



3166 Mathieson Dr NE, Suite 200  
Atlanta, GA 30305

(404) 328-2120

ReiconWealthAdvisors.com

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

**March 5, 2024**

This brochure (“Brochure”) provides information about the qualifications and business practices of Reicon Wealth Advisors, LLC (“Reicon” or the “Advisor”). If you have any questions about the contents of this Brochure, please contact us at (404) 328-2120 or Reid Funston at [rfunston@reiconwealth.com](mailto:rfunston@reiconwealth.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state authority.

Reicon Wealth Advisors, LLC is an investment adviser registered with the U.S. Securities and Exchange Commission. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser are intended to provide you with information to assist in your determination as to whether or not to retain the services of that investment adviser.

Additional information about Reicon is available on the SEC’s website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov). The CRD number for Reicon Wealth Advisors, LLC is # 315043.

## Item 2 – Material Changes

This Brochure, dated March 5, 2024, replaces our last other-than-annual amendment, dated June 7, 2023. The purpose of Item 2 of the Brochure is to provide clients with a summary of new and/or updated information that is contained in the remainder of the Brochure.

Since Reicon's last annual amendment, dated March 10, 2023, key updates were made to the following section(s):

- **Item 4 – Advisory Business:** removed language regarding its sub-advisory services.
- **Item 5 – Fees and Compensation:** (i) added language regarding intra-quarter deposits and withdrawals effective and (ii) removed language regarding its sub-advisory services.
- **Item 10 - Other Financial Industry Activities and Affiliations:** removed language regarding its sub-advisory services.
- **Item 13 – Review of Accounts:** removed language regarding its sub-advisory services.
- **Item 15 – Custody:** removed language regarding its sub-advisory services.

Our brochure may be requested free of charge by contacting Reid Funston at (404) 328-2120 or [rfunston@reiconwealth.com](mailto:rfunston@reiconwealth.com). Additional information about us and about our investment advisory representatives ("IARs") is also available via the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 3 – Table of Contents

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

## **Item 4 – Advisory Business**

### General Information

Reicon Wealth Advisors, LLC (“Reicon”) was founded in 2021 under the laws of the State of Georgia. Reicon is principally owned by Waramaug Ventures, LLC, TJD Ventures, LLC, and Mathieson Ventures, LLC. Reid Funston and Theodore Davies serve as Managing Partners.

Reicon offers the following services, each of which is more fully described below:

- Private Special Purpose Vehicles
- Investment Advisory Services

### Private Special Purpose Vehicles

Reicon serves as investment manager and provides management and advisory services to private special purpose vehicles (the “SPVs”). The SPVs, RWA Direct Investments I, LLC and RWA Direct Investments II, LLC, were formed for the sole purpose of co-investing alongside unaffiliated private equity firms in single deal transactions. An affiliate of Reicon, RWA Capital, LLC (“RWA Capital”) serves as General Partner of RWA Direct Investments II, LLC. References herein to the “Adviser” or “Reicon” shall be deemed to include RWA Capital where applicable.

The SPVs are generally focused on direct or indirect private capital investments into companies. Accordingly, interests or shares in the SPVs were offered and sold exclusively to investors satisfying the applicable eligibility and suitability requirements. Such offer or solicitation of interests was made pursuant to the subscription agreement and associated appendices for the applicable SPV.

The assets of the SPVs were invested in accordance with the terms of their governing documents.

### Investment Advisory Services

#### *Investment Plan*

Reicon provides discretionary Investment Advisory Services to high-net-worth individuals, charitable organizations, foundations, and other business entities (and, together with the SPVs, “Clients”).

At the outset of each client relationship, Reicon spends time with the client, asking questions, discussing the client’s investment experience and financial circumstances, tolerance for risk, and broadly identifying major goals of the client. Based on its reviews, Reicon generally develops the investment objectives and guidelines (the “Investment Plan”) with each client.

The Investment Plan outlines the types of investments Reicon will make or recommend on behalf of the client based on Reicon’s own research and analysis in order to meet those goals. The Investment Plan generally includes investment management strategies designed to achieve the client’s near-term and long-term goals while managing the influence of risk on their success. Reicon will help the client understand their overall asset allocation, their investment options, and the Adviser’s recommendations.

The Investment Plan will be updated from time to time when requested by the client, or when Reicon determined it to be necessary or advisable based on updates to the client’s financial or other circumstances. It is the responsibility of the client to notify Reicon of any changes to their financial situation or objectives or any other factors that may impact the client’s Investment Plan.

## *Portfolio Management*

To implement the client's Investment Plan, Reicon will manage the client's investment portfolio on a discretionary basis pursuant to an investment advisory agreement with the client. As a discretionary investment adviser, Reicon will have the authority to supervise and direct the portfolio without prior consultation with the client.

Clients may request, however, certain reasonable restrictions on Reicon in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship, with written notice to Reicon. Clients should note, however, that restrictions, if accepted by Reicon, may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that their investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Reicon.

Certain clients may request that Reicon hold assets in a client's portfolio that are not subject to management by Reicon as an accommodation to the client. If Reicon agrees to hold such assets in a client portfolio, Reicon typically will not charge a management fee with respect to such assets. Clients that enter into such arrangements with Reicon should understand that they will not receive the benefits of Reicon's management services with respect to the unmanaged asset, which means that Reicon will have no obligation to manage, make any recommendation with respect to, monitor or otherwise consider any such asset, even during periods of adverse market conditions or when Reicon otherwise believes that such actions or recommendations are likely to benefit the client or avoid adverse consequences. Clients will remain responsible for any custodial, transaction or other third-party fees and expenses associated with such unmanaged assets.

## General Consulting Services

In addition to the foregoing services, Reicon may provide general consulting services to clients. These services are typically provided when requested by the client and agreed to by Reicon.

## Assets Under Management as of December 31, 2023:

Discretionary: \$ 143,509,018; 46 accounts.

Non-Discretionary: \$0.00; 0 accounts

## **Item 5 – Fees and Compensation**

### General Fee Information

Reicon provides Investment Advisory Services to its clients pursuant to investment advisory and/or subscription agreements (the "Agreements"). The Agreements for each of its clients set forth in detail the fee structure relevant to each client.

Reicon receives compensation from fees based on a percentage of assets under management ("Management Fee") and carried interest ("Carried Interest"). Management fees paid to Reicon are exclusive of all account fees and transaction costs, including, without limitation, brokerage commissions, transaction fees, account fees, charges imposed by custodians, brokers and other third parties such as fees

charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. Fees paid to Reicon are also separate and distinct from the fees and expenses charged by the SPVs (generally including a management fee and fund expenses, as described in each SPV's prospectus, or offering materials). Clients and investors should review all fees charged by Reicon and others to fully understand the total amount of fees to be paid by clients, including the SPVs.

Please see ***Item 12 - Brokerage Practices*** for additional information.

#### Private Special Purpose Vehicles

For advisory services provided to the SPVs, Reicon is entitled to receive a Management Fee calculated at an annual rate of 1% of the aggregate capital contributions of investors. The manager of each SPV may hold back distributions otherwise due to investors in the amount of management fees and expenses payable rather than actually call management fees and expenses from investors. SPVs incur other expenses in addition to management fees and performance-based fees (e.g., operating expenses, accounting expenses, legal fees). These additional expenses are described in the offering and governing documents of the applicable SPV. Details regarding the fees charged to the SPV will be provided in the relevant fund's offering documents.

The information provided in this Brochure regarding fees and expenses is not intended to be complete or final and is qualified in its entirety by the governing documents for each SPV. Investors should read and review the governing documents to fully understand the types of fees and expenses that are paid by each SPV.

#### Investment Advisory Services

Management Fees are generally payable quarterly, in arrears, but Reicon may enter into alternate arrangements (such as billing monthly). Typically, Management Fees are charged as a percentage of assets under management and are calculated at the close of each calendar quarter (or month, if applicable). If management begins after the start of a quarter (or month, if applicable), the fee for the initial quarter shall be calculated on a prorated basis commencing on the day client assets are initially deposited into the investment advisory account managed by Reicon.

*For Client relationships established prior to March 1, 2024:* If additional assets are deposited into or withdrawn from an account after the start of a subsequent quarter, the Management Fee payable to the advisor will not be prorated.

*For Client relationships established after March 1, 2024:* If additional assets are deposited into or withdrawn from an account after the start of a subsequent quarter, the Management Fee will be prorated based on the number of days remaining in the quarter.

Management Fees are individually negotiated with each client. Factors considered in determining the Management Fees charged generally include but are not limited to: the scope of the services being provided; the complexity of the client's portfolio; assets to be placed under management; anticipated future assets; related accounts; portfolio style; account composition; or other special circumstances or requirements. The specific Management Fee schedule for any particular client will be identified in the investment advisory agreement between the client and Reicon.

Reicon offers its Investment Advisory Services through a network of investment adviser representatives that each create a fee schedule for accounts primarily serviced by such investment adviser representative,

which will be provided to clients upon request. While the specific Management Fee schedule for any particular client will be identified in the investment advisory agreement between the client and Reicon, the typical range of fees is between 0.60% and 1.0% depending on the size of the client account, services to be provided, and other factors negotiated between the client and their investment adviser representative.

There is no minimum account size for Investment Advisory Services, but certain accounts may be subject to a minimum annual fee. Reicon may, at its discretion, make exceptions to any of the foregoing or negotiate special fee arrangements where Reicon deems it appropriate under the circumstances. Reicon's Management Fees are subject to change upon not less than 30 days' notice.

Either Reicon or the client may terminate their investment advisory agreement at any time, subject to any written notice requirements in the investment advisory agreement, which typically require 30 days' written notice. In the event of termination, any paid but unearned Management Fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Reicon from the client will be invoiced or deducted from the client's account prior to termination.

#### General Consulting Services

Fees for general consulting services are negotiated on an individual basis and will vary depending upon the specific needs of each client and the complexity of the consulting services. The specific fee charged for these services will be disclosed to the client in advance, and may be a flat fee, an hourly fee, or a fee calculated as a percentage of client assets.

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

Reicon collects performance-based fees from the SPVs in accordance with each of the operating agreements governing those entities. Reicon receives performance-based compensation in the form of Carried Interest from the investors of the SPVs. These fees may create an incentive to make more speculative investments and make different decisions regarding the timing and manner of the realization of such investments, than would be made if such incentive fees were not allocated to Reicon.

Reicon has adopted aggregation and allocation of investments procedures (the "Allocation Procedures") designed to ensure that all of its clients are treated fairly and equally and to prevent the aforementioned conflict from influencing the allocation of investment opportunities among its clients. Reicon will offer clients the right to participate in all investment opportunities that it determines are appropriate for the client in view of relative amounts of capital available for new investments, the investment programs and strategies, and the portfolios of its clients. In accordance with its Allocation Procedures, Reicon will endeavor to treat each of its clients in a fair and equitable manner. The strategies for the SPVs are different than the strategies for managed investment advisory accounts that are traded by Reicon. Currently, the investments held in the account that pays a performance-based fee are not consistent with the investment policies of any other accounts managed by Reicon.

#### **Item 7 – Types of Clients**

Reicon primarily provides discretionary Investment Advisory Services to individuals, high-net-worth individuals, charitable organizations, foundations, other business entities and SPVs.

#### Private Special Purpose Vehicles

Reicon provides discretionary advice to SPVs. Specific procedures and restrictions apply to withdrawals from, and terminations of, an investor's position in SPVs, as described in each SPVs offering materials.

Minimum redemption amounts and minimum capital account size may apply in the event of a partial withdrawal. An investor also may be required to redeem all or part of its interest in a SPV upon provision of reasonable notice, or without such notice if necessary to ensure that the SPVs remains in compliance with applicable law.

For investment in the SPVs, Reicon generally requires a minimum of \$25,000. Reicon reserves the right, in its sole discretion, to reduce the minimum investment requirements under certain circumstances. Nonetheless, this Brochure is designed solely to provide information about Reicon and should not be considered an offer of interests in any SPV.

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

### Methods of Analysis

Reicon's investment process begins with determining the appropriate strategic asset allocation for each client. Asset allocation involves translating the client's circumstances, objectives, and constraints into an appropriate portfolio for achieving the client's goals within the client's tolerance for risk. Asset class targets will be defined by the following asset classes: Equity, including Exchange-Traded Funds, Fixed Income, Mutual Funds, Alternative Investments, and Cash Equivalents. After asset allocation is determined, the next step in our process is determining the specific investments that will be used to implement the targeted allocations.

### Risk of Loss

While Reicon seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Advisory Risks:* There is no guarantee that Reicon's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. In addition, Reicon's methods of analysis may produce sub-optimal results if other methods of analysis (e.g., technical and quantitative) are favored by other investors.

*Business Risks:* There are risks associated with particular industries or particular companies within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates income from a steady stream of customers who buy electricity no matter what the economic environment is like.

*Credit Risks:* Financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management.

*Currency Risks:* Investing in companies domiciled outside of the United States, or U.S. companies with overseas units, involves fluctuations in the value of the dollar against the currency of the foreign country, also referred to as exchange rate risk. Such fluctuations can affect client purchasing power.

*Cybersecurity Risk.* As technology becomes more integrated into Reicon's operations, Reicon will face

greater operational risks through breaches in cybersecurity. A breach in cybersecurity refers to both intentional and unintentional events that may cause Reicon to lose proprietary information, suffer data corruption or lose operational capacity. This in turn could cause Reicon to incur regulatory penalties, reputational damage, additional compliance costs associated with corrective measures and/or financial loss. Cybersecurity threats may result from unauthorized access to Reicon's digital information systems (e.g., through "hacking" or malicious software coding), but may also result from outside attacks such as denial-of-service attacks (i.e., efforts to make network services unavailable to intended users). In addition, because Reicon works closely with third-party service providers (e.g., administrators, transfer agents and custodians), cybersecurity breaches at such third-party service providers may subject Reicon to many of the same risks associated with direct cybersecurity breaches. The same is true for cybersecurity breaches at any of the issuers in which Reicon may invest. While Reicon and their third-party service providers have established information technology and data security programs and have in place business continuity plans and other systems designed to prevent losses and mitigate cybersecurity risk, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified or that cyber-attacks may be highly sophisticated.

*Derivatives Risks.* The use of derivative instruments requires special skills and knowledge of investment techniques that are different than those normally required for purchasing and selling stocks. If Reicon uses a derivative instrument at the wrong time or incorrectly identifies market conditions, or if the derivative instrument does not perform as expected, these strategies may significantly reduce the profits of client accounts. Derivative instruments may be difficult to value, may be illiquid and may be subject to wide swings in valuation caused by changes in the value of the underlying instrument. In addition, the cost of investing in such instruments generally increases as interest rates increase. In addition, investment in futures contracts creates leverage, which can magnify the potential for gain or loss and therefore amplify the effect of market volatility on client accounts. Certain derivatives have the potential for unlimited loss, regardless of the size of the initial investment.

*Economic Conditions.* Changes in economic conditions, including, for example, interest rates, inflation rates, employment conditions, competition, technological developments, political and diplomatic events and trends, and tax laws may adversely affect the business prospects or perceived prospects of companies. While Reicon performs due diligence on the companies in whose securities it invests, economic conditions are not within the control of Reicon, and no assurances can be given that Reicon will anticipate adverse developments.

*Equity Market Risks.* Reicon will generally invest portions of client assets directly into equity investments, primarily stocks, or into Funds that invest in the stock market. As noted above, while Funds have diversified portfolios that may make them less risky than investments in individual securities, Funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Financial Risks:* Excessive borrowing to finance a business' operations increases the risk of profitability because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

*Fixed Income Risks.* Reicon may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in Funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through Funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without

limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity). Reicon may invest portions of client assets into securities that are rated below investment grade (commonly known as “high yield” or “junk bonds”). Securities which are in the lower-grade categories generally offer a higher current yield than is offered by higher-grade securities of similar maturities, but they also generally involve greater risks, such as greater credit risk, greater market risk and volatility, and greater liquidity concerns. These investments are generally considered to be speculative based on the issuer’s capacity or incapacity to pay interest and repay principal.

*Foreign Investing and Emerging Markets Risks:* Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries.

*Inflation Risks:* When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

*Information Risks:* Investment professionals rely on research in order to make conclusions about investment options and select investments. This research is generally a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Particular third-party data, or outside research, is utilized, in part, because of its perceived reliability, but there is no guarantee that the data or research will be completely accurate and Reicon will not seek to independently verify its accuracy. Failure in data accuracy or research may cause Reicon to select investments that perform poorly and fail to help clients meet investment objectives and goals.

*Interest-rate Risks:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

*Lack of Diversification Risk.* Client accounts may not have a diversified portfolio of investments at any given time, and a substantial loss with respect to any particular investment in an undiversified portfolio will have a substantial negative impact on the aggregate value of the portfolio.

*Large-Capitalization Company Risk.* Reicon may invest a portion of a client’s portfolio in large-capitalization companies. Large-capitalization companies are generally more mature and may be unable to respond as quickly as smaller companies to new competitive challenges, such as changes in technology and consumer tastes, and also may not be able to attain the high growth rate of successful smaller companies, especially during extended periods of economic expansion.

*Liquidity Risks:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while directly held real estate properties are not. There is a risk that an investment in an illiquid product may make it harder to liquidate or require liquidating at a lower price due to the lack of readily available buyers.

*Market Risks.* Market risk is the risk that the value of securities in a portfolio may decline due to daily fluctuations in the securities markets that are generally beyond Reicon’s control. In a declining stock market, stock prices for all companies may decline, regardless of their long-term prospects.

*Management Risks.* While Reicon manages client investment portfolios, research, and proprietary methods, including the value of client investment portfolios will change daily based on the performance

of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Reicon allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Reicon's specific investment choices could underperform their relevant indexes. Reicon makes no guarantee regarding the investment performance of any client portfolio. Clients should understand that the investment performance and asset value of the client's portfolio can and will fluctuate and that the portfolio may lose money.

*Options Risks.* Reicon may invest portions of client assets into options, including purchasing or writing put and call options. Investments in options involve risks different from, or possibly greater than, the risks associated with investing directly in securities and other traditional investments. These risks include (i) the risk that the counterparty to a transaction may not fulfill its contractual obligations; (ii) risk of mispricing or improper valuation; and (iii) the risk that changes in the value of the option may not correlate perfectly with the underlying asset, rate, or index. Option prices are highly volatile and may fluctuate substantially during a short period of time. Such prices are influenced by numerous factors that affect the markets, including, but not limited to: changing supply and demand relationships; government programs and policies; national and international political and economic events, changes in interest rates, inflation and deflation and changes in supply and demand relationships. It is possible that certain options might be difficult to purchase or sell, possibly preventing Reicon from executing positions at an advantageous time or price, or possibly requiring them to dispose of other investments at unfavorable times or prices in order to satisfy a portfolio's other obligations.

*Reinvestment Risks:* There is a risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed-income securities.

*Restrictions Risks:* As stated above, clients may place restrictions on the management of their accounts. However, these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

*Risk Related to Alternative Investments.* Alternative investments, such as hedge funds and private equity/venture capital funds, including through special purpose vehicles, are speculative and involve a high degree of risk. There is no secondary market for alternative investments and there may be significant restrictions or limitations on withdrawing from or transferring these types of investments. Private equity funds generally require an investor to make and fund a commitment over several years. Alternative investments generally have higher fees (including both management and performance-based fees) and expenses that offset returns. Alternative investments are generally subject to less regulation than publicly traded investments.

*Risks Related to Alternative Investment Vehicles.* From time to time and as appropriate, Reicon may invest a portion of a client's portfolio in alternative vehicles. The value of client portfolios will be based in part on the value of alternative investment vehicles in which they are invested, the success of each of which will depend heavily upon the efforts of their respective managers. When the investment objectives and strategies of a manager are out of favor in the market or a manager makes unsuccessful investment decisions, the alternative investment vehicles managed by the manager may lose money. A client account may lose a substantial percentage of its value if the investment objectives and strategies of many or most of the alternative investment vehicles in which it is invested are out of favor at the same time, or many or most of the managers make unsuccessful investment decisions at the same time.

*Risks of Investments in ETFs, Mutual Funds and Other Investment Pools.* As described above, Reicon may invest client portfolios in ETFs, mutual funds, and other investment pools. Investments in Funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition,

Funds' success will be related to the skills of their particular managers and their performance in managing their Funds. Registered Funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940, as amended.

*Risks Related to ETF NAV and Market Price.* The market value of an ETF's shares may differ from its net asset value ("NAV"). This difference in price may be due to the fact that the supply and demand in the market for ETF shares at any point in time is not always identical to the supply and demand in the market for the underlying basket of securities. Accordingly, there may be times when an ETF trades at a premium (creating the risk that a portfolio pays more than NAV for an ETF when making a purchase) or discount (creating the risks that the portfolio's value is reduced for undervalued ETFs it holds and that the portfolio receives less than NAV when selling an ETF).

*Small-Capitalization Company Risk.* Reicon may invest a portion of a client's portfolio in small-capitalization companies. Investing in small-capitalization companies involves greater risk than is customarily associated with larger, more established companies. Small-capitalization companies frequently have less management depth and experience, narrower market penetrations, less diverse product lines, less competitive strengths, and fewer resources than larger companies. Due to these and other factors, stocks of small-capitalization companies may be more susceptible to market downturns and other events, and their prices may be more volatile than larger capitalization companies. In addition, in many instances, the securities of small-capitalization companies typically are traded only over the counter or on a regional securities exchange, and the frequency and volume of their trading is substantially less than is typical of larger companies. Because small-capitalization companies normally have fewer shares outstanding than larger companies, it may be more difficult to buy or sell significant amounts of such shares without an unfavorable impact on prevailing prices. Therefore, the securities of small-capitalization companies may be subject to greater price fluctuations. Small-capitalization companies are typically subject to greater changes in earnings and business prospects than larger, more established companies and also may not be widely followed by investors, which can lower the demand for their stock.

*Tax Risks:* Income tax costs may result from the sale of individual securities within a client's account, unless the account is otherwise tax sheltered or tax deferred. Income tax costs directly reduce investment returns. Under the current income tax system, securities held less than one year that are sold at a gain (short term capital gains) are taxed at the client's highest marginal tax rate, and securities held greater than one year that are sold at a gain (long term capital gains) are taxed at a reduced long-term capital gains rate. Furthermore, the potential Alternative Minimum Tax (AMT) impact of long and short-term capital gains incurred in the tax year in question should be considered. Clients are responsible for all tax liabilities arising from the sale of securities within the account.

The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty. In the course of creating and managing a client's investment portfolio, Reicon believes it is important for Reicon's clients to understand and evaluate these risks, as part of their overall approach to setting realistic investment objectives.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Reicon or the integrity of Reicon's management. Reicon has no legal or disciplinary events to report.

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

Neither Reicon, nor any management person of Reicon is registered or has a pending registration with or as a broker/dealer, a futures commission merchant, a commodity pool operator, and/or a commodity trading advisor.

Reicon organizes and sponsors the SPVs and, as such, Reicon will be responsible for all decisions regarding transactions and has full discretion over the management of the SPVs investment activities. The SPVs have fulfilled their investment objective to co-invest alongside unaffiliated private equity firms in a single deal transaction. Various affiliates of Reicon will serve as managing member, general partner or special shareholder (depending on the legal structure used) of the SPVs.

Reid Funston and Theodore Davies serve as Managing Partners and Co-Chief Investment Officers of Reicon Capital, LLC, a private investment management firm. In their roles as Investment Officers, Reid Funston and Theodore Davies, are responsible for finding and managing investments for Reicon Capital, LLC. This relationship creates a conflict of interest in that Mr. Funston and Mr. Davies are providing investment advice to another firm. This is mitigated through different strategies and investment objectives of Reicon Capital, LLC, and Reicon Wealth Advisors.

Reid Funston and Theodore Davies retain an indirect ownership of Maven Capital Partners, LLC (“Maven”), a registered investment advisor with the State of Georgia. This relationship creates a conflict of interest in that Mr. Funston and Mr. Davies are providing investment advice to another firm. Reicon seeks to mitigate this risk by managing accounts in the same manner as its direct accounts.

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

### Code of Ethics and Personal Trading

Reicon has adopted a Code of Ethics (the “Code”), the full text of which is available to you upon request. Reicon’s Code has several goals. First, the Code is designed to assist Reicon in complying with applicable laws and regulations governing its investment advisory business. Under the Advisers Act, Reicon owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires Reicon associated persons to act with honesty, good faith, and fair dealing in working with clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Reicon’s associated persons (managers, officers, and employees). Under the Code’s Professional Standards, Reicon expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Reicon associated persons are not to take inappropriate advantage of their positions in relation to Reicon clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, Reicon’s associated persons may invest in the same securities recommended to clients. This may create a conflict of interest because associated persons of Reicon may invest in securities ahead of or to the exclusion of Reicon clients. Under its Code, Reicon has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

## Participation or Interest in Client Transactions

As outlined above, Reicon has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, Reicon's goal is to place client interests first.

Consistent with the foregoing, Reicon maintains policies regarding participation in initial public offerings ("IPOs") and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If an associated person wishes to participate in an IPO or invest in a private placement, he/she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

If associated persons trade with client accounts (*e.g.*, in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Reicon's written policy.

## **Item 12 – Brokerage Practices**

### Best Execution and Benefits of Brokerage Selection

#### *Private Special Purpose Vehicles*

Reicon purchases private securities on behalf of the SPVs. As a result, Reicon does not anticipate purchasing or selling securities in the SPVs through a broker-dealer.

#### *Investment Advisory Services*

When given discretion to select the brokerage firm that will execute orders in client accounts, Reicon seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Reicon may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third-party research (or any combination) and may be used in servicing any or all of Reicon's clients. Therefore, research services received may not be used for the account for which the particular transaction was affected.

Reicon typically recommends that clients utilize the brokerage and clearing services of Fidelity Brokerage Services, LLC, (a "Custodian"), to maintain custody of clients' assets. Reicon may affect trades for client accounts at a Custodian, or may in some instances, consistent with Reicon's duty of best execution and specific investment advisory agreement with each client, elect to execute trades elsewhere. Although Reicon may recommend that clients establish accounts at a Custodian, it is ultimately the client's decision where to custody assets. Reicon is independently owned and operated and is not affiliated with the Custodians.

Reicon participates in each Custodian's service program, which provides access to institutional trading, custody, reporting, and other services, which are typically not available to retail investors. While there is no direct link between the investment advice Reicon provides and participation in these programs, Reicon receives certain economic benefits from this program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of Reicon's fees from its clients' accounts, and assists with back-office functions, recordkeeping, and client reporting. Many of these

services may be used to service all or a substantial number of Reicon's accounts, including accounts not held at such Custodian. The Custodians may also make available to Reicon other services intended to help Reicon manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, a Custodian may make available, arrange and/or pay for these types of services to be rendered to Reicon by independent third parties. A Custodian may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to Reicon, and/or a Custodian may pay for travel expenses relating to participation in such training. Finally, participation in a Custodian's program provides Reicon with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in a Custodian's program do not necessarily depend upon the proportion of transactions directed to such Custodian. The benefits are received by Reicon, in part because of commission revenue generated for the Custodian by Reicon's clients. This means that the investment activity in client accounts is beneficial to Reicon because the Custodian does not assess a fee to Reicon for these services. This creates an incentive for Reicon to continue to recommend the Custodian to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, Reicon believes that each Custodian provides an excellent combination of these services. These services are not soft dollar arrangements but are part of the institutional platforms offered by each Custodian.

#### Directed Brokerage

Reicon may allow certain clients to direct Reicon to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker; Reicon will not negotiate commissions for directed brokerage. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that Reicon has with the Custodians is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers may in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Reicon to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Reicon that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

## Trade Aggregation Policy

### *Private Special Purpose Vehicles*

Reicon purchases private securities on behalf of the SPVs. As a result, Reicon does not anticipate aggregating the purchase or sale of securities in the SPVs.

### *Investment Advisory Services*

The primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Reicon will execute its transactions through the Custodian as directed by the client. Reicon does not aggregate orders in block trades. Clients may receive differing prices and amounts since trades are not allocated through a block.

### Research and Other Soft Dollars Benefits

As noted above, Reicon receives an economic benefit from the Custodian in the form of support products and services it makes available to Reicon and other independent investment advisers whose clients maintain accounts at such Custodian. These products and services benefit Reicon. Further, Reicon may receive some benefits from a Custodian based on the amount of client assets held at such Custodian.

Consistent with Rule 206-4(3) under the Investment Advisers Act of 1940, as amended, Reicon may, from time to time, enter into solicitation agreements with individuals who solicit potential clients for Reicon. Currently, Reicon does not have any solicitation arrangements.

## **Item 13 – Review of Accounts**

### Private Special Purpose Vehicles

All investments are reviewed by the investment team of each SPV. To each SPV investor, Reicon will send annual audited financial statements within 180 days of the fiscal year end.

### Investment Advisory Services

Managed portfolios are reviewed at least monthly but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Reicon. These factors may include, but are not limited to, change in general client circumstances (e.g., marriage, divorce, retirement) or economic, political or market conditions. One of Reicon's Investment Adviser Representatives ("IARs") or principals is responsible for reviewing all accounts.

For those clients to whom Reicon provides separate or consulting services, reviews are conducted on an as-needed or agreed-upon basis. Such reviews are conducted by one of Reicon's principals.

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

### Third-Party Benefits

As noted above, Reicon receives an economic benefit from the Custodians in the form of support products and services it makes available to Reicon and other independent investment advisers whose clients maintain accounts at such Custodian. These products and services benefit Reicon. Further, Reicon may

receive some benefits from a Custodian based on the amount of client assets held at such Custodian. Please see ***Item 12 - Brokerage Practices*** for more information.

#### Compensated Referrals

Currently, Reicon does not have any solicitation arrangements.

### **Item 15 – Custody**

#### Private Special Purpose Vehicles

Regarding the SPVs, Reicon is deemed to have custody of client assets due to serving as general partner to limited liability companies. Reicon intends to comply with Rule 206(4)-2 under the Adviser's Act (the "Custody Rule") by meeting the conditions of the pooled vehicle annual audit provision.

#### Investment Advisory Services

Client funds and securities will be maintained by unaffiliated qualified custodians; banks, broker/dealers, mutual fund company, or transfer agent; not with or by Reicon or any of its associates. Clients should receive at least quarterly statements from the qualified custodian that holds and maintains the client's investment assets. Clients should not hesitate to contact us if there are any questions about their statements.

### **Item 16 – Investment Discretion**

#### Private Special Purpose Vehicles

Reicon has been retained to provide management, advisory, and related services to the SPVs on a discretionary basis. Reicon's investment decisions and advice with respect to the SPVs is subject to the investment objectives of each SPV and guidelines, as set forth in the applicable governing documents.

#### Investment Advisory Services

As described in ***Item 4 - Advisory Business***, Reicon will accept clients on a discretionary basis.

The client's investment advisory agreement gives Reicon the authority to carry out various activities in the account, generally including the following: (i) trade execution; (ii) the ability to request checks on behalf of the client; and (iii) the withdrawal of advisory fees directly from the account. Reicon then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of this authority to the extent consistent with the client's investment advisory agreement with Reicon and the requirements of the client's custodian.

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

#### Private Special Purpose Vehicles

Reicon does not expect to receive proxies for investments held in the SPVs. However, should matters arise in which Reicon does receive a proxy, Reicon will vote each proxy in accordance with its fiduciary duty to the SPV. Reicon will generally seek to vote proxies in a way that maximizes the value of the SPV's assets as determined by Reicon in good faith. The SPV's investment team will coordinate the proxy voting process.

### Investment Advisory Services

As a policy and in accordance with Reicon's investment advisory agreement, Reicon does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. While clients may contact Reicon with questions relating to proxy procedures and proposals, Reicon generally does not research particular proxy proposals.

### **Item 18 – Financial Information**

Because Reicon does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and currently does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients, Reicon has nothing to disclose under this Item 18.

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

## **Item 1- Cover Page**

### **Reid T. Funston**

CRD#: 2319236

Reicon Wealth Advisors, LLC  
3166 Mathieson Dr NE, Suite 200  
Atlanta, GA 30305  
Phone: (404) 328-2120

March 5, 2024

This Brochure Supplement provides information about Reid T. Funston, which supplements the Reicon Wealth Advisors, LLC's Brochure. You should have received a copy of that Brochure. Please contact Reid Funston at (404) 328-2120 if you did not receive Reicon Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Reid T. Funston is available on the SEC's website at [www.adviserinfo.gov](http://www.adviserinfo.gov).

## **Item 2 – Educational Background and Business Experience**

Reid T. Funston (year of birth 1963) serves as Managing Partner and Chief Compliance Officer of Reicon Wealth Advisors, LLC.

Mr. Funston earned a B.A. in Economics graduating Cum Laude with Honors from Sewanee: The University of the South in 1986 and a M.B.A. in Finance from University of Chicago Booth School of Business in 1992.

Concurrently, Mr. Funston serves as Managing Partner and Co-Chief Investment Officer at Reicon Capital, LLC (February 2000 – Present) and has a non-controlling indirect interest in Maven Capital Partners, LLC (July 2022 – Present). Previously, Mr. Funston served as a Director of High Yield and Leveraged Finance at FleetBoston Robertson Stephens, Inc. (May 1997 – January 2000). Before that, he served as a Vice President of Leveraged Finance at Banc of America Securities (June 1992 - May 1997) and a Portfolio Manager at SunTrust Banks/Trusco Capital Management (June 1986 – August 1990).

## **Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to Mr. Funston.

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

Mr. Funston retains a non-controlling indirect interest in Maven Capital Partners, LLC.

Mr. Funston serves as Managing Partner and Co-Chief Investment Officer for Reicon Capital, LLC. Mr. Funston spends approximately fifty percent of his time within this role and is responsible for finding and reviewing public and private investment opportunities. Mr. Funston receives compensation from Reicon Capital, LLC, in the form of a salary for providing ongoing advisory services to Reicon Capital, LLC. Services provided to Reicon Capital, LLC do not conflict with Reicon Wealth Advisors due to the differences in strategy and investment objectives.

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

Mr. Funston does not receive an economic benefit for providing services to someone who is not a client of Reicon Wealth Advisors, LLC or Maven Capital Partners, LLC.

#### **Item 6 – Supervision**

Mr. Funston is a principal of Reicon Wealth Advisors, LLC. He can be reached at (404) 328-2120.

## **Item 1- Cover Page**

### **Theodore J. Davies**

CRD#: 2389710

Reicon Wealth Advisors, LLC  
3166 Mathieson Dr NE, Suite 200  
Atlanta, GA 30305  
Phone: (404) 328-2120

March 5, 2024

This Brochure Supplement provides information about Theodore J. Davies, which supplements the Reicon Wealth Advisors, LLC's Brochure. You should have received a copy of that Brochure. Please contact Reid Funston at (404) 328-2120 if you did not receive Reicon Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Theodore J. Davies is available on the SEC's website at [www.adviserinfo.gov](http://www.adviserinfo.gov).

## **Item 2 – Educational Background and Business Experience**

Theodore J. Davies (year of birth 1964) serves as Managing Partner of Reicon Wealth Advisors, LLC.

Mr. Davies earned a B.A. in Economics from Duke University in 1986 and a M.B.A. in Finance from Columbia Business School in 1993.

Concurrently, Mr. Davies serves as Managing Partner and Co - Chief Investment Officer at Reicon Capital, LLC (March 2000 – Present) and non-controlling indirect interest in Maven Capital Partners, LLC (July 2022 – Present). Previously, Mr. Davies served as Director of Leveraged Finance at FleetBoston Robertson Stephens, Inc. (May 1998 - February 2000). Before that, he served as Vice President of Leveraged Finance at Lehman Brothers (May 1996 - May 1998) and Associate of Leveraged Finance at Merrill Lynch (May 1993 - May 1996). Mr. Davies served as an officer in the US Navy from 1986-1991.

## **Item 3 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to Mr. Davies.

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

Mr. Davies retains a non-controlling indirect interest in Maven Capital Partners, LLC.

Mr. Davies serves as Managing Partner and Co-Chief Investment Officer for Reicon Capital, LLC. Mr. Davies spends fifty percent of his time within this role and is responsible for finding and reviewing public and private investment opportunities. Mr. Davies receives compensation from Reicon Capital, LLC, in the form of a salary for providing ongoing advisory services to Reicon Capital, LLC. Services provided to Reicon Capital, LLC do not conflict with Reicon Wealth Advisors due to the differences in strategy and investment objectives.

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

Mr. Davies does not receive an economic benefit for providing services to someone who is not a client of Reicon Wealth Advisors, LLC or Maven Capital Partners, LLC.

#### **Item 6 – Supervision**

Mr. Davies is a principal of Reicon Wealth Advisors, LLC. He can be reached at (404) 228-9178.

## **Item 1- Cover Page**

### **Stephanie B. Douglass**

CRD#: 3119098

Reicon Wealth Advisors, LLC  
3166 Mathieson Dr NE, Suite 200  
Atlanta, GA 30305  
Phone: (404) 328-2120

March 5, 2024

This Brochure Supplement provides information about Stephanie B. Douglass, which supplements the Reicon Wealth Advisors, LLC's Brochure. You should have received a copy of that Brochure. Please contact Reid Funston at (404) 328-2120 if you did not receive Reicon Wealth Advisors, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephanie B. Douglass is available on the SEC's website at [www.adviserinfo.gov](http://www.adviserinfo.gov).

## **Item 2 – Educational Background and Business Experience**

Stephanie B. Douglass (year of birth 1976) serves as Managing Director of Reicon Wealth Advisors, LLC.

Mrs. Douglass earned a B.S. in Business Administration with a concentration in Finance from Boston University's School of Management in 1998.

Concurrently, Mrs. Douglass serves as Managing Director at Reicon Capital, LLC (May 2001 – Present) and Managing Director of Alternatives at Maven Capital Partners, LLC (July 2022 – Present). Previously, Mrs. Douglass served as a Private Equity Associate at Citicorp Venture Capital, LTD (February 2000 – May 2001). Before that, she served as a High Yield Financial Analyst at BancBoston Robertson Stephens Inc. (August 1998 – February 2000).

Mrs. Douglass is a CFA® charter holder and holds the Chartered Alternative Investment Analyst designation.

The Chartered Financial Analyst (CFA®) is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. A candidate for the designation must meet the following requirements: either a bachelor's degree from an accredited college or university or four years of full-time work experience or a combination of professional work experience and higher education totaling 4,000 hours; completion of a comprehensive self-study program; successful passing of three levels of examinations.

The Chartered Alternative Investment Analyst (CAIA®) is a professional designation granted by the Chartered Alternative Investment Analyst Association to candidates who have completed Level I and Level II examinations. A candidate for the designation must meet the following requirements: minimum education and experience requirements and must pass a two-level curriculum that includes topics in the area of alternative investments ranging from qualitative analysis and trading theories of alternative investments to indexation and benchmarking. The alternative investments that a Chartered Alternative Investment Analyst is trained to assess include hedge funds, venture capital, private equity, funds of funds, derivatives, and real estate investments.

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to Mrs. Douglass.

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

Mrs. Douglass serves as Managing Director for Maven Capital Partners, LLC.

Mrs. Douglass serves as Managing Director for Reicon Capital, LLC. Mrs. Douglass spends fifty percent of her time within this role and is responsible for managing the alternative investment portfolio. Mrs. Douglass receives compensation from Reicon Capital, LLC, in the form of a salary for providing ongoing services to Reicon Capital, LLC. Services provided to Reicon Capital, LLC do not conflict with Reicon Wealth Advisors due to the differences in strategy and investment objectives.

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

Mrs. Douglass does not receive an economic benefit for providing services to someone who is not a client of Reicon Wealth Advisors, LLC or Maven Capital Partners, LLC.

### **Item 6 – Supervision**

Mrs. Douglass is a principal of Reicon Wealth Advisors, LLC. She can be reached at (678) 427-0801.