

**FORM ADV PART 2A
DISCLOSURE BROCHURE**



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This brochure provides information about the qualifications and business practices of Ascent Fintech LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 630-456-1600. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Ascent Fintech LLC (CRD #316080) is available on the SEC's website at www.adviserinfo.sec.gov

March 30, 2022

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update:

- We implemented a new plan setup fee for our Retirement Plan Services.
 - The maximum annual fee for Retirement Plan Services is 0.50%
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Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Ascent Fintech LLC (“Ascent”) is a privately-held registered investment advisory firm. Ascent was founded and began offering advisory services in 2021. Monarch Bhatt and Rupam Patel each own 50% of Ascent. Monarch Bhatt is Chief Compliance Officer. Rupam Patel will not offer advisory services to clients of Ascent.

Ascent provides advisory services to individuals, families, pension and retirement plans, and institutions. Ascent’s services are summarized below as: I) Asset Management Services, II) Financial Planning and Consulting Services, and III) ERISA and Retirement Plan Services.

Types of Advisory Services

ASSET MANAGEMENT

Ascent provides asset management services to its advisory services Clients. Ascent will review and analyze each Client’s specific investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. Asset management services include, but are not limited to, taxable, tax-deferred, tax-exempt, IRA, and investment-only retirement accounts, and are provided on either a discretionary or non-discretionary basis.

Discretionary

When the Client provides Ascent with discretionary authority, the Client will sign a limited trading authorization or equivalent. Ascent will have the authority to execute transactions in the account without seeking Client approval on each transaction.

PROJECT-BASED FINANCIAL PLANNING AND CONSULTING

Project-Based Financial Planning services include a comprehensive evaluation of an individual's current and future financial condition, which will be analyzed by using currently known variables to predict future cash flows, asset values and withdrawal plans. Among the variables Ascent will use in developing financial plans are current net worth, tax liabilities, asset allocation, and future retirement and estate plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** A review of an individual's or family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring at a desired age, and leaving a legacy. Financial goals should be quantified and expressed as milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan, which determines how much can be set aside each month for debt repayment, savings and investing.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities, including but not limited to a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** A plan identifying risk exposures and providing the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.

- **Long-term investment plan:** A plan including a customized asset allocation strategy based on specific investment objectives and a risk profile. The investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** A strategy identifying ways to minimize taxes on personal income to the extent permissible under the tax code. Where appropriate, the strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Assisting with updating accounts, reviewing beneficiaries for retirement accounts and life insurance, providing a second look at current estate planning documents, and prompting Clients to update their plans when the legal environment changes or when they have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of Ascent and the interests of the Client, the Client is under no obligation to act upon Ascent's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Ascent. Financial plans will be completed and delivered inside of sixty (60) days, contingent upon timely receipt of all required documentation.

RETIREMENT PLAN SERVICES

Ascent provides services to qualified and non-qualified retirement plans and their sponsors and fiduciaries. Services offered vary depending on the scope of services requested by the Client. Each engagement is unique and the scope of services will be identified in an appropriate services agreement between Ascent and the Client. The services provided to a Client in a specific engagement may include one or more non-fiduciary consulting services, limited-scope ERISA 3(21) fiduciary services, and/or ERISA 3(38) investment manager services. Ascent provides services to a variety of retirement plans, including but not limited to 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and non-qualified deferred compensation plans. Ascent may act as either a non-fiduciary consultant or an ERISA 3(21) or 3(38) fiduciary advisor. These services are described in more detail below.

Non-Fiduciary Consulting Services. Ascent provides a variety of non-fiduciary consulting services to plan sponsors, including:

- Reviewing and making recommendations to plan sponsors regarding plan design and implementation;
- Assisting with group enrollment meetings designed to increase retirement plan participation among the plan sponsor's employees;
- Educating participants regarding investments and financial concepts;
- Assistance with evaluating and monitoring current service providers;
- Preparing and distributing requests for proposal, assisting with finalist interviews, and making recommendations regarding selection of service providers.

Ascent may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Ascent and Client.

Ascent also provides educational workshops targeted to each Client's needs, which may involve a broad range of financial planning and investment education topics. Our workshops

may address education of plan fiduciaries regarding their duties and obligations under ERISA and education of plan participants about general investment information and the investment alternatives available to them under a specific plan. Ascent's assistance in education of the Plan participants shall be consistent with and limited to the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). Ascent does not provide fiduciary advice as defined by ERISA 3(21)(A)(ii) to plan participants, including the prudence or desirability of any specific investment option or combination of investment options for a particular participant or beneficiary under a plan.

Limited Scope ERISA 3(21) Fiduciary Services. Ascent may serve as a limited scope ERISA 3(21) fiduciary providing advice and assistance to plan sponsors. These fiduciary services may include:

- Providing investment advice to the Client regarding asset classes and investment alternatives to be used for or made available in the plan, in accordance with the plan's investment policies and objectives;
- Assisting the Client with selecting, monitoring, and replacing the core investment funds made available to participants in self-directed defined contribution and non-qualified deferred compensation plans, including ensuring those options satisfy the criteria of offering a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder;
- Assisting the Client in the development of an investment policy statement ("IPS"), which establishes the investment policies and objectives for the Plan;
- Advising the Client regarding the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).
- Monitoring selected investment options by preparing periodic investment reports documenting investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS;
- Making recommendations to maintain, remove or replace investment options; and
- Meeting with Client on a periodic basis to discuss the reports and the investment recommendations.

In providing these services, Ascent acknowledges that it is a fiduciary as defined in ERISA section 3(21)(A)(ii) and that it has a duty to act in the best interest of the Client. However, in each case, the Client/plan sponsor is still ultimately responsible for all decisions made, including but not limited to those regarding the initial selection, retention, removal and addition of investment options, the establishment of policies and objectives, and the adoption and amendment of the IPS, though Ascent can assist the plan sponsor with effectively delegating responsibility by following a diligent process and monitoring subsequent performance. However, the Client retains the sole responsibility to provide all required notices and communications to plan participants.

ERISA 3(38) Investment Manager. Ascent can also act as an ERISA 3(38) Investment Manager. In this role, it assumes discretionary management and control of all or a part of a given retirement plan's assets. Ascent is solely responsible and liable for the selection, monitoring, and replacement of the plan's investment options.

ERISA 3(38) discretionary fiduciary services include, but are not limited to:

- Assuming the discretionary authority and fiduciary responsibility for decisions regarding the initial selection, monitoring, retention, removal, and addition of investments or investment options, in accordance with the Plan's investment policies and objectives as expressed in its IPS.
- Selecting a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. As with ERISA 3(21) limited scope services, the Client retains the sole responsibility to provide all required notices and communications to plan participants.

Ascent may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Ascent and Client.

Excluded Assets. Ascent will not provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles);
- Cryptocurrency investments, other than publicly traded broad-based investment funds; or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Ascent under the ERISA Agreement. Specific services will be outlined in detail to each plan in the ERISA 408(b)(2) disclosure.

Recordkeeping and plan administration services are provided by an unaffiliated third-party administrator of the plan's choosing. Accounts may be maintained with the custodian or trustee of the plan sponsor's preference.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Ascent does not sponsor any wrap fee programs.

Client Assets under Management

Ascent reports \$455,127 in discretionary Assets Under Management as of December 31, 2021. has no Client assets under management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Fees and payment are based on the type and scope of services provided, the term of services, etc. and will be detailed in the services agreement(s) with the Client. Payment of compensation may be made by Client direct payment, through the Client's written authorization to deduct fees directly from the Client's account or retirement plan assets, or in any other manner agreed upon between Client and Ascent. Ascent does not retain any compensation, commission, or any other form of direct compensation from any mutual fund or other entity in connection with these services; should Ascent receive any such compensation, it will be disclosed and either directly credited against the fees otherwise payable under the engagement or refunded to the Client or retirement plan, as appropriate. The information below is a summary of the fees and compensation typically charged for each type of service.

ASSET MANAGEMENT SERVICES

Ascent offers direct asset management services to advisory Clients. Asset-based fees will be billed quarterly, in arrears, based upon assets under management as of the close of business on the last business day of the previous quarter. The fee structure for assets under management is a progressive scale with a decreasing percentage charged to higher asset levels:

Blended Portfolios (including individual equities, mutual funds, and ETFs):

Assets Under Management	Annual Fee	Quarterly Fee
\$0 - \$100,000	1.00%	.25%
\$100,000.01 - \$500,000	.90%	.225%
\$500,000.01 - \$1,000,000	.80%	.20%
\$1,000,000.01 - \$3,000,000	.70%	.175%
\$3,000,000.01 - \$5,000,000	.60%	.15%
Amounts exceeding \$5,000,000.01	.50%	.125%

As a blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. Ascent may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For example (based on monthly/quarterly billing period):

Client with \$1,000,000 under management would pay \$8,600.00 on an annual basis.

<u>AUM</u>	<u>Quarterly fee</u>	<u>Total</u>
First \$100,000	x 0.25% =	\$250.00
Next \$400,000	x 0.225% =	\$900.00
Next \$500,000	x 0.20% =	<u>\$1,000.00</u>
Grand total for the quarter		\$2,150.00

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing an Investment Advisory Agreement with Ascent with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Ascent with thirty (30) days written notice to Client and by the Client at any time with written notice to Ascent. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Ascent. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

PROJECT-BASED FINANCIAL PLANNING AND CONSULTING

Ascent performs financial planning and consulting projects on an hourly fee basis of \$250 per hour. The Client will be provided with an estimated fee before Ascent provides services. Services are completed and delivered inside of sixty (60) days contingent upon timely delivery of all required documentation. Fees for financial plans are due upon the delivery of the completed financial plan or conclusion of services. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five

(5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Ascent. Ascent reserves the right to discount the fee should the Client implement the plan through Ascent.

There may be other direct costs chargeable to cover execution, brokerage, and custodial costs. Any such fees will be disclosed in advance and detailed in the engagement agreement.

RETIREMENT PLAN SERVICES

As described above, Ascent provides two general categories of services to retirement plans: non-fiduciary consulting services and fiduciary investment advisory or management services. The fee structure for both is described below.

Non-Fiduciary Consulting Services. Ascent charges an hourly fee of \$250 per hour for plan consultation, implementation, selection, evaluation, vendor analysis, plan design, plan census survey, and all other non-fiduciary consulting services. In certain circumstances, such as project-based services, Ascent may instead be compensated on a fixed fee basis, determined by the complexity and scope of the engagement, the number of accounts or plans involved, *etc.* The Client will be provided with an estimated fee before Ascent commences providing services, and all compensation and fees will be detailed in the services agreement between Ascent and the Client.

Fiduciary Investment Advisory and Management Services. Fees for this service consist of an initial setup fee of either \$250 per hour, or a fixed \$1,500 fee based on the client's needs and expected complexity of plan set up. Ongoing fees are either based upon a percentage of the Plan Assets or as a flat fee, and will not exceed 0.50% per annum. The annual fee is negotiable. Fees may be charged quarterly or monthly in arrears or in advance based on the

assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Ascent shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle. The fee schedule, which includes compensation of Ascent for the services, is described in detail in Schedule A of the Retirement Plan Services Agreement.

Ascent does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If Ascent does receive additional compensation, Ascent will disclose the compensation, the reason for and basis of the compensation, and the payer of compensation. Ascent will offset any additional compensation against the agreed-upon fees.

Payment of Compensation

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to Ascent.

Fees for Retirement Plan services will either be deducted from Plan assets or paid directly to Ascent by Client, as determined by the plan sponsor/Client. Ascent has no responsibility or liability for determining which fees are properly payable from plan assets. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

Custodians may charge transaction fees other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Ascent does not receive any compensation from these fees. All of these fees are in addition to Ascent's compensation. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Ascent.

Fees for ERISA 3(21) and 3(38) services may be billed in advance.

External Compensation for the Sale of Securities to Clients

Ascent does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Ascent.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Ascent does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Ascent to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

Ascent generally provides investment advice to individuals, high net worth individuals, or business entities. Client relationships vary in scope and length of service.

Account Minimums

Ascent does not require a minimum to open an account.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to

implement this strategy, then it changes the very cycles these investors are trying to exploit. In developing a financial plan for a Client, Ascent's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Ascent. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Ascent:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class

or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.

- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid- cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Derivatives Risk:* Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited

trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

Item 9: Disciplinary Information

Criminal or Civil Actions

Ascent and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Ascent and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Ascent and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Ascent or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Ascent is not registered as a broker-dealer and no affiliated representatives of Ascent are registered representatives of a broker-dealer.

Monarch Bhatt Futures or Commodity Registration

Neither Ascent nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Monarch Bhatt is a Senior Financial Analyst with Roadrunner Transportation services. Approximately 50% of his time is spent in this activity. Mr. Bhatt is partial owner and Executive Vice President of Ascent Infotech LLC.

These practices represent conflicts of interest because there may be crossover clients. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any additional services. Clients have the option to purchase these services through another company of their choosing. See Item 10 for more details.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Ascent does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of Ascent have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Ascent affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Ascent. The Code reflects Ascent and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Ascent's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Ascent may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Ascent's Code is based on the guiding principle that the interests of the Client are our top priority. Ascent's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Ascent will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Ascent and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Ascent and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Ascent with copies of their brokerage statements.

The Chief Compliance Officer of Ascent is Monarch Bhatt. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Ascent does maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, the firm and affiliated persons are required to disclose all reportable securities transactions as well as provide Ascent with copies of their brokerage statements.

The Chief Compliance Officer of Ascent is Monarch Bhatt . He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Ascent will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Ascent will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Ascent relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Ascent. Ascent does not receive any portion of the trading fees.

Ascent will recommend the use of Charles Schwab.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Ascent from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Ascent has no formal soft dollar arrangements, Ascent may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Ascent receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Ascent. Ascent cannot ensure that a particular client will benefit from soft dollars or the client’s transactions paid for the soft dollar benefits. Ascent does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Ascent receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Ascent has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

Ascent does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregating Securities Transactions for Client Accounts

Ascent is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Ascent. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory**Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of Ascent. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Ascent suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Ascent's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Ascent does not provide additional reports to Clients.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Ascent does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Ascent does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Ascent.

Ascent is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Ascent

Item 16: Investment Discretion

Discretionary Authority for Trading

If applicable, Client will authorize Ascent discretionary authority, via the advisory agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize Ascent discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Ascent allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Ascent in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Ascent does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

Ascent does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Ascent will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because Ascent does not serve as a custodian for Client funds or securities and Ascent does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Ascent has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Ascent has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons: Rupam Patel

- Year of birth: 1991

Item 2 - Educational Background and Business Experience

Educational Background:

- Illinois Institute of Technology; Bachelor of Science in Chemical Engineering; 2016
- Southern New Hampshire University; Master of Science in Information Technology Management with a Concentration in Cyber Security; 2018

Business Experience:

- Ecolab Inc; Security Engineer-03/2022-Present
- Ascent Fintech LLC; Executive Vice President; 05/2021-Present
- Ascent Infotech LLC; President; 07/2021 – Present
- Entelli Consulting LLC; Infrastructure Engineer; 07/2021 – 03/2022
- Lending Solutions, Inc.; Network Security Administrator; 02/2018-07/2021
- Eshow/Netronix Corporation; Information Technology Specialist; 07/2016-02/2018
- Full time student; 2010-2016

Outside Business Activities

Rupam Patel is employed as a Security Engineer at Ecolab Inc. Approximately 50% of his time is spent on this activity. Mr. Patel is President of Ascent Infotech LLC. Approximately 45% of his time is spent in this activity. Additionally, Mr. Patel is Executive Vice President of Ascent Fintech LLC. Approximately 5% of his time is spent in this activity.

These practices represent conflicts of interest because there may be crossover clients. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any additional services. Clients have the option to purchase these services through another company of their choosing. See Item 10 for more details.

Performance Based Fee Description

Neither Ascent nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither Ascent nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. An investment or an investment-related business or activity;
 - b. Fraud, false statement(s) or omissions;
 - c. Theft, embezzlement or other wrongful taking of property;
 - d. Bribery, forgery, counterfeiting, or extortion;
 - e. Dishonest, unfair or unethical practices.

2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. An investment or an investment-related business or activity;
 - b. Fraud, false statement(s) or omissions;
 - c. Theft, embezzlement or other wrongful taking of property;
 - d. Bribery, forgery, counterfeiting, or extortion;
 - e. Dishonest, unfair or unethical practices.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Monarch Bhatt, CFP[®], CPA



Office Address:
182 South Waters Edge
Drive, Apt 302
Glendale Heights, IL 60139

Tel: 630-456-1600

mbhatt@ascentwithus.com

This brochure supplement provides information about Monarch Bhatt and supplements the Ascent Fintech LLC brochure. You should have received a copy of that brochure. Please contact Monarch Bhatt if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Monarch Bhatt (CRD #7420605) is available on the SEC's website at www.adviserinfo.sec.gov.

March 30, 2022

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Monarch Bhatt, CFP®, CPA

- Year of birth: 1991
-

Item 2 - Educational Background and Business Experience

Educational Background:

- DePaul University; Master of Science in Finance; 2021
- DePaul University; Bachelor of Science in Accounting; 2015

Business Experience:

- Ascent Fintech LLC; Managing Member/Investment Advisor Representative/Chief Compliance Officer; 05/2021-Present
- Ascent Infotech LLC; Executive Vice President; 07/2021 - Present
- Roadrunner Transportation Services; Senior Financial Analyst; 03/2021-Present
- MBTAC Financial Services, LLC; Partner; 07/2020-08/2021
- Oak 22 Partners, LLC; President; 03/2019 -12/2020
- Inland Real Estate Group; Investment Analyst; 12/2018-06/2020
- MBTAC LLP; Partner; 12/2018-12/2020
- Full Time Student; 07/2016 – 12/2018
- PWC, LLP; Tax Associate; 01/2016 – 07/2016
- Full Time Student; 08/2010 – 01/2016

Professional Certifications

Monarch Bhatt has earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Public Accountant (CPA): A Certified Public Accountant is licensed by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- Bachelor’s degree from an accredited college or university with a concentration in accounting.
- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA.
- Successful completion of the CPA Certification Exam.
- Follow a rigorous Code of Professional Conduct which requires they act with integrity, objectivity, due care, competence, and fully disclose conflicts of interest.
- In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period, or 120 hours over a three year period).

Item 3 - Disciplinary Information

- A. Mr. Bhatt has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property,

- bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Bhatt never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Bhatt has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Bhatt has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Monarch Bhatt is a Senior Financial Analyst with Roadrunner Transportation services. Approximately 50% of his time is spent in this activity. Mr. Bhatt is partial owner and Executive Vice President of Ascent Infotech LLC. Approximately 5% of his time is spent in this activity.

These practices represent conflicts of interest because there may be crossover clients. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any

additional services. Clients have the option to purchase these services through another company of their choosing. See Item 10 for more details.

Item 5 - Additional Compensation

Monarch Bhatt does not receive any performance-based fees.

Item 6 - Supervision

Since Monarch Bhatt is the Chief Compliance Officer and sole investment adviser representative of Ascent he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at mbhatt@ascentwithus.com or 630-456-1600.

Item 7 - Requirements for State-Registered Advisors

- A. Mr. Bhatt has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Mr. Bhatt has never been the subject of a bankruptcy petition.