

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies

Form ADV Part 2A – Disclosure Brochure

Effective: April 09, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Bamboo Wealth 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 Bamboo Wealth to assist you in determining whether to retain the Advisor.

Additional information about Bamboo Wealth and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD #170093.

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Item 2 – Material Changes

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 the Advisory Persons of Bamboo Wealth. For convenience, the Advisor have combined these documents into a single disclose document.

Bamboo Wealth believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Bamboo Wealth encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to clients.

- The Advisor is affiliated through common ownership with Sovran Advisors, LLC, a registered investment advisor. Please see item 10 for additional information.
- The Advisor recommends that Clients establish their accounts at Charles Schwab & Co., Inc. Please see items 12 and 14 for additional information.
- The Advisor added additional risk of loss disclosures to Item 8. Please see Item 8 for additional information.
- The Advisor added additional disclosure to Item 10 "Insurance Agency Affiliations". Please see Item 10 for additional information.

Future Changes

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

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 170093. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
Item 5 – Fees and Compensation.....	6
Item 6 – Performance-Based Fees and Side-by-Side Management	10
Item 7 – Types of Clients.....	10
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	10
Item 9 – Disciplinary Information	14
Item 10 – Other Financial Industry Activities and Affiliations	14
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	16
Item 12 – Brokerage Practices.....	17
Item 13 – Review of Accounts	18
Item 14 – Client Referrals and Other Compensation.....	18
Item 15 – Custody	19
Item 16 – Investment Discretion.....	20
Item 17 – Voting Client Securities	20
Item 18 – Financial Information	20
Form ADV Part 2B – Brochure Supplements	22
Privacy Policy	28

Item 4 – Advisory Services

A. Firm Information

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). Bamboo Wealth is organized as a corporation under the laws of the State of California. Bamboo Wealth was founded in December 2013 and is owned and operated by Danielle L. Luster (President), Brentt A. Hoover (Chief Executive Officer & Chief Compliance Officer) and Jeremy S. Martinson (Chief Financial Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Bamboo Wealth.

B. Advisory Services Offered

Bamboo Wealth offers investment advisory services to individuals, high net worth individuals, businesses, trusts, estates, charitable organizations, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the 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. Bamboo Wealth’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Bamboo Wealth provides customized investment advisory solutions for its Clients. This is achieved through frequent personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. Bamboo Wealth works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an allocation. Bamboo Wealth will then construct a portfolio, consisting primarily of low-cost diversified exchange-traded funds (“ETFs”), including ETFs in the gold precious metals and commodity sectors, foreign and domestic equities, and mutual funds to achieve the Client’s investment goals. The Advisor may also utilize real estate funds, including REITs, as well as bonds to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Bamboo Wealth’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Bamboo Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. 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.

Bamboo Wealth evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Bamboo Wealth may, on occasion, redistributing investment allocations to diversify the portfolio. Bamboo Wealth may buy specific positions to increase sector or asset class weightings. The Advisor may employ cash positions as a possible hedge against market movement. Bamboo Wealth may sell positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Bamboo Wealth accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts (“IRAs”), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g.

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commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Financial Planning Services

Financial planning services are designed to provide highly customized financial planning advice for the Client that will address the Client's stated financial objectives and/or concerns. Bamboo Wealth Strategies will provide financial planning services to the Client, pursuant to a written financial planning agreement. The content and scope of the financial planning recommendations may include but will not be limited to: a net worth statement, a cash flow statement, analysis of the aforementioned, and a recommended course of action detailing the specific financial recommendations being made to help the Client achieve their stated financial goals and objectives. In addition, and/or in conjunction with the Client's stated financial goals and objectives, on an ongoing or fixed engagement basis, the following areas shall be addressed in the financial analysis and subsequent recommendations as applicable:

1. Financial Position (cash flow & debt structure management)
2. Income Tax Planning
3. Investment Planning
4. Employee Benefits Planning
5. Retirement Planning
6. Business Planning
7. Insurance Planning & Risk Management
8. Estate Planning

Bamboo Wealth is configured to provide for financial planning advice in two distinct methods as follows:

One Time Fixed Engagement – Development and delivery of customized financial advice tailored to the Client's unique financial objectives and circumstance. The financial advice will address the Client's specific and current financial objectives and/or concerns (not ongoing financial advice). Based on the need of the Client, a fixed engagement may also be narrow in scope (such as an engagement specifically focused on estate planning, business planning, or major purchase planning). In most circumstances, a personalized interactive financial planning website will be created and shared with the Client. This provides the Client with secure access to on demand financial reports that may include but are not limited to; cash flow, balance sheet, income statement, and retirement projections. The Client relationship in the fixed engagement financial planning capacity terminates once the recommendations addressing all the Clients specific financial objectives have been delivered to the Client and all questions and concerns regarding the recommendations have been addressed. Unless otherwise stated, the total timeframe for a fixed engagement shall not exceed 12 months.

Ongoing Financial Advice – This includes the development and delivery of customized financial advice as illustrated above in the One Time Fixed Engagement model, plus ongoing advice. Ongoing financial advice includes unlimited telephone and in person meetings to address any and all financial concerns of the Client. Also included are periodic meetings initiated by the Advisor to proactively address financial considerations and opportunities that may arise due to macroeconomic factors or potential changes in the Client's financial circumstance.

Bamboo Wealth may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. 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.

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Retirement Plan Advisory Services

Bamboo Wealth provides retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (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
- Investment Oversight Services (ERISA 3(21))
- Ongoing Investment Recommendation and Assistance

These services are provided by Bamboo Wealth serving in the capacity of 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 Bamboo Wealth’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging Bamboo Wealth 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 – Bamboo Wealth, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Bamboo Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Bamboo Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Bamboo Wealth will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

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

E. Assets Under Management

As of December 31, 2023, the Advisor manages \$151,901,509 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

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 quarterly in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Bamboo Wealth uses the average daily balance (“ADB”) in the Client’s account from the previous billing quarter to determine the value of assets under management for billing purposes. For account[s] where ADB (i.e., 529 plan) is not readily available, the value for billing purposes shall be the average of the beginning and ending account balances (“ABE”) from the previous quarter ((beginning balance + ending balance)/2). Investment advisory fees are typically deducted from accounts during the first fourteen days of each

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quarter. Either ADB or ABE may be referred to as the billable account balance. Lower fees for comparable services may be available from other sources.

Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$1,000,000	1.25%
\$1,000,001 to \$1,500,000	1.00%
\$1,500,001 to \$2,000,000	0.90%
\$2,000,001 to \$3,000,000	0.80%
Above \$3,000,000	0.70%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Fees may vary from the above fee schedule depending on the nature and complexity of each Client's circumstances, or with the inclusion of financial planning services. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Bamboo Wealth will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

Fees for certain fee-based annuities are billed quarterly, at the end of the quarter. Fees are calculated based on quarter-end valuations of the annuity as provided by the Custodian. Fees will be deducted from the Client accounts[s] by the Custodian. Clients provide written authorization permitting advisory fees to be deducted by the Custodian directly from their account[s] and paid out to the Advisor as part of the investment advisory agreement and separate account forms provided by the Custodian. The Custodian shall send a quarterly invoice indicating the amount of the fees to be deducted from the Client Account(s).

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses as described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

The cost for financial planning services and/or providing ongoing financial planning advice for one year's time is between \$1,500 and \$20,000. Fees may also be charged on an hourly basis at a rate ranging from \$250 to \$500 per hour. Fees are negotiable and are based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. Bamboo Wealth is configured to charge a fee for financial planning advice in the following distinct methods:

One Time Fixed Engagement – Clients may be charged on a fixed fee or hourly basis depending on the needs of the Client. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services. Unless otherwise stated, the total timeframe for services delivered on an hourly basis or fixed engagement fee shall not exceed 12 months.

Ongoing Financial Advice – Clients may be charged a one-time plan setup fee with a monthly or annual fee for ongoing advice depending on the needs of the Client.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged a fixed engagement fee billed quarterly either in advance or arrears, depending on the terms of the retirement plan advisory agreement. Fixed engagement fees range from \$1,500 to \$20,000. Fees may be negotiable depending on the size and complexity of the Plan.

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. Bamboo Wealth also offers Clients the ability to pay by credit card, debit card, check, or alternate advisory account. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to

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be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the billable account balance multiplied by the annual rate divided by 4. 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 Bamboo Wealth to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. Bamboo Wealth also offers Clients the ability to pay investment advisory fees via credit card, debit card or check. In such instances, the Advisor will invoice the Client directly.

Financial Planning Services

Bamboo Wealth collects its fixed and hourly financial planning fees, either 50% in advance or 100% in advance. The monthly fee for ongoing financial advice is charged in advance on or around the 1st of each month. Monthly fees in the first month of service are prorated from the inception date to the end of the first month. Annual fees will be charged on or around the anniversary of the initiation of financial planning services.

Typically, Bamboo Wealth will send all the client's invoices to AdvicePay (a secure payment processing application) and AdvicePay will provide client with invoices from Bamboo Wealth. Clients agree to make all payments through AdvicePay under the terms of client's separate AdvicePay Account. Payments may be automatically processed through AdvicePay via debit card, ACH, or credit card. Client acknowledges that Bamboo Wealth will not maintain control, copies, or custody of client's credit card or payment information at any point. Clients typically agree to set up and register an account with AdvicePay ("AdvicePay Account") so that clients can timely pay Bamboo Wealth invoices through AdvicePay's portal. The failure to create the AdvicePay Account, or client's termination of the AdvicePay account, shall constitute grounds for termination.

At times, in its sole discretion, Bamboo Wealth will allow clients the ability to pay for ongoing financial planning services via check, or an alternate advisory account. If paying by check for ongoing services, Bamboo Wealth will issue an invoice directly to the client, and invoices are due and payable upon receipt. If an advisory account is utilized for financial planning fees, Bamboo Wealth may send an invoice to the Custodian indicating the amount of the fees to be deducted from the client's account[s] at the beginning of the respective period. Clients will be provided with periodic statements from the Custodian reflecting deduction of the 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 ongoing financial planning fees to be deducted by Bamboo Wealth to be paid directly from their account[s] held by the Custodian as part of the financial planning agreement and any applicable separate account forms provided by the Custodian. Invoicing client advisory accounts for financial planning fees creates a risk to the client in that such deductions will result in lesser returns on their advisory accounts.

Retirement Plan Advisory Services

Retirement plan advisory 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.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Bamboo Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but may charge for mutual funds and other types of investments. The investment advisory fee charged by Bamboo Wealth is separate and distinct from these custody and execution fees.

In addition, all fees paid to Bamboo Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of

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Bamboo Wealth, but would not receive the services provided by Bamboo Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for the Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Bamboo Wealth to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Bamboo Wealth is compensated for its services in advance of the quarter in which investment management 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. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent. In the event that a Client's account has a change in the title only, the Advisor will not refund the billing for that quarter. However, the Advisor will not charge the new account for the remainder of the quarter.

Financial Planning Services

Bamboo Wealth is compensated for its services in advance either in whole or in part. For ongoing financial planning services, Bamboo Wealth requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also 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 actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Bamboo Wealth is compensated for its services either at the beginning or at the end of the quarter in which retirement plan 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 retirement plan advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid retirement plan advisory fees from the effective date of the termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Bamboo Wealth 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.

Some of Bamboo Wealth's Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by an Advisory Person are separate and in addition to Bamboo Wealth's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through an Advisory Person. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

Bamboo Wealth 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

Bamboo Wealth offers investment advisory services to individuals, high net worth individuals, businesses, trusts, estates, charitable organizations, and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Bamboo Wealth generally does not impose a minimum size for establishing a relationship.

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

A. Methods of Analysis

Bamboo Wealth employs fundamental analysis and modern portfolio theory methods in developing investment strategies for its Clients. Research and analysis from Bamboo Wealth is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental Analysis

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed.

Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps 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 the fundamental analysis may lose value and may have negative investment performance.

The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Modern Portfolio Theory

Modern portfolio theory is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

As noted above, Bamboo Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Bamboo Wealth will often hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Bamboo Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, asset class, or the economy.

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. Bamboo Wealth 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.

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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. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

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 generally 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 investment approach:

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Other Risk Considerations

Management Risk

Our Investment Management Services Platform involves developing and implementing an investment strategy for you, which inherently involves making decisions about the future behavior of, among other things, the securities markets as a whole and the market for individual securities. Because there is no available methodology for accurately predicting future events over time, there can be no guarantee of success in developing a profitable investment strategy for you or in implementing the strategy developed.

Market Risk

This is the risk that the value of securities owned by an investor may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.

Cybersecurity Risk

The Firm relies on the use and operation of different computer hardware, software, and online systems and to varying degrees by investment program. The following risks are inherent to all such programs and are enhanced for online systems: unauthorized access to or corruption, deletion, theft, or misuse of confidential data relating to the Firm and its clients; and compromises or failures of systems, networks, devices or applications used by the Firm or its vendors to support the Firm's operations.

Vendor Risk

The Firm relies on third-party vendors to support certain functions. By relying on a vendor, the Firm reduces its level of control over services rendered. If a vendor fails to perform its obligations in a timely manner or at satisfactory quality levels, the Firm will be unable to provide investment advice in a manner consistent with its disclosures to clients.

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Equity Securities

In general, prices of equity securities are more volatile than those of fixed income securities. The prices of equity securities will rise and fall in response to a number of different factors, including events that affect particular issuers as well as events that affect entire financial markets or industries.

Interest Rate Risk

This is the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.

Credit Risk

This is the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.

Concentrated Investment Strategies

Certain investment strategies may be concentrated in a specific sector or industry. If you invest in a portfolio or strategy that is made up of a concentrated position, sector or industry, your portfolio will be more likely to sharply increase or decrease in value with changes in the markets. Concentrated strategies are more volatile because the risk associated with each company represents a large percentage of your overall portfolio value.

Options

Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such a case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.

Exchange-Traded Funds (ETFs)

ETFs are typically investment companies that are legally classified as open-end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company. ETFs may be closed and liquidated at the discretion of the issuing company.

Emerging Market ETFs /Mutual Funds

Bamboo Wealth will at times utilize ETFs and/or mutual funds that invest in foreign and emerging markets. Emerging markets describe investing in developing countries. Emerging markets may undergo faster economic growth or decline than in developed countries. Depending on the stage of development emerging market securities can experience large periods of volatility due to economic, environmental, exports/import, and government changes. The governments in emerging markets can have unstable political scenes that can dramatically alter or impact asset prices during times of unrest or uncertainty.

Derivatives Risk

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Derivatives are types of investments where the investor does not own the underlying asset. There are many different types of derivative instruments, including, but not limited to, options, swaps, futures, and forward contracts. Derivatives have numerous uses as well as various risks associated with them, but they are generally considered an alternative way to participate in the market. Investors typically use derivatives for three reasons: to hedge a position, to increase leverage, or to speculate on an asset's movement. Some ETFs use derivatives, such as swaps, options, and futures, among others. Derivative instruments may be illiquid, difficult to value and leveraged so that small changes can produce disproportionate losses to a client. Over-the-counter derivatives, such as swaps, are also subject to counterparty risk, which is the risk that the other party in the transaction will not fulfill its contractual obligation. Losses from investments in derivatives can result from a lack of correlation between the value of those derivatives and the value of the underlying asset or index. In addition, there is a risk that the performance of the derivatives or other instruments used by ETFs to replicate the performance of a particular asset or asset class may not accurately track the performance of that asset or asset class. • *Leverage Risk – Leveraged and Inverse ETF Risk*

A leveraged ETF generally seeks to deliver multiples of the daily performance of the index or benchmark that it tracks.¹ An inverse ETF generally seeks to deliver the opposite of the daily performance of the index or benchmark that it tracks. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some ETFs are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse ETFs use a range of investment strategies, including swaps, futures contracts and other derivative instruments. Leveraged, inverse, and leveraged inverse ETFs are more volatile and riskier than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, the Firm will recommend leveraged and/or inversed ETFs, which may amplify gains and losses.

Risks Associated with Holding Leveraged and/or Inverse ETFs for an Extended Period of Time

Most leveraged ETFs are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged ETF calculates its net asset value ("NAV") to the time of the leveraged ETF's next NAV calculation. The return of the L-ETF for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged ETF will lose money when the level of the Index is flat, and it is possible that the leveraged ETF will lose money even if the level of the Index rises. Longer holding periods, higher index volatility and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged ETF's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged ETFs are riskier than similarly benchmarked ETFs that do not use leverage. Non-traditional ETFs are volatile and not suitable for all investors. Positions in nontraditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time.

Money Market Funds

A money market mutual fund, unlike a bank deposit, is not insured or guaranteed by the FDIC or any other governmental agency, and it is possible to lose money in a money market mutual fund. Money market mutual funds are covered by SIPC, which protects against custodial risk (not a decline in market value) when a brokerage firm fails by replacing missing securities and cash up to a limit of \$500,000, of which \$250,000 may be cash.

A money market mutual fund generally seeks to achieve a competitive rate of return (less fees and expense) consistent with the fund's investment objective(s), as described in its prospectus. As discussed in Item 14, returns

¹ For example: A 2X fund will have a multiplier of two times (2x) the Index. A single day movement in the Index approaching 50% at any point in the day could result in the total loss of a shareholder's investment if that movement is contrary to the investment objective of the leveraged ETF, even if the Index subsequently moves in an opposite direction, eliminating all or a portion of the earlier movement. This would be the case with any such single day movements in the Index, even if the Index maintains a level greater than zero at all times.

in the money market funds offered as the cash sweep vehicle vary over time and are generally higher than the returns paid on other sweep programs (including the FDIC-Insured Programs defined in Item 14) or could be higher than other money market mutual funds not offered as the cash sweep vehicle.

Structured Products

Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

Alternative Investments

Alternative Investments are subject to various risks such as limitations on liquidity, pricing mechanisms, and specific risk factors associated with the particular product, which for products associated with real estate, would include, but not be limited to, and property devaluation based on adverse economic and real estate market conditions. Alternative Investments may not be suitable for all investors. A prospectus that discloses all risks, fees and expenses, and risk factors associated with a particular Alternative Investment may be obtained from your Advisor. Read the applicable prospectus(es) or offering document(s) carefully before investing.

Investors considering an investment strategy utilizing Alternative Investments should understand that Alternative Investments are generally considered speculative in nature and involve a high degree of risk, particularly if concentrating investments in one or few alternative investments or within a particular industry. The risks associated with Alternative Investments are potentially greater and substantially different than those associated with traditional equity or fixed income investments.

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

There are no legal, regulatory or disciplinary events involving Bamboo Wealth or its management persons. Bamboo Wealth values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD #170093.

Item 10 – Other Financial Industry Activities and Affiliations

Spectrum Consulting Group (SCG)

Jeremy S. Martinson also owns and operates a separate business, Spectrum Consulting Group, which offers services to largely the same client base as Bamboo Wealth. This business provides bookkeeping, payroll processing, and other business-related services. Neither Mr. Martinson nor Spectrum Consulting Group have

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signatory authority for Client accounts. At times, representatives of Bamboo Wealth will recommend clients utilize the services of SCG for their business-related needs. Should clients of Bamboo Wealth choose to engage SCG, Bamboo Wealth representatives who are also employed by SCG will receive normal compensation for their respective role with SCG. Additionally, as Bamboo Wealth and SCG have common ownership, profits received by SCG will be shared by owners of Bamboo Wealth. In order to mitigate these conflicts, they are disclosed to clients through this Brochure and relevant Brochure Supplements. Further, clients are made aware – typically through the delivery of this Brochure, that they always have the right to decide whether or not to implement any recommended transactions by the Firm are under no obligation to utilize SCG for their accounting or other business-related needs and are free to select any firm of their choosing.

Real Estate Broker

Brentt Hoover is also a California real estate broker. From time-to-time, he will offer Clients advice, transact real property, or receive a referral fee from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable transactions can conflict with the fiduciary duties of a registered investment adviser. Bamboo Wealth always acts in the best interest of the Client; including in the sale of commissionable products to Clients. Clients of Bamboo Wealth are in no way required to implement any recommendation through Mr. Hoover in his capacity as a real estate broker.

Sovran Advisors, LLC

Jeremy Martinson also is an owner, control person, and President of Sovran Advisors, LLC (“Sovran”), a registered investment advisor. Sovran offers substantially similar advisory services to those offered by Bamboo Wealth. No client of Bamboo Wealth will be solicited by Mr. Martinson, to place assets with, or to be managed by, Sovran. In his separate capacity as Owner and President of Sovran, Mr. Martinson does not manage any of his own client accounts or relationships, with Mr. Martinson’s responsibilities with Sovran being largely managerial. At no time will Mr. Martinson or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Sovran on the same investment assets. Should clients of Bamboo Wealth choose to engage Sovran for advisory services, Mr. Martinson will share in profits received by Sovran due to his having an ownership interest in that company. In order to mitigate this conflict, it is disclosed to clients through Bamboo Wealth’s Disclosure Brochure and this Brochure Supplement. Further, neither Bamboo Wealth nor Sovran pay any referral fees or other direct compensation for the referral or receipt of clients between firms.

Insurance Agency Affiliations

Danielle L. Luster, Chelsea B. Mieczkowski and Brentt A. Hoover are also licensed insurance professionals, conducting the majority of their fixed insurance business through Bamboo Insurance Services Inc. (“Bamboo Insurance”). In their individual capacity as insurance agents of Bamboo Insurance, these persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. They also receive revenue directly from Bamboo Insurance. Commissions and revenue generated by insurance sales do not offset the Advisor’s investment advisory fees. Implementations of insurance recommendations are separate and apart from their role with Bamboo Wealth. This practice presents a conflict of interest as Danielle L. Luster, and Brentt A. Hoover have an incentive to recommend insurance products for the purpose of generating commission revenue for Bamboo Insurance rather than a recommendation solely based on Client’s needs. Clients are under no obligation to purchase insurance products through Danielle L. Luster, and Brentt A. Hoover of Bamboo Wealth in their separate capacity as insurance agents through Bamboo Insurance.

When insurance products are purchased through Bamboo Insurance, Mr. Martinson, Ms. Luster, and Mr. Hoover will receive profits and other related compensation in their role as owners. A conflict of interest exists because Mr. Martinson, Ms. Luster, and Mr. Hoover have an incentive to make recommendations based on the compensation received rather than on the Client’s needs. To mitigate this conflict, it is disclosed to clients through this Brochure and relevant Brochure Supplements. Clients always have the right to decide whether to implement any recommended transactions by the Firm. Should the client choose to do so, the client always has the right to choose the professional in which to do so. Bamboo Wealth clients should understand that lower fees and/or commissions for comparable services may be available from other sources.

Mr. Martinson is an owner of Sovran Insurance Services, Inc., d/b/a Sovran Financial and Insurance Services (“Sovran Insurance”), a Sovran Advisors LLC affiliated life, health, disability, and other fixed insurance company. When insurance products are purchased through Sovran Insurance, Mr. Martinson will receive profits and other

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related compensation in his role as an owner. A conflict of interest exists because Mr. Martinson has an incentive to make recommendations based on the compensation received rather than on the Client's needs. To mitigate this conflict, it is disclosed to clients through this Brochure and relevant Brochure Supplements. Clients always have the right to decide whether to implement any recommended transactions by the Firm. Should the client choose to do so, the client always has the right to choose the professional in which to do so. Bamboo Wealth clients should understand that lower fees and/or commissions for comparable services may be available from other sources.

Rollovers

When leaving an employer, Clients typically have four options regarding their existing retirement plan: (1) leave the assets in the former employer's plan, if permitted, (2) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (3) roll over the assets to an Individual Retirement Account ("IRA"), or (4) take a full withdrawal in cash, which would result in ordinary income tax and a penalty tax if the person is under age 59 1/2. At times, as part of its services, the Firm recommends that Clients roll over their 401(k) or other qualified plan assets to an IRA. This rollover recommendation presents a conflict of interest in that the Firm would receive compensation (or may increase current compensation) when investment advice is provided following the Client's decision to roll over plan assets. Clients who have assets in retirement accounts elsewhere would potentially pay a larger fee if rolled into an IRA or Roth IRA with Bamboo Wealth as the adviser. Bamboo Wealth will only recommend rollovers if it's in the best interest of the Client. Instances, where it may be in the best interest of the Client, are to simplify their account management (reduce the number of retirement accounts), have professional management of their account, gain access to additional investment options as compared to the current retirement plan, and/or pay lower administrative fees. Prior to making a decision, each Client should carefully review the information regarding rollover options and are under no obligation to rollover retirement plan assets to an account managed by Bamboo wealth.

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

A. Code of Ethics

Bamboo Wealth has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Bamboo Wealth ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to the Clients. Bamboo Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Bamboo Wealth'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 the Code, please contact the Advisor at (619) 289-9670 or via email at info@bamboowealth.com.

B. Personal Trading with Material Interest

Bamboo Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Bamboo Wealth 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. Bamboo Wealth does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Bamboo Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has 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 have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can 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 Bamboo Wealth requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

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D. Personal Trading at Same Time as Client

While Bamboo Wealth allows 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 afterward. **At no time will Bamboo Wealth, or any Supervised Person of Bamboo Wealth, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Bamboo Wealth 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 Bamboo Wealth to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Bamboo Wealth does not have the discretionary authority to negotiate transaction costs on behalf of Clients on a trade-by-trade basis.

Where Bamboo Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fees by the Advisor for using a custodian not recommended by Bamboo Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Bamboo Wealth 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 the location of the Custodian's offices. Bamboo Wealth will generally recommend that Clients establish accounts with Charles Schwab & Co., Inc. ("Schwab"). Schwab ("the "Custodians") serve as a "qualified custodian" for Client accounts. Please see Item 14 below.

Factors which the Advisor considers in recommending Schwab to Clients include their respective financial strength, reputation, execution, pricing, and research service. The commissions and/or transaction fees charged by Schwab may be higher or lower than those charged by other financial institutions. The Advisor maintains an institutional relationship with Schwab, whereby the Advisor receives certain Benefits. 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. **Bamboo Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Bamboo Wealth 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 Bamboo Wealth will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. 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]). Bamboo Wealth 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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Bamboo Wealth will execute its transactions through the Custodian as directed by the Client.

Bamboo Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian 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 Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Danielle L. Luster, Brentt A. Hoover and Jeremy S. Martinson, the Principal Officers of Bamboo Wealth. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. All financial planning engagements are reviewed and approved by Brentt A. Hoover, Chief Compliance Officer. Financial Planning advice provided to Clients is also reviewed by at least one Principal Officer prior to delivery.

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 Bamboo Wealth 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

A. Compensation Received by Bamboo Wealth

Participation in Institutional Advisor Platform (Schwab)

Bamboo Wealth has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Bamboo Wealth. As a registered investment advisor participating on the Schwab Advisor Services platform, Bamboo Wealth receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. 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.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its

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relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to Bamboo Wealth that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Bamboo Wealth believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Bamboo Wealth is incented to remain affiliated with Schwab and to recommend that Clients establish accounts with Schwab due to financial support received from Schwab. Through the relationship with Schwab, Bamboo Wealth will receive support payment for technology, marketing and compliance consulting related expenses based on a specific amount of Client assets to be custodied with Schwab. The receipt of any such compensation creates a financial incentive for Bamboo Wealth to recommend Schwab the Custodian for the assets in your account. This conflict is mitigated through disclosure and that Clients are not obligated to utilize Bamboo Wealth's recommended Custodian. Additionally, as mentioned above, the Client may directly or indirectly receive other benefits through the engagement with Schwab. Requisite encourages you to discuss any such conflicts of interest with us before making a decision to custody your assets at Schwab.

B. Client Referrals from Promoters

Bamboo Wealth does not compensate, either directly or indirectly, any affiliated or unaffiliated parties ("Promoters") for Client referrals.

Item 15 – Custody

Pursuant to the Investment Advisers Act of 1940, the Firm is deemed to have "constructive custody" of client funds because we have the authority and ability to debit our fees directly from the accounts of those clients receiving our services. Additionally, certain Clients have, and could in the future, sign a Standing Letter of Authorization ("SLOA") that gives Bamboo Wealth the authority to transfer funds to a third-party as directed by the Client in the SLOA. This is also deemed to give the Firm custody. Custody is defined as any legal or actual ability by the firm to withdraw client funds or securities. Firms with deemed custody must take the following steps:

1. Ensure clients' managed assets are maintained by a qualified custodian;
2. Have a reasonable belief, after due inquiry, that the qualified custodian will deliver an account statement directly to the client at least quarterly;
3. Confirm that account statements from the custodian contain all transactions that took place in the client's account during the period covered and reflect the deduction of advisory fees; and fees; and
4. Obtain a surprise audit by an independent accountant on the clients' accounts for which the advisory firm is deemed to have custody.

However, the rules governing the direct debit of Client fees and SLOAs exempt Bamboo Wealth from the surprise audit rules if certain conditions (in addition to steps 1 through 3 above) are met. Those conditions are as follows:

1. When debiting fees from client accounts, Bamboo Wealth must receive written authorization from clients permitting advisory fees to be deducted from the client's account.
2. In the case of SLOAs, Bamboo Wealth must: (i) confirm that the name and address of the third party is included in the SLOA, (ii) document that the third-party receiving the transfer is not related to the Firm, and (iii) ensure that certain requirements are being performed by the Custodian.

The Custodian that is selected by a Client maintains actual physical custody of Client assets. Client account statements from Custodians will be sent directly to each Client to the email or postal mailing address that is provided to the Custodian selected by the Client. Clients are encouraged to compare information provided in reports or statements received by Bamboo Wealth with the account statements received from their Custodian for accuracy. In addition, Clients should understand that it is their responsibility, not the Custodian's, to ensure that the fee calculation is correct.

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If Client funds or securities are inadvertently received by the Firm, they will be returned to the sender immediately, or as soon as practical.

Bamboo Wealth encourages our clients to raise any questions with us about the custody, safety or security of their assets. The Custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

Item 16 – Investment Discretion

Bamboo Wealth typically 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 Bamboo Wealth. 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 Bamboo Wealth will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Bamboo Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. 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

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

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement

for

Jeremy Scot Martinson, CFP®
Chief Financial Officer

Effective: April 09, 2024

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Jeremy S. Martinson, CFP® (CRD# 4587392) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) (CRD # 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 246-1172 or by email at info@bamboowealth.com.

Additional information about Mr. Martinson is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4587392.

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies
3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108
Phone: (619) 289-9670
<http://www.bamboowealthstrategies.com>

Item 2 – Educational Background and Business Experience

Jeremy S. Martinson, CFP®, born in 1977, is dedicated to advising Clients of Bamboo Wealth as Chief Financial Officer. Mr. Martinson earned a Bachelor's of Science in Business Administration (Finance) from San Diego State University in 2000 and earned a Master of Science Business Administration (Finance) from San Diego State University in 2005. Additional information regarding Mr. Martinson's employment history is included below.

Employment History:

Chief Financial Officer, Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies	12/2013 to Present
CEO, Spectrum Consulting Group, Inc.	03/2003 to Present
CFO & COO, and Secretary, SummaCor Inc.	06/2019 to Present
President, Sovran Advisors, LLC	12/2023 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	08/2014 to 04/2020

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.

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Phone: (619) 289-9670

<http://www.bamboowealthstrategies.com>

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Martinson. Mr. Martinson 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. Martinson.

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. Martinson.

However, the Advisor encourages Clients to independently view the background of Mr. Martinson on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or by his individual CRD# 4587392.

Item 4 – Other Business Activities

Firm	Type of Business	Position
Spectrum Consulting Group	Business Planning Services	Owner, Chief Financial Officer
SummaCor Inc.	Biotechnology Products/Services	Chief Financial Officer, Chief Operating Officer and Secretary
Spectrum Capital Investments LLC	Residential Real Estate Entity	Member
Sovran Advisors, LLC	Registered Investment Advisor	Owner, President, & Investment Advisor Representative
Sovran Insurance Services, Inc, DBA Sovran Investment & Insurance Services	Insurance Agency	Owner
Bamboo Insurance Services, Inc	Insurance Agency	Owner
Lucia Health Guidelines, LLC	Medical AI Solutions	Chief Financial Officer, Chief Operating Officer
La Mesa-Spring Valley School District Personnel Commission	Non-Profit Organization	Commissioner

Outside of his activities at Bamboo Wealth, Mr. Martinson – the Firm's CFO, is an owner and control person, and investment adviser representative of Sovran Advisors, LLC - an advisory firm registered with the Securities and

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Exchange Commission. Should clients of Bamboo Wealth choose to engage Sovran for advisory services, Mr. Martinson will share in profits received by Sovran due to his having an ownership interest in that company. In order to mitigate this conflict, it is disclosed to clients through Bamboo Wealth's Disclosure Brochure and this Brochure Supplements. Further, neither Sovran nor Bamboo wealth pay any referral fees or other direct compensation for the referral or receipt of clients between firms.

Additionally, Mr. Martinson owns and operates Spectrum Consulting Group ("SCG"), a bookkeeping, payroll processing, and other business-related services affiliated with Bamboo Wealth due to common ownership. Spectrum Consulting Group offers services to largely the same client base as Bamboo Wealth, and neither Mr. Martinson nor Spectrum Consulting Group have signatory authority for client accounts. At times, representatives of Bamboo Wealth will recommend clients utilize the services of SCG for their business-related needs. Should clients of Bamboo Wealth choose to engage SCG, Bamboo representatives who are also employed by SCG will receive normal compensation for their respective role with SCG. Additionally, as is an owner of SCG, he receives profits from SCG. In order to mitigate these conflicts, they are disclosed to clients through this Brochure and relevant Brochure Supplements. Further, clients are made aware – typically through the delivery of this Brochure, that they always have the right to decide whether or not to implement any recommended transactions by the Firm are under no obligation to utilize SCG for their accounting or other business-related needs and are free to select any firm of their choosing.

As the owner of Bamboo Insurance & Sovran Insurance, Mr. Martinson is entitled to receive profits and other forms of compensation. There are times when Advisors of Bamboo Wealth will recommend the purchase of certain insurance products to Bamboo Wealth clients that may be sold through Bamboo Insurance or Sovran Insurance. While Mr. Martinson doesn't include direct commission for the sale of insurance products, he is enriched by way of owner of these agencies, which therefore creates a conflict of interest. Bamboo Wealth has adopted certain procedures designed to mitigate the effects of these conflicts. Additionally, the conflicts presented by these practices are disclosed to clients through the Firm's Brochure, Brochure Supplements, the Client Agreement and/or verbally prior to or at the time of entering into an agreement with Bamboo Wealth. Clients always have the right to decide whether to implement any recommended transactions by Advisor.

Mr. Martinson also serves on the board of directors of several non-profit organizations. These include acting as Secretary for the John P. Martin Foundation, CEO of the La Mesa Community Kids Foundation, and Chairman of the Strong Foundation for La Mesa Spring Valley Schools.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Jeremy Martinson serves as Chief Financial Officer of Bamboo Wealth and is supervised by Mr. Hoover in his capacity as Chief Compliance Officer. Mr. Hoover can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth 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.

BAMBOO WEALTH STRATEGIES
STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement
for

Danielle L. Luster, CFP®
President

Effective: April 09, 2024

This Form ADV2B ("Brochure Supplement") provides information about the background and qualifications of Danielle L. Luster, CFP® (CRD# 1946873) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies ("Bamboo Wealth" or the "Advisor") (CRD# 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Additional information about Ms. Luster is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her individual CRD# 1946873.

Item 2 – Educational Background and Business Experience

Danielle L. Luster, CFP® born in 1967, is dedicated to advising Clients of Bamboo Wealth as the President. Ms. Luster earned a Bachelor of Arts, Urban Studies and Planning from the University of California, San Diego in 1991. Additional information regarding Ms. Luster's employment history is included below.

Employment History:

President, Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies	09/2014 to Present
Financial Services Representative & Investment Advisor Representative, MetLife Securities, Inc.	10/2009 to 08/2014
Registered Representative, Allstate Financial Services	04/2004 to 10/2009

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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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.

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Phone: (619) 289-9670

<http://www.bamboowealthstrategies.com>

Item 3 – Disciplinary Information

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

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 Ms. Luster.

However, the Advisor encourages Clients to independently view the background of Ms. Luster on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for her full name or her individual CRD# 1946873.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Luster is also a licensed insurance professional, conducting the majority of her fixed insurance business through Bamboo Insurance Services Inc. Implementations of insurance recommendations are separate and apart from Ms. Luster's role with Bamboo Wealth. As an insurance professional, Ms. Luster will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Luster also receives compensation directly from Bamboo Insurance. Ms. Luster is not required to offer the products of any particular insurance company. Commissions and other revenue generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies or recommending the implementation of insurance products through Bamboo Insurance. Clients are under no obligation to implement any recommendations made by Ms. Luster or the Advisor. Client are also under no obligation to implement any recommendation through Bamboo Insurance.

Item 5 – Additional Compensation

Ms. Luster has additional business activities where compensation is received that are detailed above Item 4.

Item 6 – Supervision

Ms. Luster serves as the President of Bamboo Wealth and is supervised by Mr. Hoover in his capacity as Chief Compliance Officer. Mr. Hoover can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth 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.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement

for

Brentt A. Hoover, CFP®, ChFC®, CLU®, CASL®, RICP®
Chief Executive Officer, Chief Compliance Officer

Effective: April 09, 2024

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Brentt A. Hoover, CFP®, ChFC®, CLU®, CASL®, RICP® (CRD# 4740664) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) (CRD # 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Additional information about Mr. Hoover is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4740664.

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Item 2 – Educational Background and Business Experience

Brentt A. Hoover, CFP®, ChFC®, CLU®, CASL®, RICP®, born in 1974, is dedicated to advising Clients of Bamboo Wealth as Chief Executive Officer and Chief Compliance Officer. Mr. Hoover earned an Associate General Education from San Diego Mesa College in 2000, and a Bachelor of Science in Business Administration (Financial Services) from the San Diego State University in 2002. Mr. Hoover also earned a Certificate in Personal Financial Planning from San Diego University in 2002. Additional information regarding Mr. Hoover's employment history is included below.

Employment History:

Chief Executive Officer, Chief Compliance Officer Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies	09/2014 to Present
Financial Services Representative & Investment Advisor Representative, MetLife Securities, Inc.	03/2004 to 08/2014
United States Marine Corps	08/1993 to 08/1997

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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.

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About the 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
- Demonstrate mastery of the core financial planning knowledge required of a CERTIFIED FINANCIAL PLANNER by passing the CFP® certification exam
- 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.

About 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

CASL® – Chartered Advisor for Senior Living®

MINIMUM REQUIREMENT:

- Candidates must pass an examination for the following five required courses:
 - o 328: Investments
 - o 330: Fundamentals of Estate Planning
 - o 350: Understanding the Older Client
 - o 351: Health and Long-Term Care Financing
 - o 352: Financial Decisions for Retirement
- As a general rule, candidates should plan to spend 50-70 hours studying for each course. The program can be completed as quickly as a candidate desires, but most students complete their designation requirements within 15-24 months.
- Each exam is a two-hour, 100 questions, and computer-administered exam.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required; an undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.
- Each designee must complete 15 hours of continuing education every two years, with the additional condition that at least 10 of these hours should be in course work directly related to the course work required to obtain this designation.

The CASL® credential provides advisors with in-depth training on issues impacting seniors and those

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planning for retirement. The designation incorporates five required, college-level courses that represent an average total study time of more than 250 hours. Topics include investments, estate planning, health and long-term care financing, and financial decisions for retirement. CASL® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 87-year heritage and the top level of academic accreditation.

RICP® – Retirement Income Certified Professional®

The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning, maximizing Social Security and other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 85-year heritage and the highest form of academic accreditation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hoover. Mr. Hoover 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. Hoover.

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. Hoover.

However, the Advisor encourages Clients to independently view the background of Mr. Hoover on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or his individual CRD# 4740664.

Item 4 – Other Business Activities

Other Affiliations

Mr. Hoover is also a California real estate broker. From time-to-time, he will offer clients advice, transact real property, or receive a referral fee from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable transactions can conflict with the fiduciary duties of a registered investment adviser. Bamboo Wealth always acts in the best interest of the Client; including in the sale of commissionable products to Clients. Clients of Bamboo Wealth are in no way required to implement any recommendation through Mr. Hoover in his capacity as a real estate broker.

Mr. Hoover owns a rental real estate property where he collects rent and pays expenses associated with the property.

Hampden Township Volunteer Fire Company

Mr. Hoover acts as the treasurer of the Hampden Township Volunteer Fire Company. Mr. Hoover maintains financial records, and receives all monies from the Financial Secretary in his role as treasurer. Mr. Hoover spends approximately 1.5% of his time a month in his role as treasurer.

Insurance Agency Affiliations

Mr. Hoover is also a licensed insurance professional, conducting the majority of his fixed insurance business through Bamboo Insurance Services Inc. Implementations of insurance recommendations are separate and apart from Mr. Hoover's role with Bamboo Wealth. As an insurance professional, Mr. Hoover will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hoover also receives compensation directly from Bamboo Insurance. Mr. Hoover is not required to offer the

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products of any particular insurance company. Commissions and other revenue generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies or recommending the implementation of insurance products through Bamboo Insurance. Clients are under no obligation to implement any recommendations made by Mr. Hoover or the Advisor. Client are also under no obligation to implement any recommendation through Bamboo Insurance.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Hoover serves as a Chief Executive Officer and Chief Compliance Officer of Bamboo Wealth and can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth 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.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement

for

Chelsea B. Mieczkowski, CFP®, EA®
Director of Financial & Tax Planning

Effective: April 09, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Chelsea B. Mieczkowski, CFP®, EA® (CRD# 7551242) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. (“Bamboo Wealth” or the “Advisor”, CRD# 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (619) 289-9670.

Additional information about Ms. Mieczkowski is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 7551242.

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies

3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108

Phone: (619) 289-9670

<http://www.bamboowealthstrategies.com>

Item 2 – Educational Background and Business Experience

Chelsea B. Mieczkowski CFP®, EA®, born in 1990, is dedicated to advising Clients of Bamboo Wealth as the Director of Financial & Tax Planning. Ms. Mieczkowski earned an MSBA with a Concentration in Financial & Tax Planning from San Diego State University in 2019. Ms. Mieczkowski also earned a Bachelor of Science, Foods & Nutrition from San Diego State University in 2012. Additional information regarding Ms. Mieczkowski's employment history is included below.

Employment History:

Director of Financial & Tax Planning, Spectrum Planning & Advisory Services Inc.	05/2022 to Present
Director of Financial Planning, Dyer Wealth Management	06/2017 to 05/2022
Accounting, San Diego Refrigerated Services	07/2014 to 04/2016
Special Projects, Accounting, San Diego Port Tenants Association	03/2014 to Present
Nutritional Marketing, Urban Remedy Pty Ltd	01/2013 to 01/2014

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.

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Enrolled Agent™ (“EA®”)

An Enrolled Agent™ (EA®) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels—examination, collection, and appeals—of the Internal Revenue Service. In addition to taxpayer representation, Enrolled Agents™ often provide tax consultation services and prepare a wide range of federal and state tax returns.

Item 3 – Disciplinary Information

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

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 Ms. Mieczkowski.***

However, we do encourage you to independently view the background of Ms. Mieczkowski on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 7551242.

Item 4 – Other Business Activities

San Diego Port Tenants Association

Ms. Mieczkowski is also a part time employee of the San Diego Port Tenants Association (“SDPTA”) where Ms. Mieczkowski performs bookkeeping responsibilities as well as providing special event planning assistance. Ms. Mieczkowski spends approximately 20 hours of her time per month in her role with the SDPTA, all of which are outside of normal business hours.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Ms. Mieczkowski serves as the Director of Financial & Tax Planning of Bamboo Wealth and is supervised by Brentt Hoover, the Chief Compliance Officer. Mr. Hoover can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth 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.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Spectrum Planning & Advisory Services Inc.
3131 Camino Del Rio North, Suite 1000, San Diego, California, 92108
(619) 289-9670 info@bamboowealth.com

PRIVACY POLICY

Effective: April 09, 2024

Our Commitment to You

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies ("Bamboo Wealth" 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. Bamboo Wealth (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.

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

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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?
Servicing our Clients We may share non-public personal information with affiliated or non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, insurance agencies, other financial institutions) as necessary for us and our affiliates 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.	Yes	No
Marketing Purposes Bamboo Wealth does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. We will not share information for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s], such as power of attorney or trustee.	Yes	Yes
Information About Former Clients Bamboo Wealth 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

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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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 the Advisor at (619) 289-9670.