

December 31, 2024

Sir/Madam:

We have received your request for information regarding material changes in internal controls related to our Brokered Certificate of Deposit Program (SimpliCD) through December 31, 2024. GBQ Partners LLC prepared the latest SOC-1 Type II for these services and the report is dated February 4, 2025. This report includes tests of operating effectiveness for the year ending September 30, 2024.

Primary Financial Company LLC recognizes the need to maintain an appropriate internal control environment and report upon the effectiveness, as well as material changes to its internal controls. As of December 31, 2024, I am not aware of any *material changes* in our control environment that would adversely affect the Auditor's Opinion reached in the September 30, 2024 report for the above named SOC-1 Type II.

You should also be aware that Primary Financial Company LLC, as a normal part of its operations, continually updates its services and technology as appropriate. In addition, the controls for all of Primary Financial Company LLC were designed with certain responsibilities required of the system users (see Control Objectives and Related Controls in the SOC-1 Type II report). Primary Financial Company LLC controls must always be evaluated in conjunction with an assessment of the strength of these user controls.

Finally, in order to conclude upon the design and effectiveness of internal controls for Primary Financial Company LLC, you must refer to the current SOC-1 Type II report. This letter is not intended to be a substitute for that report.

Sincerely,



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