



DISCLOSURE BROCHURE

FORM ADV PART 2A

ATLAS INVESTMENT ADVISORS

11720 Amber Park Drive, #160, Alpharetta, GA 30009
(770) 336-6805
www.invest-atlas.com

March 4, 2024

Item 1 – Cover Page

This Disclosure Brochure provides information about the qualifications and business practices of ATLAS Financial Planning, LLC, doing business as ATLAS Investment Advisors. If you have any questions about the contents of this brochure, please contact us at (770) 336-6805. 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.

ATLAS Investment Advisors is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about ATLAS Investment Advisors is also available on the SEC's website at www.adviserinfo.sec.gov by conducting a Firm search using our CRD No. 324861.

Item 2 – Material Changes

We will promptly update this Disclosure Brochure when material changes occur. Material changes are summarized in this section.

We initially provide you with a copy of our Disclosure Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our brochure.

Since our initial brochure dated June 1, 2023, we have made the following material changes:

- We merged with the business of Berger Wealth Management, LLC, and are now providing advisory services to the former clients of that firm.
- Because our total assets under management exceed \$100 million, we have applied for registration with the United States Securities and Exchange Commission.

You may request a current copy of our Disclosure Brochure at any time by contacting us at (770) 336-6805. You may also obtain a copy of our current Disclosure Brochure at www.adviserinfo.sec.gov by conducting a Firm search using our CRD No. 324861.

Item 3 – Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	5
Firm Overview	5
Services	5
Portfolio Management Services.....	5
Financial Planning	6
Types of Investments	8
Client-Tailored Advisory Services	8
Wrap Fee Program	8
Assets Under Management.....	9
Item 5 – Fees and Compensation	9
Portfolio Management Services.....	9
Financial Planning Services.....	10
Project-Based Financial Plan	10
Other Types of Fees and Expenses.....	11
Item 6 – Performance-Based Fees and Side-By-Side Management	11
Item 7 – Types of Clients	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Methods of Analysis.....	11
Investment Strategies	12
Recommend Certain Types of Investments	13
Risk of Loss	14
General Risks.....	14
Investment-Specific Risks.....	14
Item 9 – Disciplinary Information	15
Item 10 – Other Financial Industry Activities and Affiliations	15
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	16
Code of Ethics.....	16
Participation or Interest in Client Transactions.....	16
Personal Trading.....	16

Item 12 – Brokerage Practices	17
Best Execution	18
Brokerage for Client Referrals	18
Order Aggregation	18
Investment Opportunity Allocation	18
Item 13 - Review of Accounts	19
Item 14 - Client Referrals and Other Compensation	19
Item 15 – Custody	19
Item 16 – Investment Discretion	19
Item 17 – Voting Client Securities	20
Item 18 – Financial Information	20
Item 19 – Requirements for State Registered Advisers	20
Principal Officers	20
Other Conflicts of Interest	20
Performance-Based Fees	20
Disciplinary Disclosures	20
Privacy Policy	20
Why We Collect Your Information	21
What Information We Collect and Maintain	21
What Information We Disclose	21
How We Protect Your Personal Information	21
Former Clients	21
Contact Us	21
Business Continuity Plan	22

Item 4 – Advisory Business

Firm Overview

ATLAS Financial Planning, LLC is a limited liability company (LLC) formed in 2020 under the laws of the State of Georgia, doing business under the trade name of ATLAS Investment Advisors. ATLAS Investment Advisors became registered as a registered investment adviser in the State of Georgia in June 2023, and has applied for registration with the United States Securities and Exchange Commission in March 2024. George Christian Mauser, CIMA®, CFP®, CRPC®, CRC and Rebecca O. Richardson, CFP® are the Managing Members of our firm. The experience, education, and qualifications of the principals can be found in the accompanying Brochure Supplement.

Services

We tailor our advisory services to the individual needs of our clients. We offer portfolio management services, and financial planning services. Each of these is described in more detail below. Before receiving any advisory services, you will need to sign a written agreement that details the exact terms of service. We do not provide advisory services without an advisory agreement. All advisory services are provided to you by a qualified individual who is registered as an Investment Adviser Representative of our firm.

Portfolio Management Services

Our Portfolio Management Services provide continuous and ongoing management of your investment portfolio, based on your individual needs and investment objectives. Your investment portfolio includes your brokerage accounts held by a qualified custodian for which you have appointed us as your investment adviser of record.

Through personal discussions and review of your personal financial circumstances, we determine your individual objectives, time horizon, risk tolerance, and liquidity needs. With this information, we help you define your financial goals and investment objectives. We then develop a personal investment strategy for you that includes an asset allocation target. We will create and manage your investment portfolio based on your strategy and allocation target. When applicable, tax consequences are also considered.

We establish your investment strategy based on the information you provide to us. Inaccurate or incomplete information may result in an inappropriate investment portfolio. Past performance is no indication of future performance, and we cannot offer any guarantees or promises that your goals and objectives will be met. Changes to your personal financial circumstances, goals, or objectives may cause your investment strategy to become inaccurate and out of date. We recommend you notify us promptly of any changes so your investment portfolio can be updated, if necessary.

You may choose to have us provide our investment management services on either a discretionary basis or a non-discretionary basis.

- Discretionary management means we are not required to give you advance notice or to seek your consent for any changes to your portfolio. You grant us discretionary authority to buy and sell securities in your accounts. This authority is established and agreed upon in the Portfolio Management Agreement. With this authority we can transact securities without obtaining approval or consent from you prior to effecting the transaction. However, these transactions are made in accordance with the investment strategy we have established with you. Discretionary management allows us to manage your portfolio more efficiently.

- Non-discretionary management means that we will consult with you regarding any changes we recommend for your portfolio, and obtain your approval prior to effecting any transactions in your account. With non-discretionary management, if we are unable to contact you to obtain your approval, it may cause delays in implementing our recommendations.

Although you retain ownership and control over your investment account, we ask that you refrain from conducting transactions in the account without first notifying us. Please coordinate with us on any anticipated deposits or withdrawals so we can ensure your investment strategy is maintained.

Financial Planning

Our Financial Planning Services involve an evaluation of your current financial circumstances and future projections by using currently known variables to predict future cash flows, asset values, and withdrawal plans. We will guide you through a process to establish your goals and values around money. You will be required to provide information as necessary to help us analyze your current financial situation, desired goals, and anticipated future needs. You will receive a written or an electronic report, providing you with a detailed financial plan designed to achieve your stated financial goals and objectives. We will provide analysis and recommendations regarding specific topics, which may include any or all of the following, depending on your specific needs:

- *Cash Flow and Debt Management.* We will provide advice on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- *Financial Goals.* We will help you identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- *Business Planning.* We can provide consulting services if you currently operate your own business, are considering starting a business, or are planning for an exit from your current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- *Retirement Planning.* Our retirement planning services typically include projections of your likelihood of achieving your financial goals, focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- *Investment Analysis.* This may involve developing an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- *Employee Benefits Optimization.* We will provide a review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- *Risk Management.* A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks, and about weighing the costs of purchasing insurance versus the benefits of doing so

and, likewise, the potential cost of not purchasing insurance ("self-insuring"). We will review your existing insurance policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- *College Savings.* We can assist with projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children or grandchildren (if appropriate).
- *Estate Planning.* This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. Please note we do not provide legal advice. We always recommend you consult with a qualified attorney when you initiate, update, or complete estate planning activities. If you wish to hire an attorney for such purposes, we may be able to provide you with contact information for attorneys who specialize in estate planning, based on our knowledge or research of the credentials of such attorneys. When we provide contact information, we do so only as a convenience to you, and it should not be viewed as a recommendation or endorsement. You are encouraged to perform your own due diligence when hiring professionals. We do not receive referral fees for providing contact information. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- *Tax Planning Strategies.* Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. Please note we do not provide tax advice. We recommend you consult with a qualified tax professional before initiating any tax planning strategy. If you wish to hire a tax professional, we may be able to provide you with contact information for tax professionals based on our knowledge or research of the credentials of such tax professionals. When we provide contact information, we do so only as a convenience to you, and it should not be viewed as a recommendation or endorsement. You are encouraged to perform your own due diligence when hiring professionals. We do not receive referral fees for providing contact information. We will participate in meetings or phone calls between you and your tax professional with your approval.

We base our financial plans on the information you provide to us. Inaccurate or incomplete information may result in an inaccurate or incomplete financial plan. To create a financial plan, we must make certain assumptions with respect to interest and inflation rates, past trends, and future projections of the performance of the market and economy. Past performance is no indication of future performance, and we cannot offer any guarantees or promises that your goals and objectives will be met. Changes to your personal financial circumstances, goals, or objectives may cause your financial plan to become inaccurate and out of date. We recommend you notify us promptly of any changes so your plan can be updated.

Clients who engage our Portfolio Management Services receive our Financial Planning Services on an ongoing basis for no additional fee. We use the information provided by you in the financial planning process to formulate our investment recommendations for your investment portfolio. As your financial circumstances change, we will work with you to update your financial plan as needed, and adjust your investment portfolio as necessary.

Financial Planning Services are provided on a non-discretionary basis. This means you have the option to implement any of the recommendations made in the financial plan. You are not obligated to implement any financial planning recommendations made by us. Although the financial plan may consider your tax situation or estate plan, we do not provide tax or legal advice. We recommend you work closely with your attorney, accountant, or other investment

professionals in implementing your plan. We are happy to work with your professionals to coordinate your financial plan with your estate planning and tax planning.

Project-Based Financial Plan. Clients who do not receive our Portfolio Management Services may engage our Financial Planning Services on a project basis for a one-time financial plan. You will receive a written or an electronic report, providing you with a detailed financial plan designed to achieve your stated financial goals and objectives. We will provide analysis and recommendations regarding specific topics, which may include any or all of the topics described above, depending on your specific needs. For Project-Based Financial Plans, we do not provide ongoing review or updates of your financial plan. Individuals who engage us for a Project-Based Financial Plan may implement any investment recommendations on your own. We do not have any control over the timing or accuracy of any transactions executed by you.

Types of Investments

We generally employ long-term buy-and-hold passive investment strategies, and do not engage in market timing. Clients may impose reasonable restrictions on investing in certain types of securities.

We typically will recommend mutual funds, exchange-traded funds (ETFs), stocks and bonds for our clients' investment portfolios, but may also recommend other types of investments when appropriate based on a client's circumstances. See Item 8 for additional information on our portfolio management practices.

Client-Tailored Advisory Services

We tailor our advisory services to your individual needs. We will conduct an initial interview and data gathering process to determine your financial situation and investment objectives. We provide our advisory services consistent with your investment objectives and with our fiduciary duty to you.

You may request reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We will make a reasonable attempt to honor any reasonable restrictions you request, but in the case of pooled investment vehicles such as mutual funds or ETFs where underlying holdings change frequently, we cannot guarantee restrictions will always be enforced. In addition, such restrictions may cause us to deviate from the investment decisions we would otherwise make in managing your account. In some cases, we may not be able to accommodate restrictions if they do not allow us to manage your portfolio in a prudent manner. You may also impose reasonable restrictions upon certain securities or types of securities in your account.

We will contact or attempt to contact you annually to confirm if there have been any changes in your financial situation or investment objectives, or determine if you wish to impose or modify account restrictions.

Because our advisory services are based on your specific financial circumstances, you are urged to promptly notify us any time you experience changes to your financial circumstances, so we can determine if any changes to your investment strategy or our recommendations are necessary.

Wrap Fee Program

We do not participate in a wrap fee program.

Assets Under Management

As of December 31, 2023, we had \$73,685,849 in assets managed on a discretionary basis and \$27,021,879 in assets managed on a non-discretionary basis. This section will be updated on at least an annual basis to reflect our assets under management as of December 31 of each year, or more frequently if material changes occur with regard to the assets we manage.

Item 5 – Fees and Compensation

We believe our fees are reasonable for the services provided and in relation to fees charged by other advisers offering similar services. However, our fees may be higher or lower than fees charged by other advisers offering similar services.

Please note, unless you have received our Disclosure Brochure at least 48 hours prior to signing an advisory agreement, you may terminate the advisory agreement within five (5) business days of signing the agreement without incurring any penalties and advisory fees. We reserve the right to offer discounts or to waive fees at our sole discretion.

How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below. Fees may be negotiable based on factors such as the complexity of your financial situation or total assets under management. Legacy clients and former clients of Berger Wealth Management may have different fee arrangements. Therefore, some clients may pay different fees than the fee schedule shown below, including a fixed fee in some limited cases. Your exact fee and other terms will be outlined in the advisory agreement you sign.

Portfolio Management Services

Our standard advisory fee is based on a percentage of your assets under management, paid quarterly and in advance, according to the schedule below.

Assets Under Management	Annual Fee
First \$2,000,000	1.00%
\$2,000,001 and Above	0.50%

This is a blended fee schedule. This means the assets in your investment portfolio will be billed at different levels according to the fee schedule above. For example, if your account value is \$4,000,000, then the fee calculation would be as follows: $(\$2,000,000 \times 1.00\%) + (\$2,000,000 \times 0.50\%) = \$20,000 + \$10,000 = \$30,000$ per year, billed quarterly at \$7,500 per quarter. ***This example is provided for illustration only. Fees are based on your portfolio balance and thus will fluctuate as your portfolio balance changes.***

Your fee will be deducted from your brokerage account and paid directly to us by the qualified custodian that holds your account. You will authorize the qualified custodian to deduct fees from your account and pay them to us. We are responsible for calculating the fee and delivering instructions to the custodian. At the same time, we will send you an invoice reflecting the formula used to calculate the fee, the amount of assets under management on which the fee is calculated, and the time period covered by the fee. We encourage you to review these invoices and compare them to the account statements you receive from the qualified custodian to verify that appropriate fees are being deducted from your account. The qualified custodian does not verify the accuracy of the investment

advisory fees deducted. If you have any questions or concerns about your invoice, you are urged to contact us immediately.

Fees are calculated on the fair market value of your investment portfolio as of the first day of the calendar quarter. Your investment portfolio will typically hold investment options that are regularly traded on an open exchange with an observable market value, which is used to calculate the advisory fee. The account custodian provides the valuation of these securities. In the rare event your portfolio includes a holding which does not have an observable market value, we will use accepted industry methods for determining a fair market value for such holding. If you dispute our fair market valuation analysis, you may provide us with additional information to substantiate a different fair market value.

Your accounts may be aggregated in a “household” for purposes of determining the fee breakpoints outlined in the table above. A household includes accounts held by you, your spouse or partner, minor children, or adult children residing in your residence. A household also includes accounts in which any of the above-described persons have control, are a beneficiary, or otherwise have beneficial ownership.

The advisory fee is calculated on all assets held in your account, including cash and cash equivalents. We will not include any unmanaged cash assets in our fee calculations. If you wish to hold assets not under our management, such assets should be held in a separate account.

Fees are prorated based on the number of days services are provided during the initial billing period for services commenced at any time other than the beginning of a calendar quarter. The prorated fee for the initial billing period is based on the value of the account when services commence, and is due immediately.

Fees will be prorated for contributions to or withdrawals from your account exceeding \$50,000 that result in a prorated fee amount of \$50 or greater. Fees on additional assets received into your account are prorated based upon the number of days remaining in the calendar quarter. Fees on withdrawn assets are prorated based upon the number of days during the quarter the assets were under management.

You may terminate our Portfolio Management Services by providing written notice to us at least 30 days prior to your intended Termination Date. Your final fee will be prorated based on the number of days services are provided during the final billing period, up to and including the Termination Date, and will be calculated on the amount of assets under management on the Termination Date. Unearned fees paid in advance will be refunded upon termination.

Financial Planning Services

If you engage our Portfolio Management Services, we do not charge a separate fee for financial planning services. All financial planning services are covered by the Portfolio Management Services Fee described above.

Project-Based Financial Plan

If you would like our Financial Planning Services on a project basis, we charge a fixed fee based the complexity of your financial situation. Fixed fees typically range from \$3,800 to \$5,000, based on an estimate of the number of hours required to complete the plan. Fees may be higher or lower depending on your needs, and may be negotiable in some cases. Your specific fee will be discussed with you prior to engagement, and will be set forth in the Financial Planning Agreement. Fees are due and payable in full at the beginning of the engagement. We may offer you the ability to pay the fees in installments, at our discretion. We may also waive or reduce fees at our discretion.

Typically, Financial Planning Services will automatically terminate upon delivery of the final financial plan. Either party may terminate a Financial Planning Agreement earlier upon 30 days written notice to the other party. In the event you decide to terminate the Financial Planning Agreement early, you will be responsible for payment of our services provided prior to termination, based on an hourly rate of \$275 multiplied by the hours worked prior to termination. After deducting fees for hours worked to the date of termination, the balance of the prepaid fees will be refunded to you. We will provide you with any completed deliverables. However, please note if the Financial Planning Agreement is terminated prior to completion, the scope and/or soundness of any analysis or other work product made prior to completion may be limited, inaccurate, or incomplete due to the early termination.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we do not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors we consider in selecting or recommending broker-dealers and custodians for your accounts and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not charge performance-based fees, which are fees based on a share of capital gains in your account. In addition, we do not perform side-by-side management, which refers to the practice of simultaneously managing accounts that pay performance-based fees (such as a hedge fund) and those that do not.

Item 7 – Types of Clients

We generally provide our services to individuals (including high net worth individuals). Before receiving any advisory services, you will be required to enter into a written agreement describing our services and fees. We typically require a minimum investment amount of \$1,000,000 of total investable assets. However, in our sole discretion, we may waive this minimum requirement based on criteria such as anticipated future earning capacity or additional assets, client relationships, or account retention.

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

Methods of Analysis

We employ an evidence-based investing (EBI) approach – a portfolio management methodology rooted in long-term empirical evidence and academic research. This EBI methodology judiciously applies an objective discipline and seeks

to exploit empirically persistent factors such as value, momentum, quality, and trend, among others. Most of these factors are explained by behavioral finance and the tendency of humans to make irrational decisions when investing.

Even though there is evidence investors achieve better results by rejecting actively managed funds, market timing strategies, individual stock selection, macroeconomic forecasts, and subjective decision making, most investors still rely on such strategies. Fear and greed - rather than evidence - dictate investment decisions.

Our evidence-based investing approach applies a systematic discipline to remove emotion and filter out the never-ending avalanche of forecasts, opinions, and noise. It is not about predicting the next market swing - it is about avoiding the most common of investor mistakes. We generally employ long-term buy-and-hold passive investment strategies. We do not engage in marketing timing. While simple and unexciting, it is a discipline that exploits investment diversification, employs low cost, passive investments, in a tax-efficient manner, and seeks to capture historically reliable long-term risk premiums.

Investment Strategies

We use asset allocation strategies for portfolio management and with a long-term investment focus.

Asset allocation is a strategy designed to mitigate risk, but does not guarantee a profit or protect against losses. We build investment portfolios for clients using an asset allocation target based on their investment strategy, allocating your investments across asset classes, sectors, and industries.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals when the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

We will create a tailored investment strategy for you based on your unique circumstances, finances, goals, and risk tolerance. The investment strategy guides our portfolio management strategy for your investment portfolio. Portfolios will vary in risk level from our most aggressive Capital Growth Plus Model (all equities) to the conservative Enhanced Capital Preservation Model.

Portfolios are constructed using a strategic asset allocation where each asset class is assigned a target weight and acceptable boundaries from the target. We then employ a disciplined framework to rebalance the asset classes back towards the target weights as investment returns skew the original asset allocation percentages. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

We believe asset allocation is the chief determinant of variability in long-term returns. Our asset allocation process involves the strategic combination of unique asset classes with different risk and return characteristics. The resulting asset allocation is designed to produce the highest long-term returns for each client's acceptable level of risk. To construct portfolios, we employ the following asset classes:

Fixed Income Investments. These investments are intended to provide stability and income while reducing portfolio risk. They will include a combination of:

- Short-Term Bonds
- Intermediate-Term Bonds

- Long-Term Bonds
- Foreign Bonds
- Inflation Linked Bonds (TIPS)
- Municipal Bonds

Equity Investments. These investments are intended to provide long-term capital growth and to offer a long-term hedge of inflation and purchasing power risk. They will include a combination of:

- US Large Cap Equities
- US Small Cap Equities
- Developed Foreign Large Cap Equities
- Developed Foreign Small Cap Equities
- Emerging Market Equities

Alternative Investments. These investments have different risk and return characteristics than equities and bonds and are used to enhance overall portfolio diversification. We use these investments sparingly but when used, they will include a combination of:

- Managed Futures
- Real Estate (REITs)
- Diversified Arbitrage
- Long-Short Equity
- Credit/Interval Fund

In keeping with the evidence-based investing approach, many of the equity and bond investments we use allocate more heavily toward various factors such as:

- Value - Overweight stocks and bonds with more attractive valuations based on metrics such as price-to-book or price-to-earnings.
- Momentum/Trend – Overweight assets with a positive trend in earnings, cash flows, or price. often relative to related assets.
- Quality – Overweight shares of companies that have higher profitability as commonly measured by gross profits over assets and companies with better earnings quality as measured by differences between cash and accounting results.

The risks of evidence-based investing and allocating to factors such as value, momentum, trend, and quality include concentration risk, under performance relative to major benchmarks, excessive crowding of these factors, macro-economic risks, and factor-implementation risk.

Recommend Certain Types of Investments

We primarily recommend mutual funds and ETFs. When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.

Risk of Loss

All investments involve risk and may result in a loss of your original investment, which you should be prepared to bear. While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee your investment strategy will result in your goals being met, nor is there any guarantee of profit or protection from loss. Where applicable, we encourage you to read the fund prospectus or other investment offering documents to fully understand the risks associated with each investment.

General Risks

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

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: Bond prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true, bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Limited Markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Geopolitical Risk: The risk of financial and market loss because of political decisions or disruptions in a particular country or region.

Catastrophic Events: In addition to general market risks, investments may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

Investment-Specific Risks

Stock represents ownership in a company. If the company prospers and grows, the value of the stock should increase. Even if a company is profitable, the stock prices are subject to "market risk," which is attributable to investor attitudes. Stock ownership in more established companies is more conservative, while younger companies provide the most risk and reward opportunities.

High Yield Bonds have a lower credit rating than investment-grade bonds. Because of the higher risk of default, these bonds pay a higher yield than investment-grade bonds.

Mutual Funds are pooled investment vehicles, including money market instruments, stocks, bonds, or other investments. Professional money managers research, select, and monitor the performance of the securities the fund purchases. It is easier to achieve diversification through ownership of mutual funds than through ownership of individual stocks or bonds. Even with no-load or load-waived funds, there are mutual fund expenses paid to the fund company. Investors may have to pay taxes on capital gains distribution received by the fund but not distributed to the investor. Mutual funds redeem shares at net asset value ("NAV") at the end of the trading day.

Index Funds are pooled investment vehicles that aim to replicate the movements of an index of a specific financial market. The lack of active management generally gives the advantage of lower fees and lower taxes in taxable accounts. There are fees, which reduce the return to the investor relative to the index. It is usually impossible to precisely mirror the index, as the models for sampling and mirroring cannot be 100% accurate by their nature. The difference between the index performance and the fund performance is known as the "tracking error." By design, an index fund seeks to match rather than outperform the target index. Therefore, a good index fund with low tracking error will not generally outperform the index but instead produces a rate of return similar to the index minus fund costs. An index fund does not have to follow a well-known index. There are thousands of index funds, leaving advisers to determine which fund best matches the client's risk capacity and other investment objectives.

Exchange-Traded Funds ("ETF") hold securities to match the price performance of a specific market index or commodity price. ETFs can track stock indexes and sectors, bonds, and precious metals. ETFs are subject to the same market risks as the index or sector they are designed to track. ETFs can be bought and sold throughout the day like stocks. ETFs may be an index fund or a fully transparent, actively managed fund. Certain ETFs are relatively easy to understand, while others may have unusual or complex strategies. For example, "leveraged ETFs" seek to achieve performance equal to a multiple of an index after fees and expenses. These ETFs seek to achieve their investment objective daily only, potentially making them unsuitable for long-term investors. "Inverse ETFs" use various derivatives to profit from the decline in value of an underlying index or basket of assets.

Item 9 – Disciplinary Information

As a registered investment adviser, we are required to disclose material facts about any legal or disciplinary event that may be material to your evaluation of our advisory business or of the integrity of our management personnel. We do not have any legal or disciplinary events regarding our firm or our management personnel to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Neither our firm nor any of our management personnel are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. In addition, neither our firm nor any of our management personnel are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Based on the services you need, we may recommend you use an unaffiliated registered broker-dealer as the qualified custodian and broker for your accounts. We have established a relationship with a qualified custodian that facilitates our management of your accounts. Further information regarding this custodial relationship is provided in Item 12 below.

Our Investment Adviser Representatives also practice as accountants and tax preparers. You are under no obligation to use the services of your Investment Adviser Representative for these services. However, if you choose to do so, your Investment Adviser Representative will receive compensation in addition to any advisory fees we charge.

Other than the items disclosed above, we do not engage in any relationship or arrangement with financial services entities that create any material conflicts of interest between us and our clients.

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

Code of Ethics

As a fiduciary, our firm and our supervised persons have a duty of utmost good faith to act solely in the best interests of each client, which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity.

We have adopted a formal Code of Ethics to govern our business practices. We will provide a copy of our Code of Ethics to any client or prospective client upon request. All supervised persons are required to acknowledge their responsibilities under the Code and to agree to adhere to all provisions. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The Code includes policies regarding standards of professional conduct, conflicts of interest, insider trading, and personal security trading. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Participation or Interest in Client Transactions

We do not manage any proprietary funds or private investments; therefore, we do not have any material financial interest in any investments that may be used in client portfolios. We do not engage in principal transactions or agency cross transactions.

We invest predominantly in open-end mutual funds and exchange traded funds (ETFs), which helps to reduce conflicts of interest between trades made in accounts of our firm and our employees, even when such accounts invest in the same securities. However, in the event of other identified potential trade conflicts of interest, our goal is to place client interests first.

You should be aware that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment we may buy, sell or recommend for any other clients or for our own accounts.

Personal Trading

Our firm and its employees may buy or sell securities the same as, similar to, or different from, those we recommend to clients. Investing in securities in which clients also invest presents a potential conflict of interest. To help mitigate this conflict of interest, our firm and its employees will typically execute personal securities transactions after client

transactions, or may have personal securities transactions executed simultaneously with client transactions when participating in an aggregated (block) trade. See **Order Aggregation** in Item 12 below.

In an effort to reduce or eliminate conflicts of interest involving the firm or employee trading, we may restrict or prohibit certain transactions in our firm proprietary and employee accounts. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance. Our Chief Compliance Officer also reviews firm and employee holdings and transaction reports as required by our Code of Ethics.

Item 12 – Brokerage Practices

Our firm is not affiliated with any broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

We do not participate in any soft dollar arrangements, nor do we receive any referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

For accounts under our Portfolio Management Services, we have established relationships with qualified custodians and will recommend clients use one of these custodians to facilitate our management of their accounts. We execute client transactions directly with the qualified custodian that holds the client account. We do not allow clients to direct us to execute transactions through a specific broker-dealer. Not all advisers require their clients to direct brokerage. By directing brokerage, advisers may be unable to achieve most favorable execution of client transactions, and this practice may cost you more money. With our Financial Planning Services, clients may custody their assets at a custodian of their choice, and are responsible for executing transactions in their accounts.

We do not maintain custody of your assets we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see **Item 15—Custody**, below). Your assets will be maintained in an account with a broker-dealer acting as a “qualified custodian.”

Based on the services you need, we may recommend you use one of several unaffiliated registered broker-dealers, member FINRA/SIPC, as the qualified custodian and broker for your accounts. We have established relationships with custodians that help facilitate our management of your accounts.

These custodians will hold your assets in a separate brokerage account and will buy and sell securities when we and/or you instruct them to. Although we may recommend you use a particular custodian, you have the discretion to decide whether to do so and will open your account directly with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with one of the custodians with which we have an established relationship, we cannot manage your account for you.

Through our participation in the adviser programs offered by these custodians, we receive various benefits, provided without cost or at a discount, that may not be available to retail customers. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the

administration of our business and the management of client accounts, including accounts held with other custodians.

The availability of these services may be contingent upon us committing a certain number of accounts or assets under management to the custodian, but do not depend on the number of brokerage transactions directed to the custodian. These services are available to all advisers who participate in the custodial programs. Therefore, they are not considered soft dollar arrangements. The receipt of these benefits from the custodians creates a potential conflict of interest as we may have an incentive to recommend you maintain your account with a specific custodian. However, we strive to recommend the custodian that is most appropriate for you based on your individual needs.

Note that individual custodians establish their own trading policies and procedures that limit our ability to control, among other things, the timing of the execution of trades. Execution of trades may not be instant, and we are not able to control the specific time during a day that securities are bought or sold. Custodians will generally trade on the same business day as they receive instructions from you or from us. However, transactions will be subject to processing delays in certain circumstances (e.g., orders initiated on non-business days or after markets close).

Best Execution

We recognize our obligation in seeking best execution for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected custodian's transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Therefore, our firm will seek services involving competitive rates but it may not necessarily correlate into the lowest possible rate for each transaction. We have determined trading our clients' accounts through a preferred custodian is consistent with our firm's obligation to seek best execution of your trades. We regularly review and consider the overall quality and price of the services received from our preferred custodians in light of our duty to seek best execution.

Brokerage for Client Referrals.

We do not receive client referrals from any broker-dealer or custodian.

Order Aggregation

Client orders executed through the same broker dealer may be aggregated to achieve best execution. Each client will receive the average share price of all orders executed to fill the aggregated order. Transaction fees, brokerage fees, and commissions will be allocated on a pro rata basis. Transactions in accounts held by our firm or its supervised persons may participate in aggregated trading blocks along with client transactions; in such cases, share prices and expenses will be allocated equally among client accounts and those accounts of our firm and its supervised persons.

Investment Opportunity Allocation

We seek to provide investment decisions in accordance with our fiduciary duties to you and without consideration of our economic, investment, or other financial interests. To meet our fiduciary obligations, we attempt to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios. Accordingly, we seek fair and equitable allocation of investment opportunities and transactions among our clients to avoid favoring one client over another over time. It is our policy to allocate investment opportunities and transactions we identify as being appropriate and prudent among its clients on a fair and equitable basis over time.

Item 13 - Review of Accounts

With our Portfolio Management Services, at least quarterly, the Investment Adviser Representative responsible for your relationship will review the performance of your accounts and the applied investment strategy to ensure it remains appropriate. We may periodically adjust your account (a process referred to as rebalancing) to help ensure your investment portfolio remains consistent with your objectives, goals, and risk tolerances. Additional as-needed reviews and rebalancing may be conducted due to factors such as unusual or volatile performance, addition or deletions of client restrictions, or excessive withdrawals. Accounts may also be reviewed upon significant market, economic or political events.

You will receive transaction confirmation notices and account statements directly from your account custodian. We will provide quarterly portfolio summaries which include asset allocation details, position-level details, and portfolio performance. You are encouraged to compare our reports against the custodian's account statement. If you have any questions, you should contact us immediately.

When our Financial Planning Services are provided in conjunction with Portfolio Management Services, we will provide ongoing reviews of your financial circumstances and provide updates to your financial plan as needed. For project-based financial plans, we do not provide any ongoing monitoring, reviews, or reports.

Item 14 - Client Referrals and Other Compensation

Other than the benefits from custodians disclosed in **Item 12—Brokerage Practices** above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15 – Custody

Under government regulations we are deemed to have custody of client assets if you authorize us to instruct the custodian to deduct our investment advisory fees directly from your account. Other than the deduction of fees, we do not have custody of your funds or securities.

As explained in Item 12 above, you will open and maintain your investment accounts with a qualified custodian. The custodian will send account statements directly to you on at least a quarterly basis. These account statements will reflect all securities held as well as any transactions that occurred in the account, including the deduction of our investment management fee. We urge you to review the account statements received from your custodian and compare them to any invoices or reports you receive from us. We encourage you to contact us at the phone number on the cover of this Disclosure Brochure with any questions about your statements, invoices, or other reports.

Item 16 – Investment Discretion

With our Portfolio Management Services, you may choose for us to manage your accounts on either a discretionary or non-discretionary basis. See Item 4 for a description of these two options.

Recommendations made under our Financial Planning Services made with regard to accounts for which we do not provide Portfolio Management Services are provided on a non-discretionary basis. Clients are responsible for initiating any transactions necessary to implement our recommendations.

Item 17 – Voting Client Securities

We will not accept voting authority for securities held in your investment accounts. You maintain this responsibility. If you would like our opinion on a particular vote, you may contact us at the number listed on the cover of this Disclosure Brochure. In most cases, you will receive proxy materials directly from the Custodian.

Item 18 – Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include our balance sheet in this section. We do not have any financial condition reasonably likely to impair our ability to meet our contractual requirements to you. We have not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State Registered Advisers

Principal Officers

George Christian Mauser, CIMA®, CFP®, CRPC®, CRC and Rebecca O. Richardson, CFP® are the Managing Members of our firm. Their formal education and business background can be found on the accompanying Form ADV Part 2B Brochure Supplements.

Other Conflicts of Interest

Other than the advisory services described in this brochure, we are not engaged in any other business activities. We do not have any relationship or arrangement with any issuer of securities.

Performance-Based Fees

Neither our firm nor our supervised persons are compensated for advisory services with performance-based fees.

Disciplinary Disclosures

Neither our firm nor any of its supervised persons have been involved in any award resulting from an arbitration claim, or civil, self-regulatory, or administrative proceeding.

Privacy Policy

We recognize our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. We will not disclose your personal information to anyone unless it is required

by law or at your direction. We will not sell your personal information. We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so we can help design and implement the investment and financial planning related services we provide you; and to comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information we generate to service your financial needs.
- Information we may receive from third parties, such as the custodian who holds your account(s).

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. We may disclose your information: (1) to individuals and/or entities not affiliated with our firm, including, but not limited to certain service providers (e.g., broker-dealer, sub-advisers, account custodian) as necessary to service your account(s); (2) to your authorized representative or power of attorney; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

Because we share nonpublic information solely to service your account(s), you may not opt out of allowing us to share your information. In the event we have a change to our business practices which allows nonpublic information to be shared with other third parties, our Privacy Policy will be amended to allow you the opportunity to opt-out of such disclosure.

How We Protect Your Personal Information

Privacy has always been important to us. We restrict and limit access to client information only to those who need to carry out their business functions. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with our firm will be subject to confidentiality agreements.

Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Contact Us

Clients are encouraged to discuss any questions regarding our privacy policies and procedures directly with George Christian Mauser, Chief Compliance Officer at (770) 367-0300.

Business Continuity Plan

We have developed a Business Continuity Plan that outlines how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information.

Contacting Us. If after a significant business disruption, you cannot contact us as you usually do, you may attempt to contact us using one of the methods shown below to receive further instructions. If you cannot access us through these alternate means, you may contact the custodian who holds your account for assistance with your account. Contact information for your custodian may be found on your account statement.

Our Plan. We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, protecting the firm's books and records, and allowing our clients to transact business. In short, our Plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our Plan addresses: data backup and recovery; mission critical systems; alternative communications with clients, employees, regulators, and critical business constituents; alternate physical location of employees; and assuring our clients prompt access to their funds and securities if we are unable to continue our business.

Varying Disruptions. Significant business disruptions can vary in their scope, such as only our firm, the city where we are located, or the whole geographic region. The severity of the disruption can also vary from minimal to severe. Our Plan is flexible enough to address a variety of disruptions. We are able to work virtually from any location with Internet access, and we anticipate being able to resume business operations promptly in most scenarios. We will provide you with further instructions through the phone number or website listed below. If the significant business disruption is so severe that it prevents us from remaining in business, you still have access to your funds and securities directly through your account custodian.

For More Information. If you have questions about our Plan, you can contact George Christian Mauser, Chief Compliance Officer at (770) 367-0300, or visit our website at www.invest-atlas.com for further information.