, cause MCCA and/or a client account to lose proprietary information, suffer data corruption and/or destruction or lose operational capacity, result in the unauthorized release or other misuse of confidential information, or otherwise disrupt normal business operations. Cyber security breaches may involve unauthorized access to MCCA’s digital information systems (e.g., through “hacking “or malicious software coding), but may also result from outside attacks such as denial-of-service attacks (i.e., efforts to make network services unavailable to intended users). In addition, cyber security breaches involving MCCA’s third party service providers and underlying funds (including but not limited to sub-managers, administrators, custodians, and other third parties), can also

subject MCCA to many of the same risks. Cyber security failures or breaches may result in financial losses, disruptions to business operations, and other adverse consequences.

## **Item 9 – Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. MCCA has had no legal or disciplinary events that would be material to such an evaluation.

## **Item 10 – Other Financial Industry Activities and Affiliations**

A related person of MCCA, MCSR GP LLC, serves as the general partner for certain investment limited partnerships we offer. MCSR GP LLC is not entitled to receive a fee, special allocation or carried interest for the investment advisory services MCCA provides to the partnerships, and we are not otherwise compensated for our services as general partner of these partnerships. Interests in the partnerships are made available exclusively to our clients who, in the judgment of the general partner, satisfy the suitability requirements specified in the offering circular relating to each partnership.

Chief Compliance Officer. John Canning is MCCA’s Chief Compliance Officer. Mr. Canning is a compliance consultant who has been engaged by Chenery Compliance Group, LLC (“Chenery”) to provide investment management compliance consulting services to investment advisers and other SEC/state registered clients of Chenery. MCCA has entered into a compliance services agreement with Chenery pursuant to which Mr. Canning provides compliance services to MCCA, including his appointment as MCCA’s Chief Compliance Officer.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

MCCA has adopted a Code of Ethics (the “Code”) that applies to all its supervised persons. MCCA’s Code is based on the principle that employees owe a fiduciary duty to MCCA’s clients. The Code includes provisions relating to the confidentiality of your information, a prohibition on insider trading, , restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All of our supervised persons must acknowledge the terms of the Code annually, or as amended.

MCCA will provide a copy of the Code to any client or prospective client upon written request to the Firm:

Mill Creek Capital Advisors, LLC

Attention: Compliance

161 Washington Street, Suite 1500

Conshohocken, PA 19428

MCCA anticipates that, in appropriate circumstances and consistent with your investment objectives, it will cause accounts over which we have management authority to effect the purchase or sale of securities in which we, and/or clients, directly or indirectly, have a position of interest. . Subject to satisfying the requirements of the Code, other policies, and applicable laws, officers, directors and our employees may trade for their own accounts in securities which are recommended to and/or

purchased for you. The Code is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, including investments in mutual funds and ETFs, based upon a determination that these would not materially interfere with the best interests of our clients. In addition, the Code requires pre-clearance of certain transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

Employee trading is monitored under the Code to reasonably prevent conflicts of interest between us and you.

MCCA does not sell financial products, collects no commissions, and receives no other hidden/soft forms of compensation. We have no affiliation to banks, investment managers, consultants, brokers or other third parties.

From time to time employees of MCCA may have personal contractual relationships with asset managers that are Specialist Managers, managers of funds into which MCCA clients invest, and/or are brokers used by MCCA in client transactions. These personal contacts do not serve as a basis for the selection of Specialist Managers, managers or brokers by MCCA or of the amount of any commissions paid to the broker. The MCCA employee's contract with the respective asset manager is on an arm's length basis under terms generally available to other comparable clients of the asset manager.

As noted in Item 10 "Other Financial Industry Activities and Associations" discussion above, MCCA may recommend that clients invest in MCCA funds and limited partnerships for which it serves as investment manager and its related person MCSR GP LLC serves as general partner. Its policies addressing the conflicts of interest that these circumstances present are described above.

From time to time, certain employees of MCCA may serve on the board of directors/trustees of a private company. MCCA has adopted policies and procedures as part of its compliance program that requires employees to obtain pre-approval of any such board service. In addition, MCCA's compliance policies and procedures impose limitations on personal and client account trading in connection with the securities of such private company and restrict the dissemination of any material nonpublic information about the private company or any public company obtained by the employee in his or her capacity as a director/trustee of the private company.

MCAA recognizes the importance of protecting the non-public personal information of its clients when providing advisory and other services. Please contact MCAA or visit its website at [www.millcreekcapcom](http://www.millcreekcapcom) for more information on, or for a copy of, its privacy policies. MCAA does not sell or provide non-public personal information of its clients for marketing purposes to others.

## **Item 12 – Brokerage Practices**

MCCA does not maintain custody of your assets although we may be deemed to have custody of your assets based on certain circumstances (See Item 15 "Custody"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. MCCA recommends that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, as the qualified custodian. MCCA is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when instructed to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 "Client referrals and other Compensation." You should consider these conflicts of interest when selecting your custodian.

MCCA does not have a trading desk. Generally, the selection of specific securities within designated asset categories, as well as the selection of brokers and dealers, is the responsibility of the individual Specialist Managers with whom we place your

assets. However, in those more limited instances where MCCA directly selects specific securities to be bought or sold – typically exchange traded funds and mutual funds - execution of client account transactions is primarily through Schwab, platform provider Brinker Capital, or through other trading and investment platforms selected by its clients and not by MCCA. MCCA's evaluation of best execution necessarily focuses on its best execution practices and policies of Schwab, the Specialist Managers and the platform providers which execute its client account trades.

Schwab, Specialist Managers and platform providers must by law execute securities transactions for MCCA clients in such a manner that the clients' total cost or proceeds in a transaction is the most favorable under the circumstances. In making this determination, the trader considers the full range and quality of a broker's services in placing brokerage including, among other things, the value of research provided as well as execution capability, commission rate, financial responsibility, and responsiveness. The determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution for each client account whose securities are traded. To this end, Schwab, the Specialist Managers and platform providers are required to periodically and systematically evaluate the performance of broker-dealers executing its transactions. MCCA in turn oversees a periodic review of the best execution policies and trading results obtained by the underlying Specialist Managers and by platform providers.

MCCA provides a customized investment strategy for each client based upon a model portfolio. MCCA tailors the model for each client taking into account its individual needs, including client requested restrictions, cash needs, tax considerations, and other items. Transactions in any particular client account may occur at a different time than in other client accounts. Depending on one client account's investment objectives and investment strategy, MCCA may provide investment advice and have portfolio transactions executed for one client account that may differ from the investment advice given and/or portfolio transactions executed for another client account, including accounts with similar investment objectives and strategy. MCCA's investment decisions are the product of many factors, including client specific investment guidelines as well as suitability considerations for a particular client account. Thus, a particular security for one or more client accounts may be bought when one or more other client accounts are selling that security, or purchases or sales of a security may occur at different times and at different prices that for other client accounts.

Investments in commingled funds made on a client's behalf, whether in mutual funds, exchange traded funds, limited partnerships or other structures, will include their own fees and expenses, including brokerage expenses, management and fund administration fees, among others. A complete explanation of all fees and expenses charged by commingled funds is contained in each funds' offering documents, which should be read carefully.

As part of its overall responsibility to monitor the nature and the quality of the portfolio management services provided by the Specialist Managers, MCCA and back office service providers employed by us review the level of brokerage commissions paid by client accounts and the overall quality of execution services obtained by the individual Specialist Managers. As a matter of policy, we do not receive any research or other benefits from brokers and dealers in consideration of client security transactions – so-called “soft dollar” arrangements. We do, however, obtain research, both through the internet and directly, from investment management organizations some of whom may, from time to time serve as Specialist Managers.

While it is MCCA's policy, as noted, not to utilize soft dollar research or services directly, certain of the Specialist Managers it engages to manage client assets do receive soft dollar benefits. MCCA reviews sub-manager soft dollar policies and usage as part of its periodic due diligence overview to ensure that sub-manager policies and usage are consistent with industry norms and best practices.

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$4 billion of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees

are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. By using another broker or dealer you may pay lower transaction costs. Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us.

Following is a more detailed description of Schwab’s support services:

**Services that benefit you.** Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

**Services that do not directly benefit you.** Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts and operating our firm. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party’s fees. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources.

**Our interest in Schwab’s services.** The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don’t have to pay for Schwab’s services. Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf based on the value of our clients’ assets in accounts at Schwab reaching certain thresholds.

The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab’s services and not Schwab’s services that benefit only us.

## Item 13 – Review of Accounts

On at least a quarterly basis, MCCA reviews Specialist Manager performance, client account performance and the appropriateness of client asset allocations. On an annual basis, our Chief Compliance Officer or a delegee compares client current asset allocations to their target asset allocations to ensure that it is within an acceptable variance.

Your accounts will be reviewed with you by the Investment Officer assigned to you. Only employees registered to give investment advice will review accounts with clients.

You will receive a monthly statement from a qualified third-party custodian that lists all account charges, including fees payable to MCCA, Specialist Managers and the custodian, each transaction that occurred in your account during the preceding month and securities positions in your account.

You will receive periodic written reviews by the investment manager assigned to you including economic highlights, a review of the portfolio performance, a review of Specialist Managers for your account and an overview of each asset category in which you have assets invested. This review will also examine portfolio objectives, characteristics and the underlying securities when relevant.

In addition to reports tailored to clients, MCCA issues a variety of general circulation materials for clients, consultants and prospects about its investments and investment processes. White papers and investment advisories are also provided on timely and newsworthy topics as appropriate. MCCA's communications are typically available on the firm's website, [www.millcreekcap.com](http://www.millcreekcap.com).

## **Item 14 – Client Referrals and Other Compensation**

MCCA may from time to time enter into arrangements pursuant to which persons refer clients to us (“Associates” of MCCA). These Associates may receive referral fees. All such arrangements are fully disclosed to applicable clients and will be designed to comply with the Investment Advisors Act of 1940. These Associates will not be employees of MCCA. Pursuant to a written agreement with us, Associates may generally receive a quarterly referral fee equal to a percentage of gross revenue actually received by us from the account introduced by the Associate. Any such referral fee will be paid by us and not you. The fee you pay for our services will not be higher or lower as a result of such referral fees. Associates will not render investment advice and may not be registered investment advisors.

Additionally, MCCA receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

## **Item 15 – Custody**

You will receive monthly statements from the qualified third-party custodian that holds and maintains your investment assets. We urge you to carefully review these statements and compare these official custodial records to the account information provide to you by us in review materials. Our account information may vary from custodial statements based on accounting procedures, reporting dates, dividends or valuation methodologies regarding certain securities.

MCCA is deemed to have custody of the pooled investment vehicles it manages and for which its related person MCSR GP LLC serves as general partner. An independent public accountant is engaged to audit the pooled investment vehicles within the required number of days under the SEC Custody Rule of the pooled investment vehicle's fiscal year end. Actual custody in all cases is maintained by a qualified custodian independent of MCCA.

## **Item 16 – Investment Discretion**

In a majority of its arrangements MCCA receives discretionary authority from its clients at the outset of an advisory relationship. This includes the authority to liquidate previous holdings, make decisions as to the appropriate allocation of assets among various asset classes and types of investment products and appoints one or more Specialist Managers to manage

a designated portion of the assets in a particular asset class, either directly or through investments in pooled vehicles managed by such Specialist Managers.

Specialist Managers will have full investment discretion with respect to the designated portion of the assets, including the authority to place securities trades for execution and to select brokers, dealers or other agents through which transactions for client portfolios will be effected. In all cases, however, such discretion is to be exercised in a manner consistent with client's stated investment objectives, investment policies, limitations and restrictions. At the outset of an advisory relationship with us, investment guidelines and restrictions that are acceptable to us, must be provided in writing.

MCCA's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made, among other restrictions.

## **Item 17 – Voting Client Securities; Business Continuity Plan**

As a matter of firm policy and practice, MCCA does not have any authority to and does not vote proxies on your behalf. Unless instructed in writing by you, all proxies solicited by, or with respect to, the issuers of securities in a portfolio by a Specialist Manager will be voted by or in accordance with instructions from such Specialist Manager or delegated to a qualified proxy voting service provider. We perform due diligence on the Specialist Managers and service providers who handle proxies for us.

Proxies solicited with respect to securities issued by a pooled investment vehicle or mutual fund will be voted by its sponsor or manager.

You will not receive proxies or other solicitations directly from the Specialist Managers or service providers. MCCA is not prepared to handle questions about a particular solicitation.

MCAA has a disaster recovery and business continuation plan in place to help the firm address potential emergencies. The program is designed to provide MCAA's most critical portfolio management, operations and computer system functions with a measure of protection against potential disasters. The goal of the program is to safeguard the assets of MCAA's clients, including client information, against major or minor external threats.

MCAA's disaster recovery program targets recoverability -- the ability of information systems to overcome any short- or long-term disruption; redundancy-- the duplication of key information systems processes to prevent loss of data; and reliability -- the assurance that MCAA staff members will be able to function immediately following most external problems and within 24 hours even after the most extreme problems.

MCAA engages in an ongoing process of upgrading and testing this program in an effort to ensure that it is capable of meeting its goals. Additional details on the specific elements of the program are available upon request.

## **Item 18 – Financial Information**

Registered Investment Advisers are required in this item to provide you with certain financial information or disclosures about MCCA's financial condition. MCCA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

**Item 1- Cover Page**

Richard W. Stevens

**610-941-7713**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Richard W. Stevens that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Richard W. Stevens  
09/18/1956

B.A., 1978, Lafayette College  
J.D., 1981, Rutgers School of Law  
L.L.M., 1985, Villanova Law School

Mill Creek Capital Advisors, LLC, Executive Chairman, 2018 - Present  
Mill Creek Capital Advisors, LLC, Chief Executive Officer, 2006 - 2017  
Hirtle, Callaghan & Co. Inc., Principal, 1998 -2006

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or his delegatee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Market and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Joshua S. Gross

**610-941-7714**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Joshua S. Gross that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Joshua S Gross  
07/24/1970

B.A., 1995, Rutgers University  
M.B.A, 1998, Penn State University

Mill Creek Capital Advisors, LLC, Chief Executive Officer 2018 - Present  
Mill Creek Capital Advisors, LLC, President, 2006 - 2017  
Hirtle, Callaghan & Co. Inc., Principal & Investment Officer, 1998 – 2006

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegatee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Thomas M. Chapin

**610-941-9795**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Thomas M. Chapin that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Thomas M. Chapin

02/14/1958

B.A., 1980, Dartmouth College

M.B.A., 1985, Dartmouth College-Amos Tuck School

Chartered Financial Analyst 1996

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

Mill Creek Capital Advisors, LLC, Investment Committee Chairman, 2021 - Present

Mill Creek Capital Advisors, LLC, Chief Investment Officer, 2006 - 2021

The Vanguard Group, Principal, 1985 –2006

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor’s supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Chapin reports to Rich Lunsford, who is the Mill Creek Capital Advisor's President and Chief Financial Officer and Josh Gross who is Mill Creek Capital Advisors Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and MCCA Strategic Asset Allocation review.

## **Item 1- Cover Page**

Michael Crook

**610-941-1363**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Michael Crook that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Michael Crook

04/16/1980

B.S., 2003, University of Georgia

M.A., 2004, New York University

Chartered Alternative Investment Analyst, 2008

Mill Creek Capital Advisors, LLC, Chief Investment Officer, 2020 – Present

UBS, Managing Director, 2010 – 2020

Barclays Wealth, Senior Vice President, 2008 – 2010

Lehman Brothers, Vice President, 2005 - 2008

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Crook reports to Rich Lunsford, who is the Mill Creek Capital Advisor's President and Chief Financial Officer and Josh Gross who is Mill Creek Capital Advisors Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and MCCA Strategic Asset Allocation review.

**Item 1- Cover Page**

Michael H. Jordan

**610-941-9794**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Michael H. Jordan that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have**

**any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Michael H. Jordan  
01/19/1970

B.A., 1992, University of Vermont

Mill Creek Capital Advisors, LLC, Investment Officer, 2006 - Present  
Morgan Stanley, First Vice President, 1992 -2006

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Jordan reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Richard M. Lunsford Jr.

**610-941-9793**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Richard M. Lunsford Jr. that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Richard M Lunsford, Jr.  
08/03/1977

B.S., 1999, University of Delaware  
Mill Creek Capital Advisors, LLC, President and Chief Financial Officer, 2018 - Present  
Mill Creek Capital Advisors, LLC, Chief Operating Officer, 2006 - 2017  
Hirtle, Callaghan & Co. Inc., Investment Officer, 2006  
Hirtle, Callaghan & Co. Inc., Analyst, 2002 - 2006

CFP®, 2005

Qualifications as a Certified Financial Planner requires:

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 - Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Lunsford is Mill Creek Capital Advisor's President and Chief Financial Officer. Mr. Lunsford reports to Josh Gross, who is Mill Creek's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Kevin J. Keating

**610-941-2015**

Mill Creek Capital Advisors, LLC

95 Morton Street

Ground Floor, Suite 19

New York, NY 10014

610-941-7700

**This Brochure Supplement provides information about Kevin J. Keating that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Kevin J Keating  
02/16/1979

B.S., B.A., 2001, Georgetown University

Mill Creek Capital Advisors, LLC, Investment Officer, 2009 - Present  
Goldman Sachs & Co., Financial Analyst, 2001- 2008

Chartered Financial Analyst, 2006

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

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## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 - Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Keating reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

David J. Logan

**610-941-7716**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about David J. Logan that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com)**

## Item 2- Educational Background and Business Experience

David J. Logan  
09/23/1975

B.S., 1997, Villanova University

Mill Creek Capital Advisors, LLC, Investment Officer, 2006 - Present  
Hirtle, Callahan & Co., Analyst, 2000- 2006

Chartered Financial Analyst, 2006

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

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## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Logan reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Ryan M. Campbell

**610-941-1366**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Ryan M. Campbell that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Ryan M Campbell  
10/10/1984

B.S., Bucknell University 2007  
MBA, Indiana University 2012

Mill Creek Capital Advisors, LLC, Investment Officer, 2017 - Present  
Threshold Group. LLC, Investment Analyst , 2014 – 2017  
Convergent Wealth Advisors. Investment Management Associate, 2012 – 2014  
Goldman Sachs, Senior Analyst 2007 – 2011

CFP®, 2014

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

Chartered Financial Analyst, 2017

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Campbell reports to Pat Burke, who is the Mill Creek Capital Advisor's Managing Director. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Cree There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

Walter C. Harris

**610-941-7700**

Mill Creek Capital Advisors, LLC

999 Vanderbilt Road

Suite 200

Naples, FL 34108

610-941-7700

**This Brochure Supplement provides information about Walter C. Harris that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Walter C Harris  
12/02/1960

B.A., 1983, University of North Carolina  
M.B.A., 1987, University of North Carolina

Mill Creek Capital Advisors, LLC, Investment Officer, 2007 - Present  
Westwood Group, Vice President, 2006- 2007  
Quanta Capital, Vice President, 2004 - 2006

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

Director of Harris Holdings, Inc.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Harris reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or his delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Katie Poole

**610-941-2004**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Katie Poole that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Katie Poole  
07/13/82

B.S., 2004, The Pennsylvania State University

CFP®, 2009

Qualifications as a Certified Financial Planner requires:

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

Mill Creek Capital Advisors, Investment Officer, 2012- Present

J.P. Morgan, Vice President, 2011-2012

Convergent Wealth Advisors, Senior Advisor, 2008-2011

Bank of America, Vice President, 2004-2008

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 - Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Ms. Poole reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegatee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

Brian A. Maxwell

**610-941-7700**

Mill Creek Capital Advisors, LLC

Foster Plaza 10

680 Anderson Drive

Suite 530

Pittsburgh, PA 15220

610-941-7700

**This Brochure Supplement provides information about Brian A. Maxwell that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Brian A. Maxwell  
05/08/1966

B.S.B.A 1988, Bowling Green State University

Mill Creek Capital Advisors, LLC, Investment Officer, 2011 - Present  
YP, LLC, Representative, 2002 – 2010

Chartered Financial Analyst, 1997

### **Chartered Financial Analyst (CFA®)**

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

Independent Trustee - Steward Capital Mutual Funds; Indiana, Pennsylvania

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Maxwell reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## Item 1- Cover Page

Sean Bannon

**412-347-1050**

Mill Creek Capital Advisors, LLC

Foster Plaza 10

680 Anderson Drive

Suite 530

Pittsburgh, PA15220

610-941-7700

**This Brochure Supplement provides information about Sean Bannon that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Sean Bannon  
07/13/1968

B.A. 1990, University of Notre Dame

Mill Creek Capital Advisors, LLC, Investment Officer, 2014 - Present  
Gallagher Fiduciary Advisors, Consultant, 1997-2014  
Federated Investors, Senior Quality Control Coordinator, 1990-1997

Chartered Financial Analyst, 2002

### **Chartered Financial Analyst (CFA®)**

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

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Accredited Investment Fiduciary, 2008

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Bannon reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

Samuel O. McFall

**610-598-0044**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Samuel O. McFall that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Samuel O. McFall  
04/21/1981

B.A., Rollins College, 2004

Chartered Financial Analyst 2013

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charter holder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

Mill Creek Capital Advisors, LLC, VP Investments, 2016- Present

Pitcairn, Senior Research Analyst, 2013-2016

The Bryn Mawr Trust Company, Investment Officer & Investment Analyst, 2011-2013

Brinker Capital, Business Analyst, 2006-2011

Delaware Investments, Client Service Consultant, 2004-2006

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 - Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. McFall reports to Michael Crook, who is the Mill Creek Capital Advisor's Chief Investment Officer. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations

of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

Patrick J. Burke

**610-941-7715**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Patrick J. Burke that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Patrick J. Burke  
04/08/1970

B.S., 1992, Saint Joseph's University  
Masters in Taxation, 1995, Villanova University  
MBA, 2000, University of Pennsylvania

Mill Creek Capital Advisors, LLC, Investment Officer, 2013 - Present  
The Vanguard Group, Principal, 1995-2013

CPA, 1994

CFP®, 1996

Qualifications as a Certified Financial Planner requires:

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

Chartered Financial Analyst, 1998

### **Chartered Financial Analyst (CFA®)**

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Burke reports to Josh Gross, who is the Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Robert M. Asklar Jr.

**610-200-0448**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Robert M. Asklar Jr. that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Robert M. Asklar Jr.  
01/26/1987

B.S.BA., 2010, Drexel University

Mill Creek Capital Advisors, LLC, Associate Advisor, 2015 - Present  
MyCIO, Senior Analyst, 2010-2015

CFP®, 2013

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 - Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Asklar reports to Dave Logan, who is the Mill Creek Capital Advisor's Investment Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. . All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

## **Item 1- Cover Page**

Stephen J. Waltrich

**610-941-2018**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Stephen J. Waltrich that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Stephen J. Waltrich  
01/30/1975

BA, 1997, Penn State University  
MBA, 2001, LaSalle University

Mill Creek Capital Advisors, LLC, Chief Operations Officer, 2018 - Present  
Mill Creek Capital Advisors, LLC, Senior Vice President of Operations, 2015 - 2017  
SEI Investments, Director of Middle Office Operations, 2013-2015  
Turner Investment Partners, Director of Operations, 1999-2013  
The Vanguard Group, Large Transaction Administrator, 1997-1999

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Mr. Waltrich reports to Richard Lunsford, who is the Mill Creek Capital Advisor's President and Chief Financial Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

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**Item 1- Cover Page**

Ann Finnerty

**610-243-1880**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Ann Finnerty that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Ann Finnerty  
05/15/90

B.S., 2012, West Chester University of Pennsylvania

Mill Creek Capital Advisors, Associate Advisor, 2016 – Present  
The Vanguard Group, Flagship Service, 2014 - 2016  
Volunteer Income Tax Associate, 2013

CFP®, 2014

Qualifications as a Certified Financial Planner requires:

- Bachelor's degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Ms. Finnerty reports to Katie Thomas and Kevin Keating who are Mill Creek Capital Advisor's Investment Officers. There are two investment professionals per client relationship. All investment related activity is approved by both. . All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

**Nora Pickens**

**610-941-2003**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Nora Pickens that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Nora Pickens  
02/09/82

B.A 2004, Brown University

MBA, 2010, Yale School of Management

Chartered Alternative Investment Analyst 2019

Mill Creek Capital Advisors, LLC, Vice President, Investments, 2017- Present

FS Investments, Director, Fund Strategy, 2016-2017

Standard & Poor's, Director, US Energy Infrastructure 2010-2016

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Ms. Pickens reports to Michael Crook who is the Mill Creek Capital Advisor's Chief Investment Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Market and Mill Creek Capitals Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Jill Jokelson

**610-941-2013**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Jill Jokelson that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## **Item 2- Educational Background and Business Experience**

Jill Jokelson  
10/5/72

B.A, 1994, University of Pennsylvania  
MBA,2000, The Wharton School, University of Pennsylvania

Mill Creek Capital Advisors, Vice President, 2018 – Present  
Goldman Sachs & Co., Private Wealth Advisor, 2014-2017  
The Warton School, MBA Lecturer, 2012-2013  
The Wharton School, Auxiliary Reader, 2008-2012  
Legg Mason Wood Walker, Investment Banking Associate, 2000-2001  
Anderson Consulting, Consultant, 1994-1998

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Ms. Jokelson reports to Katie Thomas and Kevin Keating, who are Mill Creek Capital Investment Officers. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

**Item 1- Cover Page**

Adam N. Heller

**610-200-5385**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

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## Item 2- Educational Background and Business Experience

Adam Heller  
2/1/93

B.S, 2015, University of Florida

Mill Creek Capital Advisors, Investment Analyst, 2018 – Present  
Graham Partners Inc., Private Equity Analyst, 2016-2018  
Houlihan Lokey Inc., Junior Analyst, 2015 – 2016  
Franklin Square Capital Partners LLC, Intern, 2014 -2014

CFP®, 2020

Qualifications as a Certified Financial Planner requires:

- Bachelor’s degree from an accredited college
- 3 years of full-time personal financial planning experience
- Complete a CFP-board registered program
- Pass the CFP Certification Examination
- Continuing Education of 30 hours every 2 years

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## Item 5 - Additional Compensation

None. Mill Creek Capital Advisor’s supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## Item 6 - Supervision

Mr. Heller reports to Joshua Gross who is Mill Creek Capital Advisor’s Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor’s Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor’s general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor’s client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

### **Item 1- Cover Page**

Jaclyn Stumpo

**610-941-1369**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

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## **Item 2- Educational Background and Business Experience**

Jaclyn Stumpo  
05/25/1988

B.S. 2010, West Chester University

Mill Creek Capital Advisors, LLC, Client Relationship Advisor, 2017 - Present  
The Vanguard Group, Participant Services Administrator, 2011-2016

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## **Item 4 - Other Business Activities**

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sale, client referrals, or new accounts.

## **Item 6 - Supervision**

Ms. Stumpo reports to Kevin Keating and Katie Poole , who are Mill Creek Capital Advisor Investment Officers. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

On an annual basis the CCO or her delegee compares a client's actual asset allocation to their target allocation to ensure that it is within a 10% variance. There is a quarterly investment committee meeting to discuss investment models and allocations. There is a mandatory Monthly Capital Markets and Mill Creek Capital Advisor's Strategic Asset Allocation review.

### **Item 1- Cover Page**

Gretchen Regan

**610-941-1367**

Mill Creek Capital Advisors, LLC

Eight Tower Bridge

161 Washington Street, Suite 1500

Conshohocken, PA 19428

610-941-7700

**This Brochure Supplement provides information about Gretchen Regan that supplements the Mill Creek Capital Advisors, LLC Brochure. You should have received a copy of that Brochure. Please contact the Firm if you did not receive Mill Creek Capital Advisors, LLC's Brochure or if you have any questions about the contents of this supplement. Additional information about our firm is available on our website at [www.millcreekcap.com](http://www.millcreekcap.com).**

## Item 2- Educational Background and Business Experience

Gretchen Regan  
04/20/1972

B.S. 1994, Pennsylvania State University

Chartered Financial Analyst, 2003

### Chartered Financial Analyst (CFA®)

Qualification as a CFA® charterholder requires:

- Successful completion of Levels I, II, and III examinations.
- At least four years of acceptable professional work experience related to the investment decision-making process. This may be accrued prior to, during, or after completing the exams. Membership in CFA Institute and application for membership with a CFA Institute society.
- Agreement to comply with, among other things, the CFA Institute conditions, requirements, policies, and procedures as defined in the CFA Institute Articles of Incorporation, Bylaws, and Code of Ethics and Standards of Professional Conduct.
- Fulfillment of local CFA Institute society requirements, which vary by society.
- Submission of an annual Professional Conduct Statement and annual membership dues.

CFA® and Chartered Financial Analyst® are registered trademarks owned by the CFA Institute.

Mill Creek Capital Advisors, LLC, Vice President and Relationship Manager, 2021 - Present

Hotaling Investment Management, Investment Advisor, 2019 – 2021

Chartwell Investment Partners, Quantitative Analyst, 2015-2019

## Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

## Item 4 – Other Business Activities

No information is applicable to this Item.

## **Item 5 - Additional Compensation**

None. Mill Creek Capital Advisor's supervised persons do not receive bonuses or additional compensation that is based on the number of sales, client referrals, or new accounts.

## **Item 6 - Supervision**

Ms. Regan reports to Josh Gross, who is Mill Creek Capital Advisor's Chief Executive Officer. There are two investment professionals per client relationship. All investment related activity is approved by both. All investment professional activities are also monitored by Mill Creek Capital Advisor's Compliance team personnel. Mill Creek Capital Advisors has adopted a formal compliance program designed to prevent, detect and correct any actual or potential violations of the Investment Advisors Act of 1940, as amended, and related laws and regulations. Mill Creek Capital Advisor's general counsel & chief compliance officer, John Canning may be reached at 610-941-7700. In addition, all client accounts are frequently reviewed by Mill Creek Capital Advisor's client service and other personnel for investment guideline compliance, performance, and other purposes.

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## Exhibit to ADV Part 2B

### **CFA Institute Financial Adviser Statement**

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.