



## **Avantra Family Wealth, Inc.**

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

**Effective: April 24, 2024**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Avantra Family Wealth, Inc. ("Avantra" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (717) 276-1501.

Avantra 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 through Avantra to assist you in determining whether to retain the Advisor.

Additional information about Avantra and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288209.

**Avantra Family Wealth, Inc.**  
**100 Sterling Parkway, Suite 107, Mechanicsburg, PA 17050.**  
**Phone: (717) 276-1501 \* Fax: (717) 276-1540**  
[www.avantrafamilywealth.com](http://www.avantrafamilywealth.com)

## **Item 2 – Material Changes**

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Form ADV Part 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 Avantra. For convenience, the Advisor has combined these documents into a single disclosure document.

Avantra believes that communication and transparency are the foundation of its relationship with clients, as such term is defined within this Disclosure Brochure, and will continually strive to provide you with complete and accurate information at all times. Avantra encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes made to this Disclosure Brochure since the last filing and distribution to clients.

### 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 each Client annually and if a material change occurs in the business practices of Avantra. You may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288209. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (717) 276-1501.

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## Item 4 – Advisory Services

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### A. Firm Information

Avantra Family Wealth, Inc. (herein “Avantra” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a corporation under the laws of the State of Pennsylvania. Avantra was founded in April 2017 and is owned and operated Kim Lee Kenawell (Founder and Chief Executive Officer), and Wade A. Hoffman (Founder and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Avantra.

### B. Advisory Services Offered

Avantra offers investment advisory services to individuals and high net worth individuals (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. Avantra’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.

#### Wealth Management Services

Avantra provides comprehensive wealth management services for its Clients, which include customized investment management and financial planning services. Clients may also engage the Advisor for these services individually.

#### Investment Management Services

Avantra provides customized investment advisory solutions for its Clients. The Advisor’s goal is to help the Client achieve their financial goals while mitigating risk. This is achieved through personal Client contact and interaction while providing discretionary investment management and related advisory services. In certain situations, the Advisor also provides non-discretionary investment management services in addition to or instead of discretionary investment management services. Avantra works closely with each Client to develop an investment strategies that seeks to achieve the goals of the Client.

*Internal Investment Management* - Avantra customizes its investment management services for its Clients. Portfolios are primarily constructed using mutual funds, exchange-traded funds (“ETFs”), individual stocks and fixed income securities. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of each particular Client. The Advisor will retain certain legacy investments based on portfolio fit and/or tax considerations.

Avantra evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Avantra’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. If it is consistent with the Client’s goals, the Advisor may also engage in an investment strategy that utilizes frequent trading in securities; please see Item 8 for more information. Avantra will construct, implement and monitor the portfolio taking into consideration the goals, objectives, circumstances, and risk tolerance communicated to the Advisor 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.

Avantra may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Avantra may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Avantra may recommend selling 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 the Client's risk tolerance, generating cash to meet the Client's needs, or any risk deemed misaligned with the Client's communicated risk tolerance.

At no time will Avantara 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 their account[s] held at the respective Custodian, pursuant to the Client's investment advisory agreement, please see Item 12 – Brokerage Practices.

*Use of Independent Managers* - Avantara may recommend to Clients that all or a portion of their investment portfolio be implemented by utilizing one or more unaffiliated money managers or investment platforms (collectively "Independent Managers"). Independent Managers may be sourced directly or accessed through an investment management platform. The Client will be required to enter into a separate agreement with the Independent Manager[s].

Avantara serves as the Client's primary advisor and relationship manager. However, the Independent Manager[s] will assume discretionary authority for the day-to-day investment management of those assets placed in their control. Avantara will assist and advise the Client in establishing investment objectives for their account[s], the selection of the Independent Manager[s], and defining any restrictions on the account[s]. Avantara will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities of these unaffiliated parties. The Independent Manager[s] will implement the selected investment strategies based on their investment mandates. The Client may be able to impose reasonable investment restrictions on these accounts, subject to the acceptance of these third parties. Avantara does not receive any compensation from these Independent Managers or Investment Platforms, other than its investment advisory fee. Please see Item 5 – Fees and Compensation.

*Retirement Accounts* – When deemed to be in the Client's best interest, the Advisor will recommend that a Client take 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. 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

Avantara will typically provide a variety of financial planning services to Clients, as a component of our wealth management services, but is also offered under a separate agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, insurance needs, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Avantara may also refer Clients to an accountant, attorney or other specialist, as the Advisor deems appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's communicated financial situation, along with the Advisor's observations and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

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, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any financial

planning recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the financial planning recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

The Advisor may also be engaged separately for divorce planning services. These services may include, but are not limited to, pre-divorce financial counseling and education, assistance with financial forms, analysis of financial positions, analysis of proposed marital settlement, financial mediation, analysis of income tax effects and financial impact forecasting. The Advisor may also serve in either a mediation or financial neutral capacity, separate from advisory services rendered. Please see Item 10 – Financial Industry Affiliations for additional details.

### **C. Client Account Management**

Prior to engaging Avantra to provide investment advisory services, each Client is required to enter into one or more advisory 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 – Avantra, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Avantra 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 – Avantra will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Avantra will provide investment management and ongoing oversight of the Client's investment portfolio.
- Financial Planning – For Clients engaging for wealth management services, the Advisor provides ongoing financial planning and related services regarding the Client's overall financial situation.

### **D. Wrap Fee Programs**

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

### **E. Assets Under Management**

As of December 31, 2023, Avantra manages \$158,290,952 in Client assets, \$147,720,366 of which are managed on a discretionary basis and \$10,570,586 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Avantra and the Client, along with the relevant fees to be charged to the Client.

### **A. Fees for Advisory Services**

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined fee for investment management and financial planning services based on the market value of assets under management.

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the ending market value of the Client's account[s] at the end of the prior calendar quarter. Investment advisory fees range from 0.05% to 2.00% annually based on the amount of assets under management and the complexity of the Client's needs and financial situation.

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. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Avantra will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses 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.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. The Independent Manager will allocate a portion of the advisory fee collected to the Advisor pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 3.00% annually.

#### Financial Planning Services

Avantra offers financial planning services on either an hourly basis, a fixed engagement fee or an annual retainer. Hourly engagements are billed at a rate of up to \$300 per hour. Fixed fee engagements are negotiated based on a range of \$500 to \$5,000 based on the nature and complexity of services to be provided. Retainers are based on a negotiated annual fee of \$500 to \$5,000 based on the nature and complexity of services to be provided. Fees may be negotiable at the sole discretion of the Advisor, depending on the nature and complexity of services to be provided. An estimate for total hours and/or costs will be provided to the Client prior to engaging for these services.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 365 multiplied by the number of days in the quarter) to the total assets under management with the Advisor at the end of the prior quarter, as provided by the Client's designated Custodian. Clients will be provided with a statement from the Custodian, at least quarterly, 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 Avantra directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

Client account[s] implemented through Independent Manager[s] will be billed in accordance with the separate agreement[s] with the respective parties. These parties will typically add Avantra's investment advisory fee and deduct the overall fee from the Client's account[s].

#### Financial Planning Services

Fees for hourly and fixed fee financial planning engagements are invoiced by the Advisor and are due at the respective month end date or upon completion of the agreed upon deliverable[s]. Certain Clients may have their planning fees included with their overall investment advisory fees.

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

Clients may incur certain fees or charges imposed by third parties, other than Avantra, 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 typically charges for mutual funds and other types of investments. The investment advisory fee charged by Avantra is separate and distinct from these custody and execution fees.

In addition, all fees paid to Avantra 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 Avantra, but would not receive the services provided by Avantra which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Avantra to fully understand the total fees to be paid.

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

##### Investment Management Services

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

##### Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest, the Advisor will have the discretion to terminate the relationship with the Independent Manager. The terms for termination are set forth in the respective agreements between the Advisor and the Independent Managers.

##### Financial Planning Services

For hourly and fixed fee engagements, Avantra is compensated for its services at the respective month end date or upon completion of the agreed upon deliverable[s]. 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. For hourly and fixed fee engagements, the Client shall be billed for actual hours logged on the planning project at the contractual hourly rate. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

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

Avantra 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.

Certain Advisory Persons of Avantra are registered representatives of also Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. As a registered representative of PKS, certain Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative Please see Item 10.



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

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

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

Avantra 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.

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## **Item 7 – Types of Clients**

Avantra offers investment advisory services to individuals and high net worth individuals. 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. Avantra does not impose a minimum size for establishing a relationship.

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

### **A. Methods of Analysis**

Avantra primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from Avantra are 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. In addition to fundamental analysis, Avantra may also employ proprietary strategies, including technical strategies based on market internals.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of 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.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Avantra will be able to accurately predict such a reoccurrence.

As noted above, Avantra generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Avantra will typically 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, Avantra 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 or asset class.

## **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. Avantra 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.

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

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

### Market Risks

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

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The value of the ETFs will fluctuate with the value of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low volume. Authorized participants in an ETF may change at any time; this may result in change to the liquidity and the ability to redeem the ETF as the authorized participants control the number of shares of the ETF. The value of an ETF fluctuates based upon the market movements and may disassociate from the index being tracked or from the value of the underlying investments. An ETF purchased or sold at one point in the day may have a different value than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

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

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

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Avantra or any of its management persons.** Avantra 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 are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 288209.

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

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### Broker-Dealer Affiliation

As stated in Item 5, certain Advisory Persons are also registered representatives of PKS. In their separate capacity as registered representatives, these Advisory Persons will typically receive commissions for the

implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor the Advisory Person will earn any investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative.

#### Insurance Agency Affiliations

As stated in Item 5, certain Advisory Persons are also independent licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with Avantra. As an insurance professional, the Advisory Person will receive customary commissions and other related revenues from the various insurance companies for which products are sold. These Advisory Person are not required to offer the products of any particular insurance company. Commissions 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. Clients are under no obligation to implement any recommendations made by the Advisor or the Advisory Persons.

#### Divorce Planning Services

The Advisor may be separately engaged to serve as either a mediator or financial neutral for collaborative divorce needs. This activity is to assist any third party, such as attorneys or accountants, with collaborative divorce resolutions or divorce negotiations. This activity is either provided separately or included with any financial divorce planning, based on the needs of the Client or third party.

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

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

Avantra has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all associated persons of Avantra ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Avantra and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Avantra associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (717) 276-1501.

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

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

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

Avantra 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 potential conflict of interest that, as fiduciaries, must be disclosed and mitigated through policies and procedures. As noted above, the Advisor has adopted a Code of Ethics, which addresses insider trading (material non-public information controls), gifts and entertainment; outside business activities and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Avantra have a conflict of interest if trading in the same securities as Clients. 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 Avantra 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.

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

While Avantra 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 Avantra, or any Supervised Person of Avantra, transact in any security to the detriment of any Client.

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

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

Where Avantra does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] 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 fee or cost associated with using a Custodian not recommended by Avantra. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Avantra 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. Avantra does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other broker dealers/custodians. Avantra will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Avantra maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. 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 a broker-dealer/custodian in exchange for research and other services. **Avantra does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian, other than the benefits from Schwab as detailed below in Item 14 below.**

**2. Brokerage Referrals** - Avantra 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 Avantra 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]). Avantra 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. The Advisor does not seek best execution on a trade-by-trade basis, but evaluates the execution quality of the Custodian as part of its annual review of service providers.

### 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. Avantra will execute its transactions through the Custodian as directed by the Client. Avantra may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. 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 particular Client accounts.

## **Item 13 – Review of Accounts**

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

Investments in Client's account[s] are monitored on a regular and continuous basis by Wade A. Hoffman, Chief Compliance Officer of Avantra. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

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

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Avantra if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

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

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

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### **A. Compensation Received by Avantra**

Avantra does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Avantra may refer Clients to various third parties to provide additional support services to the Client, such as attorneys, accountants and other service providers. The Advisor does not share in the revenue with these providers.

#### Participation in Institutional Advisor Platform

Avantra has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Avantra. As a registered investment advisor participating in the Schwab Advisor Services platform, Avantra 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 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 to Avantra that may not benefit the Client, including: educational conferences and events, financial start-up support, 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. Avantra believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

## **B. Compensation for Client Referrals**

Avantra does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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The Client authorizes the deduction of the Advisor's fees through the execution of the investment advisory agreement and the Custodian's account applications. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Avantra to utilize the Custodian for the Client's security transactions. Avantra encourages Clients to review statements provided by the Custodian. For more information about Custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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Avantra generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Avantra. 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 Avantra will be in accordance with each Client's investment objectives and goals. There may be limited circumstances when the Advisor offers non-discretionary investment management services in addition to or instead of discretionary investment management services.

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

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Avantra 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**

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





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

**for**

**Kim Lee Kenawell, AWMA<sup>®</sup>, CDFA<sup>™</sup>, CRPC<sup>®</sup>, MSFS  
Founder, Chief Executive Officer, and Senior Family Wealth Advisor**

**Effective: April 24, 2024**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kim Lee Kenawell (CRD# 2681649) in addition to the information contained in the Avantra Family Wealth, Inc. ("Avantra" or the "Advisor", CRD# 288209) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avantra Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (717) 276-1501.

Additional information about Ms. Kenawell is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2681649.

## Item 2 – Educational Background and Business Experience

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Kim Lee Kenawell, born in 1974, is dedicated to advising Clients of Avantra as a Founder, Chief Executive Officer, and Senior Family Wealth Advisor. Ms. Kenawell earned a Master of Science in Financial Services (MSFS) from The American College of Financial Services in 2016. Ms. Kenawell also earned a Bachelor of Science in Finance from Pennsylvania State University in 1996. Additional information regarding Ms. Kenawell's employment history is included below.

### Employment History:

Founder, Chief Executive Officer, and Senior Family Wealth Advisor, Avantra Family Wealth, Inc.	07/2017 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	07/2017 to Present
Senior Vice President, Merrill Lynch, Pierce, Fenner & Smith Incorporated	09/1996 to 07/2017

### Accredited Wealth Management Advisor<sup>SM</sup> ("AWMA<sup>®</sup>")

Individuals who hold the AWMA<sup>®</sup> designation have completed a course of study across eight modules to provide financial advice to high net worth clients, pass the final examination and complete the designation application. Continued use of the designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the designation by:

- Completing 16 hours of continuing education;
- Reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- Paying a biennial renewal fee.

AWMA<sup>®</sup> and Accredited Wealth Management Advisor<sup>SM</sup> are registered service marks of the College for Financial Planning.

### Certified Divorce Financial Analyst ("CDFA<sup>TM</sup>")

The Certified Divorce Financial Analyst<sup>TM</sup>, (CDFA<sup>TM</sup>) is a professional certification granted in the United States and Canada by the Institute for Divorce Financial Analysts<sup>TM</sup> (IDFA<sup>TM</sup>). To attain the right to use the CDFA<sup>TM</sup> (Certified Divorce Financial Analyst<sup>TM</sup>) certification, an individual must satisfactorily fulfill the following requirements:

- Education – Professionals must develop their theoretical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the IDFA<sup>TM</sup>;
- Examination – Practitioners must pass a four-part (in the USA) or three-part (in Canada) Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process;
- Experience – Individuals must have a minimum of three years' experience in a financial or legal capacity prior to earning the right to use the CDFA<sup>TM</sup> certification mark; and
- Ethics – Practitioners agree to abide by a strict code of professional conduct known as the "Code of Ethics and Professional Responsibility," which sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA<sup>TM</sup> may perform a background check during this process, and each candidate for CDFA<sup>TM</sup> certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.

Individuals who become certified must complete the following ongoing education requirements in order to maintain the right to continue to use the CDFA<sup>TM</sup> designation:

- Continuing Education – Complete a minimum of fifteen (15) hours of continuing education every two years, that are specifically related to the field of divorce, and
- Ethics – Practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process. If a complaint has been brought against a CDFA<sup>TM</sup> by another professional or member of the general public, the CDFA<sup>TM</sup> must be examined and cleared by IDFA's Ethics Committee to maintain their designation.

#### Chartered Retirement Planning Counselor (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing sixteen (16) hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Ms. Kenawell.*** Ms. Kenawell 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. Kenawell.

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. Kenawell.***

The Advisor encourages you to independently view the background of Ms. Kenawell on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 2681649.

### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Ms. Kenawell is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Ms. Kenawell’s separate capacity as a registered representative, Ms. Kenawell will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Kenawell. Neither the Advisor nor Ms. Kenawell will earn any investment advisory fees in connection with any products or services implemented in Ms. Kenawell’s separate capacity as a registered representative.

#### Insurance Agency Affiliations

Ms. Kenawell is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Ms. Kenawell’s role with Avantra. As an insurance professional, Ms. Kenawell will receive customary commissions and other related revenues from the various insurance companies for which products are sold. Ms. Kenawell is not required to offer the products of any particular insurance company. Commissions 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. Clients are under no obligation to implement any insurance recommendations made by Ms. Kenawell.

### Item 5 – Additional Compensation

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

### Item 6 – Supervision

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Ms. Kenawell serves as a Founder, Chief Executive Officer, and Senior Family Wealth Advisor of Avantra and is supervised by Wade Hoffman, the Chief Compliance Officer. Mr. Hoffman can be reached at (717) 276-1501.

Avantra has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Avantra. Further, Avantra is subject to regulatory

oversight by various agencies. These agencies require registration by Avantra and, in certain instances, certain of its Supervised Persons. As a registered entity, Avantra is subject to examinations by regulators, which may be announced or unannounced. Avantra 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.

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**Avantra Family Wealth, Inc.**

100 Sterling Parkway, Suite 107, Mechanicsburg, PA 17050

Phone: (717) 276-1501 \* Fax: (717) 276-1540

[www.avantrafamilywealth.com](http://www.avantrafamilywealth.com)



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

**for**

**Wade A. Hoffman**  
**Founder and Chief Compliance Officer**

**Effective: April 24, 2024**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Wade A. Hoffman (CRD# 2825341) in addition to the information contained in the Avantra Family Wealth, Inc. ("Avantra" or the "Advisor", CRD# 288209) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avantra Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (717) 276-1501.

Additional information about Mr. Hoffman is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2825341.

## Item 2 – Educational Background and Business Experience

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Wade A. Hoffman, born in 1974, is dedicated to advising Clients of Avantra as a Founder and Chief Compliance Officer. Mr. Hoffman attended Shippensburg University. Additional information regarding Mr. Hoffman's employment history is included below.

### Employment History:

Founder and Chief Compliance Officer, Avantra Family Wealth, Inc.	07/2017 to Present
Registered Representative, David A. Noyes & Company	12/2018 to 06/2021
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	07/2017 to 12/2018
Administrative Manager, Merrill Lynch, Pierce, Fenner & Smith Incorporated	04/2011 to 06/2016
Complex Risk Officer, Morgan Stanley Smith Barney LLC	06/2009 to 03/2011
Operations Manager, Citigroup Global Markets Inc.	10/1996 to 03/2011

## Item 3 – Disciplinary Information

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

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. Hoffman.***

The Advisor encourages you to independently view the background of Mr. Hoffman on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2825341.

## Item 4 – Other Business Activities

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### Bates Group LLC

Mr. Hoffman also serves as a consultant for Bates Group LLC ("Bates Group"). Bates Group provides consulting services for Registered Investment Advisors, which primarily includes supervision and compliance services. Services of Bates Group are not offered to Client of the Advisor.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Hoffman serves as a Founder and Chief Compliance Officer of Avantra. Mr. Hoffman is supervised by the Founder and Chief Executive Officer, Kim Lee Kenawell. Ms. Kenawell can be reached at (717) 276-1501.

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





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

**for**

**Steven B. Thompson  
Chief Operating Officer and Family Wealth Advisor**

**Effective: April 24, 2024**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Steven B. Thompson (CRD# 4357058) in addition to the information contained in the Avantra Family Wealth, Inc. ("Avantra" or the "Advisor", CRD# 288209) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avantra Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (717) 276-1501.

Additional information about Mr. Thompson is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4357058.

## Item 2 – Educational Background and Business Experience

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Steven B. Thompson, born in 1968, is dedicated to advising Clients of Avantra as the Chief Operating Officer and a Family Wealth Advisor. Mr. Thompson earned a Master of Arts from the University of Connecticut in 1993. Mr. Thompson also earned a Bachelor of Arts in Economics and Theatre from Bucknell University in 1990. Additional information regarding Mr. Thompson's employment history is included below.

### Employment History:

Chief Operating Officer and Family Wealth Advisor, Avantra Family Wealth, Inc.	07/2017 to Present
Registered Representative, David A. Noyes & Company	12/2018 to 06/2021
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	02/2015 to 07/2017
Financial Advisor, Bank of America, N.A.	02/2015 to 07/2017
Administrative Manager/Administrative Manager Assistant/Client Services Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporated	04/2000 to 02/2015

## Item 3 – Disciplinary Information

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

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. Thompson.***

The Advisor encourages you to independently view the background of Mr. Thompson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4357058.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Thompson is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Thompson's role with Avantra. As an insurance professional, Mr. Thompson will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Thompson is not required to offer the products of any particular insurance company. Commissions 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. Clients are under no obligation to implement any recommendations made by Mr. Thompson or the Advisor.

### Bates Group LLC

Mr. Thompson also serves as a consultant for Bates Group LLC ("Bates Group"). Bates Group provides consulting services for Registered Investment Advisors, which primarily includes supervision and compliance services. Services of Bates Group are not offered to Client of the Advisor.

## Item 5 – Additional Compensation

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Mr. Thompson has additional business activities that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Thompson serves as the Chief Operating Officer and a Family Wealth Advisor of Avantra and is supervised by Wade Hoffman, the Chief Compliance Officer. Mr. Hoffman can be reached at (717) 276-1501.

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

## Privacy Policy

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**Effective Date: April 24, 2024**

### **Our Commitment to You**

Avantra Family Wealth, Inc. (herein “Avantra” 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. Avantra (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.

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

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

### **Why you need to know?**

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

### **What information do we collect from you?**

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

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

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

### **How do we protect your information?**

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

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

### How do we share your information?

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

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

### Changes to our Privacy Policy

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

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

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (717) 276-1501.