

**MINNEAPOLIS**

5500 Wayzata Boulevard
Suite 290
Minneapolis, MN 55416

SARASOTA

1717 Second Street
Suite C
Sarasota, FL 34236

Phone: 612.455.6900

Web: whiteoakswealth.com

ITEM 1

This brochure provides information about the qualifications and business practices of White Oaks Wealth Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at 612-455-6900. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about White Oaks Wealth Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for White Oaks Wealth Advisors, Inc. is 173522.

White Oaks Wealth Advisors, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Effective February 2024

ITEM 2

Material changes from your last ADV Part 2A update:

- (1) *Managed Assets as of 12/31/2023*
- (2) *Custody Assets as of 12/31/2023*
- (3) *Item 12 Disclosed trade aggregation*

ITEM 3
Table of Contents

1. Material Changes 2

2. Advisory Business 4

3. Fees and Compensation 6

4. Performance-Based Fees and Side-by-Side Management..... 7

5. Types of Clients 7

6. Methods of Analysis, Investment Strategies and Risk of Loss..... 7

7. Disciplinary Information 8

8. Other Financial Industry Activities and Affiliations 8

9. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... 8

10. Brokerage Practices 9

11. Review of Accounts 10

12. Client Referrals and Other Compensation 10

13. Custody 10

14. Investment Discretion..... 11

15. Voting Client Securities..... 11

16. Financial Information 11

ITEM 4

White Oaks Wealth Advisors, Inc. (“White Oaks”) is an investment adviser registered with the United States Securities and Exchange Commission. Sharon Alison Bloodworth is 100% shareholder, CEO and Chief Compliance Officer of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. White Oaks provides Family Office Services, Investment Management, Wealth Management and Trust Services. Clients are free to impose investment restrictions on their accounts other than in our proprietary funds. All of White Oaks clients have given the firm discretionary authority to make investment decisions in their accounts following a proprietary model created by White Oaks designed to meet a client’s desire for return and appetite for risk. As of December 31, 2023, the firm managed assets on a discretionary basis in the amount of \$490,918,360 with 228 clients. White Oaks also managed custody assets as of December 31, 2023, of \$189,840,697. These assets are included in our assets under management. White Oaks no longer accepts nondiscretionary relationships for investment management relationships.

White Oaks provides the following Wealth Management services for its clients:

(4) White Oaks via its Family Office business unit provides services including but not limited to Investment Tracking and Performance Reporting, Bill Paying, Household Management, Payroll Processing, Estate Planning Strategies, Tax Planning and Recordkeeping, Intra-Family Communication and Meetings, Developing and Managing Philanthropic Programs and Processes and many other items that the family may need on a financial basis. These services are contracted individually and the fees are known in advance of the engagement. Portfolio Management as described below is not expressly included in these services and is contracted for separately. Fees for these services vary and are based on the expected work to be done and are highly customized. All fees are disclosed and agreed to in advance of the engagement.

(5) White Oaks uses White Oaks Investment Management, Inc. to provide investment advice for our clients. The ownership structure of White Oaks Investment Management, Inc. is the same as White Oaks Wealth Advisors, Inc. Sharon Alison Bloodworth is 100% shareholder, CEO and Chief Compliance Officer of the firm. There is a formal agreement between the two

companies for services for which White Oaks receives 40 basis points from White Oaks Investment Management, Inc. on all private fund income for servicing all clients and White Oaks Investment Management receives 40% of billed fees from White Oaks for investment management services. Both companies are incorporated in Delaware. White Oaks is located in Minneapolis, Minnesota, and White Oaks Investment Management is located in Sarasota, Florida. Both firms take on clients from around the entire United States. White Oaks does the financial planning, family office services, operation work, client service and management of all core fund accounts. White Oaks Investment Management, Inc. advises the White Oaks private fund accounts and provides investment recommendations, research and trading to White Oaks for the core fund accounts. White Oaks provides Portfolio Management services to individuals (other than high net worth), high net worth individuals, pension and profit sharing plans and charitable organizations on a discretionary basis using two models. These models are intended to honor and respect varying client’s needs and preferences. These models include the White Oaks Core Funds and the White Oaks Private Funds. For each approach, White Oaks reviews with each client their risk tolerance and asset allocation based on their expectations for return, appetite for risk, income needs and prejudices for and against certain types of investments. From this, a model is chosen and managed on an ongoing basis. White Oaks makes use of separately managed accounts and mutual, index and exchange-traded funds for its clients in addition to individual securities. Full disclosure of the additional levels of fees for managers and custody is provided to the client. White Oaks deducts the fees for this service from the account when possible. In conjunction with this arrangement, (1) the client provides written authorization permitting the deduction of these fees to the trustee/custodian; and (2) the trustee/custodian agrees to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to White Oaks. No fee is ever paid more than six (6) months in advance. For our Private Fund Accounts, the fees are deducted directly from the funds and are reflected on the Schedule K-1 at the end of the tax year and/or in the annual audit report. White Oaks does not share or participate in transaction fees charged by the trustee/custodian. Clients are under no obligation to accept or follow the recommendations made by White Oaks or to effect transactions through White Oaks or firms with a connection to White Oaks. Clients may be able to purchase recommended funds or separate accounts outside of our firm without White Oaks fees. Since White Oaks provides advice on investment company securities (i.e. mutual funds), the

client should be aware that, in addition to the fees paid to White Oaks, there are also fees that the investment company charges for its own advisory fees and expenses.

(6) White Oaks also provides comprehensive financial plans for a project fee. These fees are payable at the time the plan is delivered by White Oaks based on the information provided by the client on their goals and objectives. Clients will be asked to rate and rank their goals and objectives including, but not necessarily limited to, retirement, education funding, estate and income tax reduction, wealth transfer, stock option exercises, portfolio design, cash flow and budgeting and other topics relevant to the client's financial situation. A client's goals and prejudices for and against certain concepts and/or investment vehicles will be evaluated and considered when developing strategies to meet or improve their financial status. In developing recommended strategies, White Oaks will review the client's needs and opportunities with regard to cash flow management, retirement and/or financial security, risk management and insurance needs, special funding needs, estate and wealth transfer, income and estate tax and investment policy. White Oaks may also recommend specific investment vehicles including stocks, bonds, separately managed accounts, mutual funds, hedge funds, commodities, structured notes, futures, real estate or tax deferred or tax-exempt vehicles. White Oaks may also recommend certain types of insurance to be implemented as part of a plan; however, we do not sell or receive commissions from the sale of insurance or investment products. While a comprehensive financial plan is based on future expectations, each client is

strongly urged to have a plan reviewed annually in order to adapt to new and changing circumstances.

(7) White Oaks will also provide other miscellaneous services to clients on an hourly time and expense basis including, but not limited to, financial planning, family meetings, cost basis research, bill paying, outside investment research and other miscellaneous services a client may request.

White Oaks caters to ultra-high net worth family office clients as well as high net worth individuals seeking investment management and financial planning services. Fees for our services are determined carefully so that they are tailored to our client's specific needs and are competitive in the marketplace. Our firm investment management portfolio minimum is \$2,000,000 and can be waived at White Oaks discretion.

Our firm's design recognizes that clients should be able to pick and choose the services they want. We offer a la carte pricing on all services with discounts offered for using multiple services.

For non-investment services, we offer hourly, project fee or retainer relationships depending on the client's needs and preferences. Family office services are usually offered on an annual retainer basis. All fees are disclosed in advance. Fees for financial plans are billed on project completion. Investment management fees are billed in arrears. Core Fund fees are withdrawn from the investment account on a quarterly basis. Private Fund fees are deducted from the fund on a monthly basis.

ITEM 5

Service	Cost
Investment Management Fees Private Funds Our fully-diversified, proprietary portfolios available to accredited investors.	0.90% annual fee for the White Oaks Aggressive Growth Fund, White Oaks Alternative Strategies Fund, White Oaks Moderate Growth Fund and White Oaks Low Volatility Strategy Fund 0.75% annual fee and 10% incentive fee for the White Oaks Flexible Strategies Fund See offering memorandums for additional details.
Core Funds Our fully-diversified mutual, index and exchange traded fund portfolios for accredited or non-accredited investors.	1.00% annual fee. Negotiable above \$10,000,000 under management. White Oaks may, at its sole discretion, charge a lesser fee based upon certain criteria (including, but not limited to, historical relationship, familial relationship to an existing client, type of assets, anticipated future deposits, account composition, etc). See advisory agreement for additional details.
External Accounts Our solution to manage your active retirement accounts, such as 401Ks, 403Bs, etc.	1.25% annual fee. White Oaks may, at its sole discretion, charge a lesser fee based upon certain criteria (including, but not limited to, historical relationship, familial relationship to an existing client, type of assets, anticipated future deposits, account composition, etc). See advisory agreement for additional details.
Financial Planning included with Ongoing Investment Management	Financial planning is included with our investment management services for those clients with at least \$2,000,000 under White Oaks management. White Oaks may, at its sole discretion, offer financial planning to clients with less than this based upon certain criteria (including, but not limited to, historical relationship, familial relationship to an existing client, type of assets, anticipated future deposits, account composition, etc).
Initial Financial Planning Project Subject to a \$5,000 minimum, with an estimate based on individual circumstances and complexity, quoted in advance.	Project fee or hourly \$350/hr. Partner \$250/hr. Director \$150/hr. Manager

Wealth Management

Subject to a \$10,000 minimum fee

Retainer for services such as maintenance of financial plan and wealth strategy, but not including investment management.

Family Office Services

See Item 4(1) on page 4

Retainers quoted in advance, depending on complexity and desired level of service. Subject to \$25,000 annual minimum fee. White Oaks may, at its sole discretion, charge a lesser fee based upon certain criteria (including, but not limited to, historical relationship, familial relationship to an existing client, type of assets, anticipated future deposits, account composition, etc).

ITEM 6

White Oaks does not charge performance fees.

Morgan, Merrill Lynch, Goldman Sachs, RBC and many others.

ITEM 7

Individuals (other than high net worth), high net worth individuals, pension and profit sharing plans and charitable organizations.

White Oaks clearly recognizes the intent of these large firms is to serve as an inducement to use their products and services and consequently places much more emphasis on our paid for research and independent thinking. Of course, by using these resources, good ideas do in fact come to the forefront, and we feel it is critical to our overall process.

ITEM 8

White Oaks uses White Oaks Investment Management, Inc. to provide a proprietary strategic core and satellite asset allocation approach in designing client portfolios. We believe in diversification and risk-adjusted stock, asset class and/or sector selection. We seek out undervalued asset classes, overlooked sectors or trends and high probability strategies to enable us to accomplish our goal of outperforming our benchmarks on a net of fees basis. White Oaks relies on historical data such as mean rate of return, standard deviation, alpha, up-capture, down-capture and covariance to help understand how an investment strategy has performed and is likely to perform over long periods of time. White Oaks invests significantly in independent third-party research on economic and investment macro conditions and trends. Additionally, White Oaks makes use of major firm research made available to us from firms like JP

White Oaks investment philosophy is to focus on long-term opportunities. Investment tools such as margin, option writing and/or structured products may be used in a strategy if appropriate. The main focus of the White Oaks investment process is to assess relative valuations in the market place, develop strategic tactics to capture value and implement/monitor the process.

White Oaks can assist clients with the implementation of a strategy under two broad models as follows:

White Oaks Core Funds. Not all hold the view that active management adds no value to the investing process. In selecting active managers, White Oaks brings a proprietary screening and selection process that seeks managers who have demonstrated the ability to outperform their peers consistently. These commonly available funds do carry higher costs and have a higher burden to prove their place in a strategy. For that reason, passive mutual, index and exchange traded funds are also available and considered for selection.

White Oaks Private Funds. While there are a multitude of retail choices for investing, some of the better opportunities are reserved for larger purchasers. Wealthy families have often pooled their resources to meet the requirements of high minimums to gain access to exclusive opportunities and increased negotiating power to lower costs.

Please refer to your mutual, index or exchange traded fund prospectus or Private Fund offering memorandums for more information on investments and risks.

All investing strategies involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security.

There are many different types of risk when investing. These include, but are not limited to, market risk, strategy risk, defensive risk, company size risk, turnover risk, limited markets risk, concentration risk, interest rate risk, legal or legislative risk, inflation risk and risks with the securities themselves. Two great resources in understanding risk are:

<https://www.finra.org/investors/investing/investing-basics/risk> and <https://www.investor.gov/introduction-investing/investing-basics/what-risk>.

ITEM 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of White Oaks or the integrity of our management. We have no information applicable to this Item.

ITEM 10

In its effort to add additional value to the investment process, White Oaks has adopted a pooled approach in its professional dealings with qualified advisory clients that have a minimum of \$2,200,000 of investible assets. The \$2,200,000 (\$5,000,000 for non-personal entities) asset level (not including main residence) is one that the SEC defines as a “qualified client”. Additional structures have been created for those with \$5,000,000 (\$25,000,000 for non-personal entities) of investible assets known in SEC parlance as a Super-Accredited Investor. To provide for preferred tax status and client protections, these structures are formed as Limited Liability Corporations (LLC). Specifically, White Oaks Investment Management,

Inc. acts as investment adviser to these limited liability companies that include (1) White Oaks Aggressive Growth Fund, LLC, (2) White Oaks Alternative Strategies Fund, LLC, (3) White Oaks Low Volatility Fund, LLC, (4) White Oaks Moderate Growth Fund, LLC and (5) White Oaks Flexible Strategies Fund, LLC. These funds also have a matching offshore fund for IRA monies, and those are (6) White Oaks Aggressive Growth Fund, SP, (7) White Oaks Alternative Strategies Fund, SP, (8) White Oaks Low Volatility Fund, SP, (9) White Oaks Moderate Growth Fund, SP, and (10) White Oaks Flexible Strategies Fund, SP. White Oaks Wealth Advisors Flexible Strategies SP and LLC funds do have a performance fee as part of the compensation coupled with a lower management fee.

Such LLCs shall be comprised of advisory clients who shall enjoy status as members in such LLCs. Rather than White Oaks providing investment supervisory service support directly to such advisory clients, such investment supervisory support shall instead be provided directly to the LLCs.

In an effort to have the availability of reasonably priced institutional trust services to White Oaks clients, White Oaks has a minority ownership interest in a savings and loan holding company, National Advisors Holdings, Inc. (“NAH”) that has formed a federally chartered trust company, National Advisors Trust Company (“NATC”). NAH and NATC are regulated by the OTS (Office of the Comptroller of the Currency). White Oaks refers clients to NATC for trust and custodial services.

Although White Oaks stopped selling insurance in 1999, the firm does continue to receive life insurance renewal income. This amount is less than \$100 per year.

ITEM 11

Ethical conduct is important to White Oaks and its clients. As such, White Oaks has adopted a written Code of Ethics that is in compliance with SEC rule 204A-1. The code sets forth standards of conduct and requires compliance with federal securities laws. Our code also addresses personal securities trading and requires our personnel to report their personal securities holdings and transactions to the Chief Compliance Officer of the firm, Sharon Alison Bloodworth. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

White Oaks is in, and shall continue to be in, total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, White Oaks has adopted a firm wide policy statement outlining insider trading compliance by White Oaks and its associated persons and other employees. This statement has been distributed to all employees of White Oaks and has been signed and dated by each such person. A copy of the firm wide policy is left with each person and the original is maintained in a master file.

White Oaks also has adopted a written supervisory procedures statement highlighting the steps that shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of White Oaks and are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing ongoing continuing education, (3) restricting and/or monitoring trading on those securities of White Oaks employees that may have non-public information, (4) requiring all of White Oaks employees to report transactions promptly to White Oaks and (5) monitoring the securities trading of the firm, its employees and associated persons.

White Oaks or individuals associated with the applicant may buy or sell securities identical to those recommended to clients for their personal account.

It is the express policy of White Oaks that no person employed by the applicant may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

White Oaks or any related person(s) may have an interest or position in certain security(ies) which may also be recommended to a client.

As these situations may represent a conflict of interest, White Oaks has established the following restrictions in order to ensure its fiduciary responsibilities:

(1) A director, officer, or employee of White Oaks shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. (2) No associated person of White

Oaks shall prefer his or her own interest to that of the advisory client. (3) White Oaks maintains a list of all securities for itself and Family/Household members with White Oaks. These holdings are reviewed on a regular basis by Sharon Alison Bloodworth, Chief Compliance Officer. (4) White Oaks requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices. (5) Any individual not in observance of the above may be subject to termination.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

ITEM 12

White Oaks does not require that clients use a particular brokerage firm as part of its work. That being said, there are relationships that have been established that make it easier to use certain firms. Two that have been used widely by White Oaks are Charles Schwab and National Advisors Trust Company. Key considerations for their selection are the availability of electronic downloads of information, dedicated service

teams, costs and ease of use by our internal staff. These are benefits that would not be enjoyed if White Oaks were not in the investment advisory business. Overall costs are a consideration and will be discussed with a client prior to implementation. As part of our relationship with our custodians, we may receive research information and use their trading platforms.

Product sponsors and vendors will at times pay for associated persons of the firm to attend educational conferences in other cities. We evaluate each conference and will send members of the White Oaks team if it is deemed to provide significant education and value. White Oaks also budgets money for continuing education conferences so it is not reliant on sponsor/vendor events exclusively for educational needs.

Outside managers used by White Oaks may block client trades at their discretion.

Block trading (bunching transactions) is permitted where the following conditions are met; 1) Orders of two or more clients may be bunched only if we have determined, on an individual basis, that the securities order is a) in the best interest of each client participating in the order; b) consistent with our duty to seek best execution; and c) consistent with terms of the investment advisory agreement of each participating client. 2) Any investments by one client shall not be dependent or contingent upon the willingness or ability of another client to participate in such transaction. 3) Separate documentation relating to the transaction shall be generated and maintained for each client participating in the bunched trade. 4) The terms negotiated for the bunched transaction should apply equally to each participating client. 5) The allocation of securities purchased or sold in a bunched trade must be made in accordance with our allocation procedures.

ITEM 13

Financial Planning Review Procedures: financial planning clients are offered annual review meetings, but can elect to meet more often. Reviews can cover a review of the client's objectives plus changes in cash flow, wealth transfer strategies, investment, risk management, assets, liabilities or other circumstances. Outstanding recommendations are reviewed and actions determined to achieve completion. Client accounts are reviewed by the advisors of the firm including Sharon Bloodworth, Laura Bereiter and Betsy England.

Investment Management Review Procedures: White Oaks uses several sources of public information to evaluate current investment policies and strategies for its clients. Advisory client accounts are reviewed on a monthly basis by reviewing the performance, current allocation, specific investment holding/strategies and overall holdings. White Oaks uses separately managed accounts, mutual, index and exchange traded funds and individual securities in implementing client investment strategies and uses several sources of information to evaluate relative performance as determined by the clients'

indicated goals and objectives. These sources include, but are not limited to, Ned Davis Research, Connors Research, Morningstar, Schwab Institutional and a variety of other public resources. Asset management client accounts are with custodians that provide for electronic downloads and are updated for transactions and pricing daily. Accounts where the custodian does not provide electronic downloads are posted and priced quarterly. Performance results are reviewed each month and compared to indexes having comparable style including, but not limited to: S&P 500, Russell 1000 Growth Index, Russell 1000 Value Index, Russell 2000 Growth Index, Russell 2000 Value Index, Barclays Intermediate Government-Corporate Bond Index, MSCI ACWI, MSCI EAFE and the Wilshire REIT Index.

White Oaks continuously is reviewing existing managers and others. When managers no longer meet the client criteria, replacements are made. Client accounts are reviewed by the investment, advising and operations members of the firm including Sharon Bloodworth, Laura Bereiter, Betsy England, Cyndi Castle, Meryl Roberts, Alex Duty, and Micki Kastel.

Reports are given to investment management clients on a quarterly basis that include a list of current holdings, transactions and performance.

ITEM 14

White Oaks values its independence, and as such, does not currently participate in external paid referral programs.

ITEM 15

White Oaks does take custody of client accounts and assets in some, but not all, situations. Family Office clients have provided access to allow for the managing of banking relationships including the payment of bills, transferring of funds, securing credit and many other items. This also includes brokerage and investment firms where the client has expressly granted access. Another example is the ability to access an individual's 401(k) account online and make changes is defined as having custody. A firm that does have custody like White Oaks is required to have an annual surprise custody audit. A copy of that audit is available for review upon request.

Not all assets are subject to the custody rule (SEC rule 206-4(6)). Some assets are held by firms that qualify under the SEC rule and are termed "qualified custodians". These relationships are not subject to audit as there is exception for the audit requirement under SEC guidelines. Private Funds referred to in item 4 are subject to audit as well as all relationships where there is specific

authorization such as a power of attorney granted to White Oaks. The majority of the assets the firm supervises are subject to audit.

Many of our clients ask White Oaks to hold a standing letter of authorization on their accounts to facilitate distributions to a third party. Although these count as custody assets, these accounts are not subject to the surprise audit as they meet the following seven conditions:

- (8) *The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.*
- (9) *The client authorizes White Oaks, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.*
- (10) *The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.*
- (11) *The client has the ability to terminate or change the instruction to the client's qualified custodian.*
- (12) *White Oaks has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.*
- (13) *The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.*
- (14) *White Oaks maintains records showing that the third party is not a related party of White Oaks or located at the same address as White Oaks.*

ITEM 16

In that White Oaks will work through Charles Schwab, National Advisors Trust Company and client-selected brokers, White Oaks will have discretionary authority and will therefore have the ability, without first obtaining specific consent, to determine the securities to be bought or sold, the amount of securities to be bought or sold, the broker, dealer or institution to be used and the commissions rates paid.

ITEM 17

The firm does not vote proxy statements on behalf of advisory clients. Therefore, clients maintain exclusive responsibility for: (1) voting proxies and (2) acting on corporate actions. pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote or corporate action, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

ITEM 18

No financial reporting is required as (A) the firm does not receive fees more than six (6) months in advance, (B) is not in a precarious financial condition and (C) has never been the subject of a bankruptcy petition.

Brochure Supplement



Sharon Alison Bloodworth, CFP®
Laura Anne Bereiter, CPA, PFS™, CFP®
IARD No: 173522

Phone: 612.455.6900
Web: whiteoakswealth.com

This brochure supplement is furnished in tandem with Part 2A and provides information about Sharon Alison Bloodworth and Laura Anne Bereiter that supplements the White Oaks Wealth Advisors, Inc. brochure. Please contact Sharon Alison Bloodworth, Chief Compliance Officer, if you have any questions about the contents of this supplement.

Additional information is available on the SEC's website at www.adviserinfo.sec.gov.

Effective February 2024

**Sharon Bloodworth, CFP®**

Born 1970

CRD No. 2756129

Sharon is the owner and CEO of White Oaks and has been with the company since February 2001. In 2017, she purchased the firm, making it one of the largest independent investment advisory firms owned wholly by a woman in Minnesota and Florida. In 2023, Sharon was included on the Notable Women in Wealth Management list by the Twin Cities Business Magazine*.

Her experience in the financial services industry dates back to 1993 and includes positions at American Express Financial Advisors as a Financial Advisor and Lord, Abnett & Co as a Client Liaison in New York. In 2019, Sharon received the Marty Baskerville Philanthropy Award* to recognize her Rotary lifetime achievements and the Vistage Lifetime Achievement Award* for leadership in her CEO peer to peer organization. She was honored as a 2013 “Top Women in Business”* and a 2010 “40 under 40”* recipient by the Minneapolis/St. Paul Business Journal. Sharon has been quoted in the Minneapolis/St. Paul Business Journal, CBS Money Watch, USA Weekend, MSN Money, The Financial Times Advisor IQ, Forbes.com, Glamour and CNN Money. She frequently speaks on market and economic issues, wealth planning and how to better prepare the next generation for wealth.

Sharon holds a Bachelor’s Degree in European Community Studies from the University of Wales, College of Cardiff. In continuing education, she received a certificate in International Business Practice from the Mountbatten Program and Oxford University, and in 2019, she completed the Vistage Executive Leadership Program in collaboration with the Stanford Graduate School of Business. She also holds the CERTIFIED FINANCIAL PLANNER™ designation and is a member of NAPFA, a fee-only fiduciary professional association with the most rigorous continuing education requirements in the industry.

Sharon is a past Vice-Chair for the Minnesota Opera board. She has a deep passion for Rotary having been a member of Rotary Club #9 for 20 years and serving as its President in 2012. Starting in July 2024, she will be a Rotary District Governor. She completed the largest ever fundraiser for her Rotary District, raising \$3 million on top of the usual annual \$1 million as District Foundation Chair in 2023. She is also a member of the CEOs Against Cancer - Minnesota chapter of the American Cancer Society.

Born in the UK, Sharon has lived and studied in Africa, Asia and Europe and speaks multiple languages. In 2007, she funded the rebuilding of a kindergarten in Indonesia that she named after her daughter – Sophia’s Sunshine School. In 2021, she added a library to the school. Sharon has a strong interest in the financial success of athletes. On a pro bono basis with the Women’s Tennis Benefit Association, she coaches the top current and former women in tennis on financial behaviors. She is a five-time Minnesota State Fair blue-ribbon winner for flower arranging, and she collects shoes of very famous women, including Margaret Thatcher and Audrey Hepburn.

***Top Women in Business – Minneapolis/St. Paul Business Journal**

Women in Business awards honor industry-leading executives, entrepreneurs and business owners for their professional accomplishments and community involvement. These awards honor women in various business categories who have proven to be dynamic and outstanding leaders with established track records of significant accomplishments in business and/or community service. To be eligible, nominees must work in the 24-county Twin Cities metro area, including Anoka, Benton, Blue Earth, Carver, Chisago, Dakota, Freeborn, Goodhue, Hennepin, Isanti, Le Sueur, Mower, Nicollet, Olmsted, Ramsey, Rice, Scott, Sherburne, Stearns, Steele, Washington, Wright, Pierce and St. Croix counties.

***40 under 40 – Minneapolis/St. Paul Business Journal**

Judges will select 40 honorees based on their professional accomplishments, demonstrated leadership and community contributions. To be eligible, nominees must work in the 24-county Twin Cities metro area, including Anoka, Benton, Blue Earth, Carver, Chisago, Dakota, Freeborn, Goodhue, Hennepin, Isanti, Le Sueur, Mower, Nicollet, Olmsted, Ramsey, Rice, Scott, Sherburne, Stearns, Steele, Washington, Wright, Pierce and St. Croix counties. Nominees must be 39 or younger in March of the year of award. Self-nominations are accepted.

***Marty Baskerville Philanthropy Award**

The Marty Baskerville Philanthropy Award is presented annually to a Minneapolis Rotarian who has made a significant difference in furthering the objectives of the Minneapolis Rotary Community Service Foundation or the Rotary International Foundation. The award is presented to a member who has demonstrated over time a strong commitment to the service mission of Rotary.

***Vistage Lifetime Achievement Award**

Founded in 1957, Vistage Worldwide is designed exclusively for high-integrity CEOs and executive leaders who are looking to drive better decisions and better results for their companies, families and communities. Members gather in confidential peer groups, led by an accomplished business leader, to gather fresh perspectives and objective advice on their toughest challenges. Today, more than 22,000 executives across 20 countries rely on Vistage. In Minnesota, Vistage member companies generate \$9.3 billion in annual revenues and employ more than 33,000 people. There are over 400 CEOs and key executive members.

Lifetime Achievement Award achievers are those members who have a track record of decisions whose benefits permeate company, community and beyond. They have been with Vistage for years and exemplify a spirit of continued growth and learning. They share their wisdom — drawn from a deep well of experience — to support their fellow members. They inspire. A nomination for the Lifetime Achievement Award honors this commitment to learning and development, and a commitment to fellow Vistage members, every step of the way.

***Notable Women in Wealth Management Award**

The individuals featured did not pay to be included. Their profiles were drawn from nomination materials. This list is not comprehensive; it includes only people who were nominated and accepted after editorial review. To qualify for this list, individuals must have at least five years of experience in their field and have shown the ability to effect change in their roles or areas of practice.

**Laura Bereiter, CPA, PFS™, CFP®**

Born 1987

CRD No. 6713023

Laura is the Director of Tax and Financial Planning at White Oaks and has been with the company since October 2015. Her career started in Deloitte's Private Wealth practice in Minneapolis, where she focused on tax compliance and consulting engagements for high net worth individuals and families.

Laura holds a Bachelor of Science in Business degree with a Major in Accounting and a Master of Accountancy degree, both from the University of Minnesota. She received her CPA certification in 2011, her CERTIFIED FINANCIAL PLANNER™ certification in 2016 and her Personal Financial Specialist™ certification in 2019. Laura is also a member of NAPFA, a fee-only fiduciary professional association with the most rigorous continuing education requirements in the industry.

She has appeared in TV and radio segments on Kare 11 and WCCO. She has been quoted on CNBC.com, Acorns, InvestmentNews, Financial Advisor and ThinkAdvisor. With the Minnesota Society of CPAs, Laura serves as a spokesperson in the local media and also as a member of the conformity taskforce to offer guidance related to the differences between federal and Minnesota tax legislation.

Laura joined the board of East Side Neighborhood Services in 2020 and serves as the board's Treasurer.

Laura grew up in Chanhassen, Minnesota, and currently lives in St. Louis Park with her husband, son, and yellow lab. When she's away from the office, Laura enjoys supporting Gopher athletics, visiting local breweries, and cooking a new recipe.

Credentials

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 62,000 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, administered in 6 hours over one-day, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;*
- *Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and*
- *Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.*

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

- *Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and*
- *Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.*

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CERTIFIED PUBLIC ACCOUNTANT (CPA)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience, and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or has created their own.

PERSONAL FINANCIAL SPECIALIST (PFS™)

The AICPA's Personal Financial Specialist (PFS™) credential is granted exclusively to CPAs with the powerful combination of extensive tax expertise and comprehensive knowledge of financial planning. This knowledge is critical for obtaining the most valuable, objective advice possible. All areas of personal financial planning — including estate, retirement, investments and insurance — have tax implications. The CPA/PFS credential program has several key objectives including (1) Standardize and enhance the quality of PFP services that CPA financial planners provide by serving as the CPA exclusive mark of excellence in financial planning, (2) Increase practice development and career opportunities for CPA/PFS credential holders, (3) Help credential holders promote their practices through the PFP website and the development of CPA/PFS marketing tools, and (4) Increase professional and public awareness of CPA/PFS as the preferred personal financial planning credential.

Disciplinary Information

None.

Other Business Activities

Sharon Alison Bloodworth is also CEO of White Oaks Investment Management, Inc.

Additional Compensation

None.

Supervision

All supervised persons are supervised by the Chief Compliance Officer of the firm, Sharon Alison Bloodworth.