

EntreWealth, LLC  
Form ADV Part 2A  
Disclosure Brochure  
March 14, 2024

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

This brochure provides information about the qualifications and business practices of EntreWealth, LLC. If you have any questions about the contents of this brochure, please contact us at (512) 240-2244 or by email at [jeff@jeffsocha.com](mailto:jeff@jeffsocha.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about EntreWealth, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration as an investment advisor does not imply a certain level of skill or training.

**CRD Number:** 317553.

## Item 2: Material Changes

Since our last brochure dated August 18, 2023, we have no material changes to report.

## Item 3: Table of Contents

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 .....	6
Item 7: Types of Clients .....	6
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss .....	6
Item 9: Disciplinary Information .....	8
Item 10: Other Financial Industry Activities and Affiliations.....	8
Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading.....	9
Item 12: Brokerage Practices .....	10
Item 13: Review of Accounts .....	10
Item 14: Client Referrals and Other Compensation .....	11
Item 15: Custody .....	11
Item 16: Investment Discretion .....	11
Item 17: Voting Client Securities .....	11
Item 18: Financial Information .....	11
Privacy Notice.....	12

## Item 4: Advisory Business

### Description of Advisory Firm

EntreWealth, LLC ("Entre") is a Limited Liability Company and SEC-registered investment adviser in Texas. The firm was formed in October 2021 and managed and primarily owned by Jeffrey Socha.

### Types of Advisory Services

#### Portfolio Management Services

Entre offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Entre creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Entre evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Entre will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Through this discretionary authority, Entre will select other advisors (sub-advisors) to manage all or a portion of the client's assets.

#### Financial Planning

Financial plans and financial planning are included within the portfolio management services and may include but are not limited to investment planning, tax concerns, retirement planning, college planning, and debt/credit planning. Entre also offers these financial planning services as a stand-alone service.

#### Other Investment Advisors

Entre has a strategic alliance with Vital Wealth, an unaffiliated third-party investment adviser. On occasion, supervised persons of Vital Wealth may meet with clients of Entre to assist Entre clients' questions regarding their portfolio and the market. Clients of Entre will maintain their contractual relationship with Entre and there will be no additional fees as a result of this strategic alliance.

### Client Tailored Services and Client Imposed Restrictions

Entre offers the same suite of services to all its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Entre from properly servicing the client account, or if the restrictions would require Entre to deviate from its standard suite of services, Entre reserves the right to end the relationship.

## Wrap Fee Programs

Entre does not participate in any wrap fee programs.

## Assets under Management

As of **December 31, 2023**, Entre has \$ \$170,618,396 in discretionary and \$ \$4,034,142 in non-discretionary assets under management.

## Item 5: Fees and Compensation

### Portfolio Management and Financial Planning Fees

Assets under Management	Fee Rate
Up to \$1,000,000	1.50%
Next \$1,000,001 to \$2,000,000	1.00%
Next \$2,000,001 to \$3,000,000	0.75%
Over \$3,000,001	0.50%

The fees for Portfolio Management and Financial Planning Services are negotiable and depend upon the needs of the client and complexity of the situation. The final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in advance and clients may terminate their contracts with thirty days' written notice. The billing period is determined in the contract between Entre and the client.

Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract and within thirty days written notice. Upon termination, any fees paid in advance will be refunded pro-rata from the date of notification. Advisory fees are withdrawn directly from the client's account. In cases where advisory fees are directly deducted, Entre is required to obtain client authorization and disclose that the custodian will send statements on at least a quarterly basis to the client wherein Entre fees are itemized.

Entre uses the value of the account as of the last business day of the billing period, after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

### Selection of Other Advisors

Entre may, on occasion, recommend that all or a portion of the assets in the account be managed by an outside investment manager or sub-advisor. Clients will pay the Management Fee directly to Entre of which a portion will be allocated to the outside investment manager and/or sub-advisor. Unless the client directs otherwise, Entre is authorized to use its discretion in selecting or changing a sub-advisor and/or outside money manager to the account without prior approval from the Client. Clients may be required to execute a limited power of attorney with a sub-advisor and/or outside investment manager selected by Entre.

### Client Responsibility for Other Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Entre. Please see Item 12 of this brochure regarding broker-dealers and custodians.

## Outside Compensation for the Sale of Securities to Clients

Entre and its supervised persons do not accept compensation for the sale of investment products to its clients.

## Item 6: Performance-Based Fees and Side-By-Side Management

Entre does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

Entre will provides advisory services to individuals, high net worth individuals, and pension and profit-sharing plans.

There is no account minimum for any of Entre's services.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### Methods of Analysis

Entre's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis, and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. Entre uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

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

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market data, primarily price and volume.

### Investment Strategies

Entre uses long-term trading.

### Risks of Investing

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

**Charting analysis** strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other

methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

The value of an investment may be affected by one or more of the following risks, any of which could cause the portfolio's return or yield to fluctuate:

**Availability of Information:** Certain issuers, including municipalities, private companies, and foreign issuers may not be subject to the same disclosure, accounting, auditing, and financial reporting standards and practices as publicly listed companies in U.S. stock markets. As such, there may be less information publicly available about these issuers and their current financial condition.

**Credit Risk:** An issuer of debt securities may fail to make interest payments and repay principal when due, in whole or in part. Changes in an issuer's financial strength or in a security's credit rating may affect a security's value.

**Inflation Risk:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

**Interest Rate Risk:** Changes in interest rates may affect the value of a portfolio's investments. For example, when interest rates rise, the value of investments in fixed income securities tends to fall below par value or the principal investment and when interest rates fall, the value of the investments in fixed income securities tends to rise. In general, fixed income securities with longer maturities are more sensitive to these price changes.

**Market Risk:** The value of an investment may decline based on market conditions, regardless of the issuer's operational success or its financial condition. As such, the value of a portfolio's assets may fluctuate as the stock or bond market fluctuates.

**Prepayment or Call Risk:** Many fixed income securities contain a provision that allows the issuer to "call", or redeem, all or part of the issue prior to the maturity date of the security. There is no guarantee that investors will be able to reinvest the proceeds in a security of equivalent quality or yield characteristics.

**Style Risk:** The value of a portfolio may fluctuate based on the investment style employed in the management of the portfolio. The risk of value investing includes that the price of a security may not

approach its anticipated value or may decline in value. The risk of growth investing includes that the anticipated underlying earnings or operational growth may not occur, or the market price of the security may decline in value.

**Trading Practices:** Brokerage commissions and other fees may be higher in certain markets or for foreign securities due to lack of established government supervision and regulation of foreign securities markets, currency markets, trading systems, and brokerage practices. Procedures and rules governing foreign transactions and custody also may involve delays in payment, delivery, or recovery of money or investments.

Risks of specific securities used:

**Corporate Bonds:** Corporate bonds may incur greater risk than government bonds, as corporate bonds are generally financed by a business or corporation and may be subject to loss of part or total value in the event of an issuer's bankruptcy or restructuring.

**Equity Securities:** While equity securities outperform other types of investments at certain times, individual stock prices may go up and down more dramatically. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Exchange Traded Funds:** Investing in an exchange traded fund ("ETF") often involves the same risks as investing in the underlying securities the ETF is tracking. ETF prices may vary significantly from the Net Asset Value due to market conditions. Certain exchange traded funds, such as inverse funds, may not track underlying benchmarks as expected.

**Municipal/Government bonds:** Debt securities issued by a municipality or other government entity are susceptible to events relating directly to the issuer or security, including economic, legal, or political policy changes, tax base erosion, state constitutional limits on tax increases, budget deficits and other financial difficulties, and changes in the credit rating assigned to municipal issues.

**Mutual Funds:** Investments in mutual funds generally involve the same risks as investing in underlying equity or fixed income securities. Additionally, as a pooled investment vehicle, mutual funds subject investors to other investors' investment decisions and capital gains are spread evenly among all investors. Mutual fund prices may vary significantly from the Net Asset Value due to market conditions.

## Item 9: Disciplinary Information

There is no disciplinary activity to report.

## Item 10: Other Financial Industry Activities and Affiliations

Neither Entre nor its representatives are registered as or have pending applications to become a:

- Broker-dealer or representative of a broker-dealer.
- Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor, or an associated person of the foregoing entities.



## Relationships Material to this Advisory Business & Possible Conflicts of Interest

### Socha Consulting

Socha Consulting is a business consulting entity affiliated with Entre. Representatives of Entre may offer clients advice or products from Socha Consulting that may present a conflict of interest due to the financial interest. Clients will pay fees separate and distinct for services rendered under Socha Consulting. Consulting services at Socha Consulting may include tax planning, family office services, and business planning.

### Socha Capital Energy Fund 2023 Management, LLC

Jeffrey Socha owns Socha Capital Energy Fund 2023 Management, LLC ("Socha Fund"), an exempt reporting advisor that manages a pooled investment vehicle. To minimize any conflict of interest created by Jeffrey Socha's ownership in this entity, clients will be recommended to invest in the pooled investment vehicle when it is in their best interest. Clients are never required to invest in the Socha Fund.

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

### Code of Ethics

Entre has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Entre's Code of Ethics is available free upon request to any client or prospective client.

### Recommendations Involving Material Financial Interests

Entre does not recommend that clients buy or sell any security in which a related person to Entre or Entre has a material financial interest.

### Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Entre may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Entre to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Entre will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Entre may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Entre to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however,

Entre will never engage in trading that operates to the client's disadvantage if representatives of Entre buy or sell securities at or around the same time as clients.

## Item 12: Brokerage Practices

### Broker Selection and Best Execution

Broker-dealers will be recommended based on Entre's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Entre may also consider the market expertise and research access provided by the broker-dealer, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Entre's research efforts. Entre will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer.

Entre will recommend that clients custody their account with Schwab Institutional, a division of Charles Schwab & Co., Inc ("Schwab").

### Research and Other Soft Dollar Benefits

While Entre has no formal soft dollar program in which soft dollars are used to pay for third party services, Entre may receive research, products, or other services from Schwab, however they are not in connection with client securities transactions.

### Brokerage for Client Referrals

Entre receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### Directed Brokerage

Entre will require clients to use Schwab to execute transactions.

### Aggregated Trades

If Entre buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Entre would place an aggregate order with the broker on behalf of all such clients to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Entre would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## Item 13: Review of Accounts

All client accounts for Entre's advisory services provided on an ongoing basis are reviewed at least annually by Jeff Socha, President, regarding clients' respective investment policies and risk tolerance levels.

## Factors That May Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

## Reports

Clients will receive their reports directly from the custodial firm. Entre will not provide additional reports.

## Item 14: Client Referrals and Other Compensation

Although not currently, Entre may establish relationships in the future to pay compensation to a third-party for recommended clients to Entre. In the even such arrangements are established, Client will be informed of the fees and conflicts through disclosure.

## Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Entre will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive monthly statements directly from the custodian and should carefully review those statements for accuracy.

## Item 16: Investment Discretion

Entre provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Entre generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. For clients whose accounts are managed on a non-discretionary basis, Entre obtains client permission prior to executing a transaction.

## Item 17: Voting Client Securities

Entre will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18: Financial Information

Entre neither requires nor solicits prepayment of more than \$1200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Neither Entre nor its management has any financial condition that is likely to reasonably impair Entre's ability to meet contractual commitments to clients.

Entre has not been the subject of a bankruptcy petition in the last ten years.

# Privacy Notice

2024

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, disclose, and protect your personal information. EntreWealth, LLC (“Entre”) is committed to maintaining the privacy of our clients and former clients as set forth below.

## **Personal Information We Collect:**

- Social security number and/or tax id number
- Wire Instructions
- Name and Address

## **Personal Information We Disclose:**

Entre does not disclose or sell information about our current or former clients to any third parties, except in the following circumstances:

- To companies that are necessary in to service your account.
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Entre, or as otherwise required by law.

## **How we protect your personal information:**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

If you have any questions about this notice or our privacy policies, please contact us at (512) 240-2244.