

# **Avaii Wealth Management, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: October 14, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Avaii Wealth Management, LLC (“Avaii” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (920) 214-1212.

Avaii is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Avaii to assist you in determining whether to retain the Advisor.

Additional information about Avaii and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 298165.

**Avaii Wealth Management, LLC**  
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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Avaii. For convenience, we have combined these documents into a single disclosure document.

Avaii believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Avaii encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The Advisor has made a change regarding their Chief Compliance Officer ("CCO"). The CCO is now Aaron Skurr.

The Advisor has started providing 3(21) and 3(38) retirement plan advisory services to its Clients. Please see Item – 4 and 5 for more information.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 298165. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (920) 214-1212.

## Item 3 – Table of Contents

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Item 1 – Cover Page	1
Item 2 – Material Changes	
Item 3 – Table of Contents	
Item 4 – Advisory Services	
4A. Firm Information	
4B. Advisory Services Offered	
4C. Client Account Management	
6D. Wrap Fee Programs	
6E. Assets Under Management	
Item 5 – Fees and Compensation	
6A. Fees for Advisory Services	
6B. Fee Billing	
8C. Other Fees and Expenses	
8D. Advance Payment of Fees and Termination	
8E. Compensation for Sales of Securities	
Item 6 – Performance-Based Fees and Side-By-Side Management	
Item 7 – Types of Clients	
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	
10A. Methods of Analysis	
10B. Risk of Loss	
Item 9 – Disciplinary Information	
Item 10 – Other Financial Industry Activities and Affiliations	
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	
12A. Code of Ethics	
12B. Personal Trading with Material Interest	
12C. Personal Trading in Same Securities as Clients	
12D. Personal Trading at Same Time as Client	
Item 12 – Brokerage Practices	
12A. Recommendation of Custodian[s]	
12B. Aggregating and Allocating Trades	
Item 13 – Review of Accounts	
13A. Frequency of Reviews	
13B. Causes for Reviews	
13C. Review Reports	
Item 14 – Client Referrals and Other Compensation	
14A. Compensation Received by Avaii	
14B. Client Referrals from Solicitors	
Item 15 – Custody	
Item 16 – Investment Discretion	
Item 17 – Voting Client Securities	
Item 18 – Financial Information	
Form ADV 2B – Brochure Supplements	
Privacy Policy	16
	28

## Item 4 – Advisory Services

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### A. Firm Information

Avaii Wealth Management, LLC (“Avaii” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Wisconsin in July 2018 and launched as a registered investment advisor in September 2018. Avaii is owned and operated by Christian J. Doule (Managing Member and Wealth Management Advisor), Jeffrey J. Rainer (Member and Wealth Management Advisor), and Joel Blattner (Member, Director of Investments). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Avaii.

For more information regarding this disclosure Brochure, please contact Aaron Skurr, the Chief Compliance Officer, at (920) 214-1212.

### B. Advisory Services Offered

Avaii provides advisory services to individuals, families, trusts, estates, charitable organizations, businesses and retirement plans (each referred to as a “Client”). Avaii provides individualized services to each Client, which are determined during initial conversations and updated over the course of the relationship as needed or requested by the Client.

Avaii serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Avaii works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Avaii will then construct a portfolio, consisting of primarily of active and passive mutual funds, exchange-traded funds (“ETFs”), individual equity securities, individual fixed income securities and other types of investments, as appropriate to meet the needs of each Client. Evaluation of legacy investments will include a review of portfolio fit, tax situation and other considerations.

Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor. Avaii will construct, implement and monitor the portfolio on a discretionary basis with respect to the Client’s investment policy statement. At no time will Avaii accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices and Item 15 - Custody.

#### Use of Independent Managers

Avaii may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers’ strategies and target allocations remain aligned with its clients’ investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures).

#### Retirement Plan Advisory Services

Avaii provides advisory services on behalf of company retirement plans (each a “Plan”) and the company/sponsor (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Avaii may provide investment advisory services on behalf of the Plan and Plan Sponsor, which may be in either a 3(21) or 3(38) context depending on whether or not the Advisor is also providing discretionary investment management over the Plan assets. For 3(38) services, the Advisor shall have the discretion to select the investments for the Plan and/or make investment decisions on behalf of Plan Participants.

These services are provided by Avaii serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Avaii’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Financial Planning Services

Financial Planning Services are at the core of the Client relationship with Avaii. Financial planning is an evaluation of a Client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans while also understanding personal values, goals and objectives. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the Client.

Avaii will provide financial planning and consulting services to Clients pursuant to a written financial planning agreement. Services are offered in several areas depending on the Client’s goals, objectives and financial situation. Generally, such financial planning services will involve a written report which provides the Client with a detailed financial plan to assist the Client in achieving his or her financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, financial position, tax considerations, employee benefits, investment analysis, insurance analysis, retirement analysis, death and disability considerations, and estate planning.

Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly by the Client.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. Implementation of financial planning recommendations is entirely at the Client’s discretion. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. Avaii will work with Clients to implement recommendations and referrals to other professionals may be made where appropriate to meet the Client’s needs.

### C. Client Account Management

Prior to engaging Avaii to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Avaii, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's goals and objectives.
- Portfolio Construction – Avaii will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Avaii will provide investment management and ongoing oversight of the Client's investment portfolio. Avaii will review Client portfolios at least annually.
- Financial Planning – Avaii provides initial and ongoing planning services, to assist Clients in meeting the financial goals.

### D. Wrap Fee Programs

Avaii does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Avaii.

### E. Assets Under Management

As of December 31, 2018, Avaii manages \$114,786,235 in Client assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

### A. Fees for Advisory Services

#### Investment Management Services

Investment advisory fees are paid either monthly or quarterly, in advance of each calendar quarter, (the "Billing Period"), pursuant to the terms of the investment advisory agreement. Fees are calculated and deducted in advance of each Billing Period quarter based on the market value of assets under management at the end of the prior month or quarter. Fees are based on the following schedule:

Assets Under Management	Annual Fee (%)
Up to \$500,000	1.25%
\$500,001 to \$750,000	1.15%
\$750,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
Over \$2,000,000	0.75%

Client's may select the fixed fee option when paying for advisory services, pursuant to the terms of the investment advisory agreement. Fixed advisory fees range from \$5,000 to \$30,000 annually, depending on the complexity of the engagement, financial planning needs, frequency of reviews and meetings, and size of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first Billing Period of service is prorated from the inception date of the account[s] to the end of the first Billing Period. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held

in accounts managed by Avaii will be independently valued by the Custodian. Avaii will not have the authority or responsibility to value portfolio securities.

The Client may make additions or withdrawals from the account[s] at any time, subject to the Advisor's right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Avaii, subject to the usual and customary securities settlement procedures. However, withdrawals from the Client's account[s] may impede the Advisor's ability to implement the investment strategy designed for the Client. Clients are advised that when such securities are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications. An adjustment will be made in the next billing period to reflect the fee difference.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Use of Independent Managers

For Client account[s] implemented through an Independent Manager, the Client's overall fees will sometimes include Avaii's investment advisory fee (as noted above) plus advisory fees and/or platform fees charged by the Independent Manager[s], as applicable. The Independent Manager may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s]. In such instances, Avaii will not charge its fee separately on those assets.

#### Retirement Plan Advisory Services

Fees for 3(21) and 3(38) retirement plan advisory services are charged an annual asset-based fee of up to 1.25%, billed in advance, pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar month. Fees may be negotiable depending on the size and complexity of the Plan. Fees in the first month of the engagement are prorated from the effective date of the Agreement to the end of the first month. Fees range are generally based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Fee (%)</b>
Up to \$500,000	1.25%
\$500,001 to \$750,000	1.15%
\$750,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
Over \$2,000,000	0.75%

The Advisor may offer a fixed annual fee for its 3(21) services. For Clients where a fixed fee has been determined, the annual fixed fee will be \$ \_\_\_\_\_. The fee is billed monthly, at the beginning of each calendar month. Fixed advisory fees will generally range from \$300 - \$5,000 per year.

Fees may be negotiable depending on the size and complexity of the Plan.

#### Financial Planning Services

Avaii may include financial planning services as part of the overall investment advisory fee or its may be offered separately. Project-based engagements may be offered at an hourly rate ranging from \$150 to \$300 per hour based on the experience of the Advisory Person rendering services and/or the complexity of the services provided. Fixed fee projects are based on the expected duration to complete the engagement deliverable[s] at the Advisor's hourly rate. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. The Advisor may also engage for ongoing planning services payable in advance of each month. An estimate for total hours and/or costs will be provided prior to engaging for these services.



## **B. Fee Billing**

### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the end of each Billing Period. The amount due is calculated by applying the fee rate to the total assets under management with Avaii. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Avaii directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee may be provided to Avaii.

### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### Financial Planning Services

Project-based financial planning fees are invoiced by the Advisor upon completion of the agreed upon deliverable[s]. Ongoing retainer engagements are billed monthly in advance.

## **C. Other Fees and Expenses**

All fees paid to Avaii for investment advisory or financial planning services are separate and distinct from any and all other fees and expenses charged by the Custodian[s], plan administrators, or any other expense associated with the Client's accounts. Investments in mutual funds and ETFs also have an internal expense ratio charged by the product. These fees are described in each mutual fund or ETF prospectus.

Custodians may charge securities transaction fees on purchases or sales of certain mutual funds, ETFs, individual equity securities, individual fixed income securities or other investment. They may also charge for certain services, e.g. wire transfers. See Brokerage Practices in Item 12.

## **D. Advance Payment of Fees and Termination**

### Investment Management Services

Avaii is compensated for its services in advance of the Billing Period in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will promptly refund any unearned, prepaid fees. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Avaii will assist the Client with the termination and transition as appropriate.

### Retirement Plan Advisory Services

Avaii is compensated for its services at the beginning of the month before advisory services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written



notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the month. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

Avaii may be partially compensated for its services in advance of the engagement. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor and any unearned, prepaid fees will be promptly refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Avaii does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons of Avaii may also be registered representatives of Private Client Services, LLC ("PCS"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of PCS, an Advisory Person may implement securities transactions under PCS and not through Avaii. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate from and in addition to Avaii's advisory fees. Please see Item 10.

Advisory Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on the Client's needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor.

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

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Avaii does not charge performance-based fees for its investment advisory services. The fees charged by Avaii are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Avaii does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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Avaii offers investment advisory services to individuals, families, trusts, estates, charitable organizations, businesses and retirement plans. Avaii generally does not impose a minimum size for establishing a relationship.

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

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### A. Methods of Analysis

Avaii may employ any of the following methods of analysis, tools and strategies in developing portfolios for its Clients.

*Fundamental Analysis* involves evaluating a security using real data such as company revenues, earnings, return on equity, and profit margins to determine underlying value and potential growth. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk.

*Cyclical Analysis* involves analyzing the cycles of the market. Cyclical analysis may involve inflation risk, market risk, and currency risk.

Behavioral Finance proposes psychology-based theories to explain stock market anomalies. It assumes the information structure and the characteristics of market participants systematically influence the investment decisions of individuals as well as the market outcomes.

*Modern Portfolio Theory* ("MPT") assumes investors are risk averse which means when given two assets with the same expected return the investor will choose the less risky one. An investor is only willing to take more risk if the expected return is greater. Therefore, MPT aims to construct a portfolio of investments that has the best possible expected return for the level of risk.

*Asset Allocation* is an investment strategy used to balance risk and return according to a client's investment objective, risk tolerance and investment horizon. It is used to manage portfolio volatility by investment in different asset classes.

*Diversification* is a risk management strategy used to reduce the volatility of a portfolio by investing in different asset classes, different market sectors, and/or different companies.

### B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Avaii will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Avaii or any of its Supervised Persons.**

Avaii values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching our firm name or our CRD# 298165.

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

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#### Use of Independent Managers

As noted in Item 4, the Advisor may select Independent Managers to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will collect the investment advisory fees and provide a portion of the fee to the Independent Manager.

#### Broker-Dealer Affiliation

Advisory Persons of Avaii may also be registered representatives of PCS. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person of Avaii. Neither Avaii nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by PCS, PCS may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information.

#### Insurance Agency Affiliations

Advisory Persons of Avaii may serve as insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with Avaii. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory

fees. This may cause a conflict of interest in recommending insurance products. Clients are under no obligation to implement any recommendations made the Advisor or its Advisory Persons.

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

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### **A. Code of Ethics**

Avaii has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Avaii (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Avaii and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Avaii’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (920) 214-1212.

### **B. Personal Trading with Material Interest**

Avaii allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Avaii does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Avaii does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Avaii allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Avaii requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While Avaii allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Avaii, or any Supervised Person of Avaii, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Avaii does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Avaii to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Avaii does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Avaii does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients. As its Advisory Persons are also registered representatives of PCS, Avaii and its Advisory Persons are limited in the Custodians in which they can recommend to Clients. Clients are not obligated to use the

Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker not recommended by Avaii. However, if the recommended Custodian is not utilized the Advisor may be limited in the services it can provide to the Client comparable to other Clients. Avaii may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or location of the Custodian's offices. Avaii will generally recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"). Fidelity is a FINRA-registered broker-dealer and member SIPC and will serve as the Client's "qualified custodian". Avaii maintains an institutional relationship with Fidelity whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **Avaii does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from Fidelity. Please see Item 14 below.**

**2. Brokerage Referrals** - Avaii does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Avaii will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s], unless separately instructed by the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Avaii will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Avaii will execute its transactions through the Custodian authorized by the Client. Avaii may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Avaii and periodically by the CCO. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Avaii if changes occur in the

Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Avaii**

Avaii does not receive commissions from product sponsors or broker-dealers, except as noted in Item 10 above. Avaii may refer Clients to various unaffiliated professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Avaii may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Avaii has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor has received financial support from Fidelity to assist the Advisor in the launch of its advisory firm. The following benefits are also received from Fidelity: reimbursement to Clients for transfer costs to the platform/custodian; financing services; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Use of Independent Managers

The Advisor may be indirectly compensated by an Independent Manager as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

### **B. Client Referrals from Solicitors**

Avaii does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Avaii to utilize that Custodian for the Client's security transactions. Avaii does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees or authorize transfers on the Client's behalf. If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.



Clients should review statements provided by the Custodian and compare to any reports provided by Avaii to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

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Avaii generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Avaii. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Avaii will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Avaii does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. If the Client elects to direct proxies to the Advisor, such election does not result in the authority for the Advisor to vote such proxies. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Avaii, nor its management, have any adverse financial situations that would reasonably impair the ability of Avaii to meet all obligations to its Clients. Neither Avaii, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Avaii is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Christian J. Doule, ChFC®, CLU®, CLTC®  
Wealth Management Advisor**

**Effective:   October 11, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Christian J. Doule (CRD# 5469878) in addition to the information contained in the Avaii Wealth Management, LLC (“Avaii” or the “Advisor”, CRD# 298165) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avaii Disclosure Brochure or this Brochure Supplement, please contact us at (920) 214-1212.

Additional information about Mr. Doule is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5469878.

## Item 2 – Educational Background and Business Experience

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Christian J. Doule, born in 1975, is dedicated to advising Clients of Avaii as its Managing Member and Wealth Management Advisor. Mr. Doule earned an Associates in Finance from Madison Area Technical College in 1999 and holds the following designations:

- Chartered Financial Consultant (ChFC®)
- Chartered Life Underwriter (CLU®)
- Certified in Long-Term Care (CLTC®)

Additional information regarding Mr. Doule's employment history is included below.

### Recent Employment History:

Managing Member and Wealth Management Advisor, Avaii Wealth Management, LLC	09/2018 to Present
Registered Representative, Private Client Services, LLC	09/2018 to Present
Wealth Management Advisor, Northwestern Mutual Investment Services, LLC	05/2008 to 09/2018

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### The Chartered Life Underwriter® ("CLU®")

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

### Program Learning Objectives:

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues

Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

### Certified Long-Term Care ("CLTC®")

The CLTC, Certified in Long-Term Care designation is a long-term care planning designation granted by the Corporation for Long-term Care Certification to individuals who satisfy educational, work experience and ethics requirements. Recipients of the CLTC have completed a rigorous multidisciplinary course and examination, that

focuses on long-term care. To maintain this designation, the CLTC must satisfy continuing education requirements and adhere to the CLTC Code of Professional Responsibility.

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Doule.*** Mr. Doule has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Doule.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Doule.***

However, we do encourage you to independently view the background of Mr. Doule on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5469878.

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### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Mr. Doule is also a registered representative of Private Client Services, LLC (“PCS”). PCS is a registered broker-dealer (CRD# 120222), member FINRA, SIPC. In Mr. Doule’s separate capacity as a registered representative, Mr. Doule will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Doule. Neither the Advisor nor Mr. Doule will earn any ongoing investment advisory fees in connection with any products or services implemented in Mr. Doule’s separate capacity as a registered representative.

#### Insurance Agency Affiliations

Mr. Doule is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Doule’s role with Avaii. As an insurance professional, Mr. Doule may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Doule is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Doule or the Advisor.

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### Item 5 – Additional Compensation

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Mr. Doule has additional business activities where compensation is received that are detailed in Item 4 above.

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### Item 6 – Supervision

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Mr. Doule serves as the Managing Member and a Wealth Management Advisor of Avaii and is supervised by Aaron Skurr, the Chief Compliance Officer. Mr. Skurr can be reached at (920) 214-1212.

Avaii has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Avaii. Further, Avaii is subject to regulatory oversight by various agencies. These agencies require registration by Avaii and its Supervised Persons. As a registered entity, Avaii is subject to examinations by regulators, which may be announced or unannounced. Avaii is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jeffrey J. Rainer, ChFC®, CLU®, CLTC®  
Wealth Management Advisor**

**Effective: October 11, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey J. Rainer (CRD# 3168972) in addition to the information contained in the Avaii Wealth Management, LLC (“Avaii” or the “Advisor”, CRD# 298165) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avaii Disclosure Brochure or this Brochure Supplement, please contact us at (920) 214-1212.

Additional information about Mr. Rainer is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3168972.

## Item 2 – Educational Background and Business Experience

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Jeffrey J. Rainer, born in 1970, is dedicated to advising Clients of Avaii as a Member and Wealth Management Advisor.

Mr. Rainer holds the following designations:

- Chartered Financial Consultant (ChFC®)
- Chartered Life Underwriter (CLU®)
- Certified in Long-Term Care (CLTC®)

Additional information regarding Mr. Rainer's employment history is included below.

### Recent Employment History:

Member and Wealth Management Advisor, Avaii Wealth Management, LLC	09/2018 to Present
Registered Representative, Private Client Services, LLC	09/2018 to 12/2018
Wealth Management Advisor, Northwestern Mutual Investment Services, LLC	03/2003 to 09/2018

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### The Chartered Life Underwriter ("CLU®")

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

### Program Learning Objectives:

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues

Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

### Certified Long-Term Care ("CLTC®")

The CLTC, Certified in Long-Term Care designation is a long-term care planning designation granted by the Corporation for Long-term Care Certification to individuals who satisfy educational, work experience and ethics

requirements. Recipients of the CLTC have completed a rigorous multidisciplinary course and examination, that focuses on long-term care. To maintain this designation, the CLTC must satisfy continuing education requirements and adhere to the CLTC Code of Professional Responsibility.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Rainer.*** Mr. Rainer has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rainer.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Rainer.***

However, we do encourage you to independently view the background of Mr. Rainer on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3168972.

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

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#### Insurance Agency Affiliations

Mr. Rainer is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Rainer's role with Avaii. As an insurance professional, Mr. Rainer may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Rainer is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Rainer or the Advisor.

### **Item 5 – Additional Compensation**

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Mr. Rainer has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Rainer serves a Member and Wealth Management Advisor of Avaii and is supervised by Aaron Skurr, the Chief Compliance Officer. Mr. Skurr can be reached at (920) 214-1212.

Avaii has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Avaii. Further, Avaii is subject to regulatory oversight by various agencies. These agencies require registration by Avaii and its Supervised Persons. As a registered entity, Avaii is subject to examinations by regulators, which may be announced or unannounced. Avaii is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Joel T. Blattner**  
**Director of Investments**

**Effective: October 11, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Joel T. Blattner (CRD# 5440787) in addition to the information contained in the Avaii Wealth Management, LLC (“Avaii” or the “Advisor”, CRD# 298165) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avaii Disclosure Brochure or this Brochure Supplement, please contact us at (920) 214-1212.

Additional information about Mr. Blattner is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5440787.



## Item 2 – Educational Background and Business Experience

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Joel T. Blattner, born in 1984, is dedicated to advising Clients of Avaii as a Member and the Director of Investments of the Advisor. Mr. Blattner also earned a Bachelor of Business Administration / Finance from University of Wisconsin-Oshkosh in 2006. Additional information regarding Mr. Blattner's employment history is included below.

### Employment History:

Member, Director of Investments, Avaii Wealth Management, LLC	09/2018 to Present
Registered Representative, Private Client Services, LLC	09/2018 to Present
Director of Investments, Northwestern Mutual Investment Services, LLC	04/2014 to 09/2018
Director of Brokerage Operations, Packerland Brokerage Services	04/2012 to 04/2014
Director of Network Office Supervision, Northwestern Mutual	06/2010 to 04/2012
Investment Review Principal, SII Investments	01/2007 to 05/2010

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Blattner.*** Mr. Blattner has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Blattner.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Blattner.***

However, we do encourage you to independently view the background of Mr. Blattner on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5440787.

### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Mr. Blattner is also a registered representative of Private Client Services, LLC (“PCS”). PCS is a registered broker-dealer (CRD# 120222), member FINRA, SIPC. In Mr. Blattner’s separate capacity as a registered representative, Mr. Blattner will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Blattner. Neither the Advisor nor Mr. Blattner will earn any ongoing investment advisory fees in connection with any products or services implemented in Mr. Blattner’s separate capacity as a registered representative.

#### Insurance Agency Affiliations

Mr. Blattner is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Blattner’s role with Avaii. As an insurance professional, Mr. Blattner may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Blattner is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Blattner or the Advisor.

### Item 5 – Additional Compensation

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Mr. Blattner has additional business activities where compensation is received that are detailed in Item 4 above.

### Item 6 – Supervision

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Mr. Blattner serves a Member and Director of Investments of Avaii, and is supervised by Aaron Skurr, the Chief Compliance Officer. Mr. Skurr can be reached at (920) 214-1212.

Avaii has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Avaii. Further, Avaii is subject to regulatory oversight by various agencies. These agencies require registration by Avaii and its Supervised Persons. As a registered entity, Avaii is subject to examinations by regulators, which may be announced or unannounced. Avaii is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Mark D. Truettner  
Wealth Advisor**

**Effective: October 11, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mark D. Truettner (CRD# 5851829) in addition to the information contained in the Avaii Wealth Management, LLC (“Avaii” or the “Advisor”, CRD# 298165) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avaii Disclosure Brochure or this Brochure Supplement, please contact us at (920) 214-1212.

Additional information about Mr. Truettner is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5851829.

## Item 2 – Educational Background and Business Experience

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Mark D. Truettner, born in 1969, is dedicated to advising Clients of Avaii as a Wealth Advisor. Mr. Truettner earned a B.S. in Finance from University of Wisconsin Oshkosh in 2009. Additional information regarding Mr. Truettner's employment history is included below.

### Employment History:

Wealth Advisor, Avaii Wealth Management, LLC	09/2018 to Present
Registered Representative, Private Client Services, LLC	09/2018 to 02/2019
Financial Advisor, Northwestern Mutual Investment Services, LLC	10/2009 to 09/2018

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Truettner.*** Mr. Truettner has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Truettner.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Truettner.***

However, we do encourage you to independently view the background of Mr. Truettner on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5851829.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Truettner is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Truettner's role with Avaii. As an insurance professional, Mr. Truettner may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Truettner is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Truettner or the Advisor.

## Item 5 – Additional Compensation

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Mr. Truettner has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Truettner serves as a Wealth Advisor with Avaii and is supervised by Aaron Skurr, the Chief Compliance Officer. Mr. Skurr can be reached at (920) 214-1212.

Avaii has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Avaii. Further, Avaii is subject to regulatory oversight by various agencies. These agencies require registration by Avaii and its Supervised Persons. As a registered entity, Avaii is subject to examinations by regulators, which may be announced or unannounced. Avaii is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective Date: March 8, 2019

### Our Commitment to You

Avaii, Partners, LLC ("Avaii" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Avaii (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Avaii does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Avaii shares Client information with Private Client Services, LLC ("PCS") due to the oversight PCS has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the PCS Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Avaii does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Avaii or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Avaii does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (920) 214-1212.