



Item 1

Peachtree Wealth Advisors, Inc.

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Atlanta, GA 30342
404 531 0965
www.peachtreewa.com

March 14, 2024

This brochure, Form ADV part 2A, provides information about the qualifications and business practices of Peachtree Wealth Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at 404 531 0965. 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.

Our Brochure is also available on our web site www.peachtreewa.com, also free of charge.

Additional information about Peachtree Wealth Advisors, Inc also is available on the SEC's website at www.adviserinfo.sec.gov.

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

Item 2 Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Jonathan Lindvig at 404 531 0965 or lindvig@peachtreewa.com.

Additional information about Peachtree Wealth Advisors, Inc is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with PWA who are registered, or are required to be registered, as investment adviser representatives of Peachtree Wealth Advisors, Inc. Registration does not imply a certain level of skill or training. This brochure’s last annual update was on March 8, 2023.

Brochure Material Changes:

- None.

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Item 4 Advisory Business

Peachtree Wealth Advisors, Inc. (hereinto referred to as “PWA”), founded in 2004 by principals Jonathan Lindvig and David Frank, provides customized investment advisory services to clients in connection with establishing and monitoring of client investment objectives, risk tolerance, asset allocation goals and time horizon. Clients have the opportunity to place reasonable restrictions or constraints on the way their account is managed; however, such restrictions may affect the composition and performance of an individual client's portfolio. For these reasons, performance of the portfolio may not be identical with the average client at PWA.

Asset Management

As a part of advisory services, PWA may prepare a written financial plan and provide professional consultation as appropriate. Financial plans are based on information provided by the client. Client assumes full responsibility for implementation of the plan. All fees will be agreed upon prior to services being rendered. The services provided may include but would not be limited to the following:

- Retirement Planning Analysis
- Preparation of Annual Net Worth Statement
- Preparation of Cash Flow Statement
- Education Planning
- Performance Reporting
- Review of Current Investments
- Insurance Analysis and Planning

PWA may internally manage assets or recommend the third party asset management services of a third party money manager, who may provide ongoing portfolio management services for some of our clients. PWA offers these services based on the individual goals, objectives, time horizon, and risk tolerance of each client. If it is determined that the portfolio management services offered by a third party asset manager are in the best interest of the client, PWA will utilize the third party money manager to manage the client assets.

Pension Consulting Services

PWA provides pension consulting services separately or in combination. These services may include: Plan Design, Designing the Investment Lineup, Administration of the Plan, Service, Education or Fiduciary Support.

We will meet with the client to discuss the major plan goals, identify the key employees, options for contributions and income tax considerations. PWA will determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. PWA will design an investment lineup that meets the plan sponsor's goals and objectives and will monitor the investments for potential changes.

Company-Sponsored Retirement Plan Consulting Services

PWA provides company-sponsored retirement plan consulting services (hereinafter called “retirement plan consulting services”). These services may include plan design, investment

lineup selection and monitoring, plan administration support, education, co-fiduciary support, and benchmarking.

We will meet with the client to discuss the major plan goals, identify key employees, evaluate employer contribution options, and analyze income tax considerations. PWA will assist with the development of an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the plan. PWA will design an investment lineup that meets the plan sponsor's goals and objectives and will monitor the investments for potential changes.

As of March 5, 2024 PWA assets under management total \$275,580,219. Financial advisors at PWA are also registered representatives of Arkadios Capital, a broker-dealer registered with FINRA. Accounts utilizing Arkadios Capital as broker-dealer facilitate transactions on a commission basis and are not included in the PWA advisory business assets under management. PWA manages all accounts in the same manner regardless of the account type.

Item 5 Fees and Compensation

Annual Fixed Fees

PWA may charge a fixed fee for independent financial planning and professional consultation services. PWA's fixed fee range is from \$100.00 to \$25,000.00 on an annual basis depending on the level and scope of the services required. The determination of a fixed-fee amount is negotiable and will vary based upon any number of factors which may be specific to each client's set of circumstances. Financial planning or professional consultation services that are anticipated to be more complex will generally warrant a higher fixed-fee amount. Fees for these services are billed in advance and due within thirty days. All fees will be agreed upon prior to services rendered.

Fee-Based Accounts - Individuals

PWA may charge an advisory fee that represents compensation to PWA for asset management, investment advice and services provided. All fees are established in a written advisory agreement for each client. Fees for accounts are payable quarterly in advance, based on the quarter end balance. The first payment of the Management Fee will be based upon the market value of the assets in the account as of the close of business of the day on which the account is funded and made available to Adviser to provide investment management services. Advisory fees will be due and payable on the following day. The first payment will be prorated to cover the period from the date the account is funded through the end of the calendar quarter. Thereafter, the management fee shall be based upon the market value of the account as of the close of business on the last business day of each calendar quarter and will be due and payable on the first business day of the following calendar quarter. Advisory fees will be taken first from free credit balances or from the liquidation of the client's shares of any money market funds or balances. PWA may prorate the initial quarterly fee based on capital contributions and withdrawals due to the timing of incoming asset transfers and journals. PWA will not prorate or adjust the quarterly fee based on capital contributions or withdrawals after the initial quarterly fee. All prorated billing is based on 365 calendar days. Fee calculations are not verified by a custodian or any third party. The advisory fee is negotiable and the agreement may be terminated by either party at any time by written notice. Clients can terminate an

advisory agreement without penalty, by giving PWA a written notice within five (5) days of signing the investment advisory agreement. PWA requires at least a thirty (30) day written notice for termination of an existing advisory agreement. Fees paid in advance will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client via direct deposit to their account. Fees may only be changed after a new investment advisory agreement is signed by the client and PWA. All investment advisory agreement changes will be implemented the next quarterly billing cycle.

Fee-Based Accounts - Institutions

Fees are charged in advance, quarterly as indicated on the negotiated billing arrangement with the plan sponsor. The fees may be charged to the plan sponsor or to the plan participant depending upon the discretion of the plan sponsor. The fees are based primarily on asset size and level of complexity of services provided. PWA has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Annual fees range up to 2.00%, depending on the plan size.

SCHEDULE OF FEES

PWA does not have a minimum account size and advisory fees are negotiable. The asset based fee schedule for accounts is as follows:

Portfolio Value	Annual Fee
\$0 - \$1,000,000	2.00%
\$1,000,0001+	1.00%

PWA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment 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. Clients should ask PWA for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the advisory fee. Mutual funds 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 PWA's advisory fee.

Fee Reconciliation

Client accounts will be sampled to ensure that appropriate fees are charged. The client's contract will be reconciled with the fee charged by PWA and debited by the custodian; Any discrepancies will be resolved, documented and maintained within the customer file. In any circumstance that the client was harmed, the client will be made whole.

Fee-Based Third-Party Managed Accounts

THIRD-PARTY MANAGED ACCOUNTS

Third party managed account programs provide access to a number of non-affiliated third party money managers with various specialties and investment strategies (i.e., fixed-income,

small cap, international, etc), as well as asset allocation or asset management services. A third party managed account is an investment portfolio that is managed on a discretionary basis by a third-party money management firm primarily through individual stocks, bonds, ETFs, or mutual funds. The duties of PWA will include assisting the client in choosing investment objectives and appropriate investment managers, setting restrictions or limitations on the management of the account, explaining portfolio strategies and transactions and answering client questions. Furthermore, PWA reviews the performance of third party advisers on at least an annual basis and prior to introducing clients to the non-affiliated investment advisers.

The client pays a quarterly fee for its services based on a percentage of the value of the client's account. The RIA fee for each type of account is negotiable; though the third-party manager's fee may or may not be negotiated. However, these fees collectively will not exceed 2% annually. In addition, minimum account balances may be required by the third-party manager. Specific account information regarding these fees and other possible restrictions are disclosed in the managed account agreement.

The Private Managed Account Client Agreement may be terminated by either party upon written notice, which shall be effective when received by the other party or upon passing of ten (10) business days from the date of termination notice, whichever occurs first. A full refund will be provided if the client terminates the contract, in writing, within five (5) days of the contract being executed. Fees paid in advance will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client via direct deposit to their account.

Item 6 Performance-Based Fees

PWA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client)

Item 7 Types of Clients

PWA provides portfolio management services and investment advice to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, and trusts but may provide services to other entities as well.

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

PWA uses a fundamental method of security analysis with a top-down approach. Fundamental analysis involves but is not limited to analyzing financial statements, management capabilities and overall health of a company or institution based on certain ratios and metrics. The top-down approach begins analysis with global economics and various economic indicators such as inflation, interest rates and GDP.

The investment strategies used to implement any investment given to clients includes:

- ⌘ Long term purchases (securities held at least a year)
- ⌘ Short term purchases (securities sold within a year)
- ⌘ Trading (securities sold within 30 days)
- ⌘ Margin transactions
- ⌘ Option Writing, including covered options, uncovered options or spreading strategies

Investing in securities involves risk of loss that clients should be prepared to bear. All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Item 9 Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events. PWA has no information applicable to this Item.

Item 10 Other Financial Industry Activities and Affiliations

Jonathan Lindvig and David Frank are licensed insurance agents with several insurance companies for the purpose of selling life, health, long-term care, disability, and annuities. Insurance products recommended may result in a commission being received. This practice causes a potential conflict of interest that gives us an incentive to recommend investment products based on the compensation received rather on a client's needs. We address this by looking at the entire financial situation of each client and recommending products and services that meet the needs of the client without regard to the compensation paid to us.

Financial advisors at PWA are registered representatives of Arkadios Capital ("Arkadios"). When recommendations are implemented through Arkadios, the normal and customary commissions will be paid to advisors at PWA. Clients of PWA are under no obligation to implement investment recommendations through PWA or Arkadios. Commissions may be higher or lower at Arkadios than other broker/dealers.

Item 11 Code of Ethics

Peachtree Wealth Advisors and all supervised members will:

1. Act with integrity, competence, and in an ethical manner when dealing with clients, prospects, and employees.
2. Hold all parties associated with PWA accountable to the same level of integrity and competence demanded by employees PWA.
3. Strive to maintain and continually improve our competence and the competence of others in the profession.
4. Disclose and resolve conflicts of interest before taking any action on behalf of the client.
5. Safeguard all nonpublic information.
6. Comply with all regulatory guidelines and authorities.

All employees will annually confirm that they will abide by the code of ethics by signing and dating page 1 of the PWA compliance manual.

From time to time, PWA may cause clients to buy a security in which PWA or an associated person has an ownership position, or PWA or an associated person of PWA may purchase a security of the same class as securities held in a client's account. It is PWA's policy not to permit associated persons (or certain of their relatives) to trade in a manner that takes advantage of price movements caused by clients' transactions.

From time to time, trading by PWA and its associated persons (and certain of their relatives) in particular securities may be restricted in recognition of impending investment decisions on behalf of clients. If transaction orders for a client and PWA (and/or its associated persons and relatives) are not aggregated, then transaction orders for PWA and its associated persons will be the last orders filled. PWA's members, officers and employees will be required to report all personal securities transactions to PWA. PWA and its associated persons may purchase or sell specific securities for their own account based on personal investment considerations without regard to whether the purchase or sale of such security is appropriate for clients.

PWA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jonathan Lindvig.

Item 12 Brokerage Practices

From time to time, PWA may refer the client to broker-dealers for the purposes of effecting securities transactions. PWA is not a broker-dealer. In no case shall PWA act or attempt to act in the capacity of "broker of record" or "custodian" for the client's account, funds, or other assets.

Although not all-inclusive, PWA may recommend the following brokers of record and/or custodians.

Broker of Record: Arkadios Capital

Custodian: National Financial Services

Custodian: Fidelity Brokerage Services LLC

The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to affect the same transaction where the firm determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. Brokerage commissions paid by a client may be used to pay for research that is not used in managing the clients account. PWA receives a benefit from recommending a broker-dealer or custodian because we may not have to produce or pay for research as well as certain products or services.

In seeking best execution, the determinative factor is not always the lowest possible cost, but whether the transaction represents the best qualitative execution taking into consideration the full range of broker-dealer services. Several factors are taken into consideration which include but are not limited to: breadth of investment products, execution capability, commission rates and responsiveness. PWA does not aggregate client trades and therefore clients may not always receive the best price or trading cost although any broker-dealer utilized may aggregate trades.

For those clients that elect to purchase securities through financial advisors at PWA in their positions as registered representatives of Arkadios, the financial advisor will receive normal commissions which are disclosed to the client. Transactions for a client's account may be affected through Arkadios in return for research products and/or services, which assist the firm in its decision-making process. Clients who are invested in shares of mutual funds through Arkadios Capital, or mutual funds transactions going direct to the fund where Arkadios is indicated as broker-dealer of record will pay a management fee through the mutual the fund. Also, some funds may charge 12(b)-1 fees and brokerages and trustees may charge transaction fees for the purchase or redemption of shares. PWA may receive a portion of the

management and administrative fees including 12(b)-1 fees charged by third-party investment advisors. This practice causes a potential conflict of interest that gives us an incentive to recommend investment products based on the 12(b)-1 fees received rather on a client's needs. We address this by looking at the entire financial situation of each client and recommending products and services that meet the needs of the client without regard to the compensation paid to us.

Soft dollar benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations are connected to particular clients or groups of clients.

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Item 13 Review of Accounts

All accounts are reviewed annually (or more frequently as agreed) by a member of the PWA Advisory Committee for overall adherence to the investment philosophy employed by PWA and any specific requirements of the client. The client's objectives and time horizon are used to review for suitability. Accounts will also be reviewed at any time changing market conditions warrant.

PWA Advisory Committee:

Jonathan Lindvig, Managing Partner
David Frank, Managing Partner

Generally, all investment reports are provided during each review cycle with the client, as mutually agreed. Clients may request additional reporting. Monthly and/or quarterly reports are provided to clients by the custodian of the assets.

Item 14 Client Referrals and Other Compensation

PWA does not compensate any individual or firm for client referrals. Additionally, PWA does not receive any type of compensation for referring clients to other professional service providers.

Item 15 Custody

PWA does not act in the capacity as custodian for clients' accounts.

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third-parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise limited custody over your funds or securities and for regulatory reporting purposes, we are required to keep track of the number of clients and accounts for which we may have this ability. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other "qualified custodian" that holds and maintains client's investment assets. The account

statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. PWA urges you to carefully review such statements.

Item 16 Investment Discretion

Clients may furnish PWA with discretionary authority to buy and sell securities. PWA may exercise discretion over the following areas/items: specific securities to be bought or sold; amount of securities to be bought or sold; particular broker or dealer to be used for arranging securities transactions. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives and time horizon as agreed upon for the particular client's account. Investment guidelines and restrictions as well as discretionary authority should be provided in writing

PWA's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 17 Voting Client Securities

As a matter of firm policy and practice, PWA does not have any authority to and does not vote proxies on behalf of advisory clients. PWA does not render any advice with respect to the voting of proxies. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Item 18 Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about PWA's financial condition. PWA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. PWA is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$1,200 six or more months in advance.

Item 19 Requirements for State-Registered Advisers

This section is not applicable because our firm is SEC registered.

PEACHTREE WEALTH ADVISORS, INC.
PRIVACY POLICY NOTICE

Peachtree Wealth Advisors, Inc. has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

We do not sell, share, or disclose your nonpublic personal information to non-affiliated third party financial companies. We will not disclose the nonpublic personal information we collect about our customers to anyone except as necessary as follows: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs), however **we will not do so**. These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

Form ADV 2B: Brochure Supplement

March 14, 2024



Item 1 Cover Page

**Jonathan Lindvig
David Frank**

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This brochure supplement provides information about Jonathan Lindvig and David Frank that supplements the Peachtree Wealth Advisors brochure. You should have received a copy of that brochure. Please contact Jonathan Lindvig at 404-531-0965 if you did not receive Peachtree Wealth Advisors brochure or if you have any questions about the contents of this supplement. Our Brochure is also available on our website www.peachtreewa.com.

Additional information about Jonathan Lindvig and David Frank is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Jonathan S. Lindvig, born 1977

Education:

1999 B.A. Economics, University of Georgia
2000 Institute of Int'l Business Development at HKBU, Hong Kong, China

Business Background:

1999-2000 Staff Accountant, Arthur Anderson
2001-2004 Financial Advisor, Morgan Stanley
2004-present Managing Partner, Peachtree Wealth Advisors, Inc
2004-2023 Registered Representative, Triad Advisors, Inc., Broker-Dealer
2023-present Registered Representative, Arkadios Capital, Broker-Dealer

Item 3 Disciplinary Information

Legal and Disciplinary Reports:

Jonathan Lindvig has no legal or disciplinary reports to disclose.

Item 4 Other Business Activities

Jonathan Lindvig may receive compensation from commissions or mutual fund fees based on the sale of securities, insurance and investment products. This practice causes a potential conflict of interest that we address by looking at the entire financial situation of each client and recommending products and services that are in the best interest of the client.

Jonathan S. Lindvig is a licensed insurance agent with several insurance companies for the purpose of selling life, health, long-term care, disability, and annuities. Insurance products recommended may result in a commission being received. This practice causes a potential conflict of interest that gives us an incentive to recommend investment products based on the compensation received rather on a client's needs. We address this by looking at the entire financial situation of each client and recommending products and services that meet the needs of the client without regard to the compensation paid to us.

Jonathan Lindvig is a registered representative of Arkadios Capital, ("Arkadios"). When recommendations are implemented through Arkadios, the normal and customary commissions will be paid to advisors at PWA. Clients of PWA are under no obligation to implement investment recommendations through PWA or Arkadios. Commissions may be higher or lower at Arkadios than other broker/dealers.

Item 5 Additional Compensation

Jonathan Lindvig does not receive compensation for referrals and does not compensate individuals for referrals.

Jonathan Lindvig may receive economic benefits (including commissions, luncheons, equipment, research or non-research services) from non-client or product sponsors in connection to giving advice to clients. PWA investment policies are designed to limit any interference with the independent decision-making process when choosing the best investments for clients.

Item 6 Supervision

All Firm personnel are supervised by the firm's Managing Partners and the Chief Compliance Officer. Supervision is ongoing and includes, account reviews, trade supervision, staff meetings and employee reviews.

Item 7 Requirements for State-Registered Advisors

Jonathan Lindvig has never been involved in or been found liable in any arbitration claim, including those alleging damages in excess of \$2,500.

Jonathan Lindvig has never been involved in or found liable in a civil, self-regulatory organization or administrative proceeding.

Jonathan Lindvig does not have any relationships or arrangements with any issuer of securities of any kind.

Jonathan Lindvig has never been the subject of a bankruptcy petition or proceeding.

Item 2 Educational Background and Business Experience

David Frank, born 1976

Education:

2000 B.B.A., Finance, Summa Cum Laude with Honors, University of Georgia

Business Background:

2001-2003	Associate, Helton Asset Management
2004-2005	Associate, Homrich and Berg
2004-present	Managing Partner, Peachtree Wealth Advisors, Inc
2009-2023	Registered Representative, Triad Advisors, Inc., Broker-Dealer
2023-present	Registered Representative, Arkadios Capital, Broker-Dealer

Item 3 Disciplinary Information

Legal and Disciplinary Reports:

David Frank has no legal or disciplinary reports to disclose.

Item 4 Other Business Activities

David Frank may receive compensation from commissions or mutual fund fees based on the sale of securities, insurance and investment products. This practice causes a potential conflict of interest that we address by looking at the entire financial situation of each client and recommending products and services that are in the best interest of the client.

David Frank is a licensed insurance agent with several insurance companies for the purpose of selling life, health, long-term care, disability, and annuities. Insurance products recommended may result in a commission being received. This practice causes a potential conflict of interest that gives us an incentive to recommend investment products based on the compensation received rather on a client's needs. We address this by looking at the entire financial situation of each client and recommending products and services that meet the needs of the client without regard to the compensation paid to us.

David Frank is a registered representative of Arkadios Capital, ("Arkadios"). When recommendations are implemented through Arkadios, the normal and customary commissions will be paid to advisors at PWA. Clients of PWA are under no obligation to implement investment recommendations through PWA or Arkadios. Commissions may be higher or lower at Arkadios than other broker/dealers.

Item 5 Additional Compensation

David Frank does not receive compensation for referrals and does not compensate individuals for referrals.

David Frank may receive economic benefits (including commissions, luncheons, equipment, research or non-research services) from non-client or product sponsors in connection to giving advice to clients. PWA investment policies are designed to limit any interference with the independent decision-making process when choosing the best investments for clients.

Item 6 Supervision

All Firm personnel are supervised by the firm's Managing Partners and the Chief Compliance Officer. Supervision is ongoing and includes, account reviews, trade supervision, staff meetings and employee reviews.

Item 7 Requirements for State-Registered Advisors

David Frank has never been involved in or been found liable in any arbitration claim, including those alleging damages in excess of \$2,500.

David Frank has never been involved in or found liable in a civil, self-regulatory organization or administrative proceeding.

David Frank does not have any relationships or arrangements with any issuer of securities of any kind.

David Frank has never been the subject of a bankruptcy petition or proceeding.