

Item 1: Cover Page



Handcrafted Advice, Planning, and Portfolios

(Firm CRD #143379 / SEC #801- 111051)

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This Form ADV Part 2A Brochure (or "Brochure") provides information about the investment qualifications and business practices of LotusGroup Advisors, Inc. ("LotusGroup," "LGA," the "Adviser," "us," "we," or "our"), an investment adviser registered with the United States Securities and Exchange Commission. If you have any questions about this brochure's contents, please contact LotusGroup's Chief Compliance Officer, Amanda N. Cohen, at 720.593.9861.

This Brochure's information has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or any state securities authority. Nothing in this document is to be construed as a recommendation or an endorsement by the SEC or any state securities authority or an offer of securities; please refer to the actual investment offering and related legal documentation for complete disclosures. Any reference to or use of the terms "registered investment adviser" or "registered" does not imply LotusGroup or any of its associated persons have achieved a certain level of skill or training. Investments involve risk, including the possible loss of principal. An adviser's written and oral communications provide you with information to determine whether to retain their services. As required by federal and state regulations, this Brochure is on file with the appropriate regulatory authorities.

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

*(Click on the link, select "Investment Adviser Firm," and type in the firm's name or CRD #143379.)
Results will provide you with all parts of the firm's disclosure brochures.)*

Item 2: Summary of Material Changes

Update

LotusGroup Advisors reviews its Form ADV Part 2A Brochure at least annually to confirm it remains current. In this item, we are required to summarize only those material changes made to the Brochure since the last annual updating amendment of March 2023. Since the previous annual amendment, changes have been created to the following Brochure areas:

Personnel

- Added Mr. Brian McAuliffe as an Investment Advisor Representative with an ADV Part 2B brochure.
- Mr. Nicholas Pirnack earned his Certified Exit Planning Advisor designation in February 2023. Therefore, the acronym “CEPA” is now reflected after his name on his ADV Part 2B brochure. Also added additional compensation from new Business Valuation service he will provide on behalf of the firm.
- Mr. Matthew Woolbright updated his Outside Business Activities.
- Removed Mr. Andleib Seth as an Investment Advisor Representative as he has been a silent partner at the Firm and does not give financial advice.

Fees

- Updated fee schedule as disclosed in Client Agreements (See Item 5; Fees and Compensation)

Types of Advisory Services

- Updated Item 4: Advisory Business, Item 5: Fees and Compensation, and Item 7: Types of Clients to remove IncomePlus Fund and IncomePlus Fund II. LGA’s affiliate LotusGroup Capital (“LGC”) purchased these Private Funds from LGA. No changes to the management or strategy of the Funds.
- ERISA updated disclosure information.
- Updated Item 4: Advisory Business, Item 5: Fees and Compensation to include the new business line for LGA, which is a business valuation service.
- Replaced reference to TD Ameritrade Inc. with Charles Schwab & Co., Inc.
- Under Related Parties, added the LotusGroup IncomePlus Fund II, L.P.

Full Brochure Availability

This Form ADV Part 2A Brochure applies to all LotusGroup advisory accounts, including any accounts a client may open in the future. The adviser may, at any time, amend this document to reflect changes in its business practices or for other required updates as mandated by securities regulators. Annually, we will provide clients - either by electronic means or by hard copy, with a copy of this Brochure or a "summary of material changes" notice from the document previously distributed.

Please retain this for future reference, as it contains essential information concerning LGA advisory services and business. At any time, you may view the current disclosure brochures online at the SEC's Investment Adviser Public Disclosure website at <https://adviserinfo.sec.gov/> by searching the firm name or CRD #143379. You may also request a copy by contacting us at 720.593.9861.

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Item 4: Advisory Business

Description of the Advisory Firm

LotusGroup Advisors, LLC (after this "LotusGroup" or "LGA") is a privately held Registered Investment Advisor company that was formed on December 22, 2006, and is organized as a limited liability company under the laws of the State of Colorado. The Firm has been in business since January 2007. It is principally owned by Raphael A. Martorello, Managing Partner (85.7%), Andleib "Andy" Seth, Partner (9.5%), Nicholas S. Pirnack, Partner and Senior Advisor (2.9%), and Stephanie L. Schlemeyer, Partner and Product Manager (1.8%). LGA is authorized to do business in any state but also has specific registrations in the states of California, Colorado, New Hampshire, New York., and Texas. *(Please refer to Form ADV Part 2B for details of their formal education and business background.)*

Types of Advisory Services

LotusGroup offers the following services to advisory clients:

Financial Planning & Portfolio Management

LotusGroup Advisors offers financial planning services and advice, investment advisory and portfolio management services for private clients, solicited clients, and companies (all collectively called "clients" going forward in this document) through a Full Trading Authorization and a Limited Power of Attorney.

LotusGroup Advisor's minimum asset requirement for new clients is generally \$500,000. LotusGroup Advisors may make an exception to the minimum asset requirement at its sole discretion. Although this practice is highly recommended for ongoing savings, asset allocation, and tax efficiency, there are no ongoing contribution requirements.

Clients undergo an introductory interview to outline their financial situation and help LotusGroup Advisors set risk tolerance and investment objectives. Clients then choose a portfolio strategy based on their risk profile, investor behavior profile, liquidity needs, and the amount of assets that LotusGroup Advisors will be managing on their behalf. Clients select one of six risk profiles: aggressive, moderate-aggressive, moderate, conservative-moderate, conservative, and ultra-conservative, and choose one of six portfolio strategies based on behavior profile and assets: emerging, global index, global rotation, tactical active, tactical absolute, and private investment only.

LotusGroup Advisors meets with clients periodically to review their financial situation, answer questions, and determine if adjustments are needed relative to their financial objectives, risk tolerance, and time horizon. For individual clients who have expressed interest, we offer a complimentary financial planning service to help them make major life decisions and track how they are doing against their goals on an ongoing basis.

LotusGroup Advisors may, at times, manage and advise on client assets applicable to ERISA. Such instances may include IRA accounts and other plans that are not subject to ERISA but are subject to section 4975 of the Internal Revenue Code. LotusGroup Advisors understands that, as a manager or potential manager of ERISA, plan assets, and/or as a manager for assets subject to section 4975 of the Internal Revenue Code, the Firm and its supervised persons must satisfy ERISA's fiduciary standards.

LotusGroup Advisors does not participate in wrap fee programs by providing portfolio management services and, therefore, receives no portion of a wrap fee for LGA services. LotusGroup Advisors may pay referral fees to solicitors in exchange for client referrals; at this time, no such relationship exists.

LotusGroup Advisors provides the above services, managing \$226,619,872 in client assets, \$160,163,730 on a discretionary basis, and \$66,456,142 on a non-discretionary basis as of December 31, 2023. LotusGroup Advisors performs daily management activities within the guidelines of an Investment Policy Statement ("IPS") without day-to-day client consultation (known as "discretionary" management of assets). All funds are held in a client's account at an independent brokerage firm(s), and each client authorizes invoices to be paid from their account(s).

Also, LotusGroup provides:

- Account setup and transfers to a selected Broker/Custodian,
- Development of a Client Investment Policy Statement ("IPS"), along with a personalized savings & investment program,
- Discretionary selection of specific investments within the program,
- Periodic adjustment of the asset allocation model within the stated client's category grouping and risk profile,
- Weekly administration of portfolio rebalancing as assets move outside of a specified target range,
- Production and distribution of individual quarterly performance reports,
- Production and delivery of client newsletters,
- Ongoing reviews and updates of client goal trackers,
- Personalized advice and analysis to assist in making good decisions,
- Sourcing, negotiation, and sharing of private investment opportunities enable accredited clients to select the opportunity they would like to participate in, the amount they would like to invest, and an account in which they would like to invest. (The aforementioned is LGA's "non-discretionary" investment management business, wherein each client chooses investments for themselves, with LGA providing access, advice, and ongoing updates. These services are only available for clients that are self-determined as "Accredited" investors.)
- Support in setting up 401K plans for small business owners and investment fund line-up evaluation and selection services.

Business Valuation Services

LGA offers business valuation services to current and prospective clients of the Firm. These business valuations are administered by a Certified Exit Planning Advisor ("CEPA") at the Firm. These services are targeted to be provided to sophisticated business owners across many industries, including, but not limited to, accounting, finance, trades, goods manufacturing, consultation services, energy exploration, midstream energy services, retail stores, and other small and mid-size businesses.

Business valuation clients will undergo initial meetings and interviews with LGA to identify the intention of the valuation, such as for a sale of the entity or for other means, and the tentative time horizon for any such actions based on the finalizing of the valuation opinion by LGA. The completion of LGA's valuation opinion will vary depending on the availability of information from the business owner but typically takes between four (4) and eight (8) weeks to complete.

Client Tailored Services & Client Imposed Restrictions

LGA offers the same suite of services to all its clients. In rare cases, a client can request that LGA does not sell specific legacy securities (e.g., an inherited stock with large capital appreciation).

Clients can impose restrictions on investing in certain securities or types of securities by their values or beliefs. However, if the restrictions prevent LGA from adequately servicing the client account or if the limits require LGA to deviate from its standard suite of services, LGA reserves the right to end the relationship.

Item 5: Fees & Compensation

Please note, unless a client has received the Firm's disclosure brochure at least 48 hours before signing the investment advisory contract, the client's investment advisory contract may be terminated within five (5) business days of signing the contract without incurring any advisory fees. LotusGroup's payment is dependent upon the type of advisory service performed. Management fees are not negotiable, albeit LGA reserves the right to provide a one-time fee

discount to adjust for a specific client situation (e.g., LGA may provide a fee credit for idle cash in the case where a client would like to invest in a private offering that won't be available for several months but deposits money into an account ahead of time).

Fee Schedule

Investment Management Fees

The LotusGroup Advisors' management fee is based solely on the client's assets under management. LotusGroup Advisors does not utilize alternative compensation schemes, such as mutual fund kickbacks, commissions, performance pay, etc., to align client and advisor interests while minimizing conflicts of interest.

LotusGroup Advisors' management fees are based on assets under management and investment strategy selected, which are detailed in Client Agreements. New clients to LotusGroup Advisors with up to \$500,000 in assets under management may be designated an "Emerging Client" and would be subject to a flat annual fee charged to the Client quarterly. Once the \$500,000 assets under the management threshold is surpassed, the Client will be moved from the Emerging Client structure to the corresponding fee structure of their investment strategy.

Each strategy and the corresponding fees are detailed in the fee schedule:

<u>Assets Under Management</u>	<u>Incremental Fee Charged Per Annum</u>
<i>Tactical Strategies</i>	
on the first \$1 Million*	1.75%
On amounts in excess of \$1 Million	0.75%
<i>Global Rotation Strategies</i>	
On the first \$1 Million	1.50%
On amounts in excess of \$1 Million	0.75%
<i>Global Index Strategies</i>	
On the first \$1 Million	1.25%
On amounts in excess of \$1 Million	0.75%
<i>Black Label Services</i>	
On the first \$1 Million	1.75%
Next \$1 to \$20 Million	0.75%
Amounts in excess of \$20 Million	0.50%
<i>Private Only</i>	
On the first \$1 Million	1.75%
On amounts in excess of \$1 Million	0.75%
<i>Emerging Client</i>	
On the first \$500K in assets under management	\$10K annually, charged quarterly

Solicited clients also have a specific fee schedule based on assets under management and investment strategy picked. Financial planning fees are broken out separately, all of which are clearly articulated in the Solicited Client Agreement. LotusGroup Advisors retains the discretion to negotiate fees. Clients may be able to find advisory services at lower prices, and LGA maintains the discretion to negotiate fees and has a small subset of clients with reduced or free fee schedules.

Pro-rated fees are calculated and billed in advance at the beginning of each calendar quarter, based on the current assets under management before the market opens, on the first day of the quarter, including cash held in accounts. For clarity, private assets are valued based on the last reported value from the applicable fund sponsor, from a third-party firm, or LGA's good faith valuations, all of which may or may not be audited. Actual values may be higher or lower than the amount shown on an offering statement or custodian statement. Consequently, portfolio values may reflect estimated values, and prices may not reflect the value at which securities could be sold.

Fees are deducted mid-quarter on the 45th day of the quarter. For the first quarter, the billing statement is prorated based on the client's start date. The client's start date is the date both parties sign the contract. However, management fees are not calculated or charged until the first day when funds arrive in the client's account(s). Upon account closure (at will by either party), prorated fees will either be collected from or returned to the client based on the day funds are withdrawn from the Advisor's supervision by terminating the Client Agreement in writing.

LotusGroup Advisors automatically deducts advisory Fees from the Client's account. In all cases, the Client receives an invoice from LotusGroup Advisors before the withdrawal. The client authorizes withdrawals through a signed Customer Agreement and written authorization with the Custodian. Invoices are sent to clients at the beginning of each quarter but no later than the 15th day of the first month in the quarter, along with their quarterly reporting packet. The Custodian also sends monthly account statements to the Client with the management fee transaction displayed in its withdrawal month. LotusGroup Advisors sends the Custodian invoices for withdrawal of fees on the 45th day of the quarter.

Clients incur portfolio expenses from brokerage transaction fees, wire transfer fees, annual private asset custodian fees, and underlying mutual fund and ETF expenses. LotusGroup Advisors has taken numerous steps to minimize these investment costs by selecting a lower-cost brokerage for clients to access, utilizing many free or no-transaction-fee funds, and selecting lower-cost ETF funds for the predominant portion of client portfolios. Please refer to 'Item 12' of this brochure for more information regarding brokerage practices.

Business Valuation Fees

LotusGroup Advisors charges a flat fee for providing business valuation opinion services. This fee is stated, non-negotiable, and set for all current clients and prospective clients.

LGA Business Valuation Opinion	\$1,500.00 / entity valuation provided
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Fees are paid upfront to LGA at the time of contract execution. In the event that the contract is with a current LGA client, the fee may be paid by deducting the amount directly from the client's account, as advised by LGA. For those that are not current LGA clients, fees must be paid to LGA by way of a check, written out to the firm and mailed to the firm's address.

Item 6: Performance-Based Fees & Side-By-Side Management

LGA's wealth management fee is based solely on client assets under management. The Firm does not utilize alternative compensation schemes such as mutual fund kickbacks, commissions, performance-based fees (*i.e.*, fees calculated based on a share of capital gains on or capital appreciation of the client's assets or any portion of the

client's assets) or attempt to help align client and advisor interests.

Consequently, LGA does not engage in the side-by-side management of accounts charged a performance-based fee with accounts charged with another type of fee (such as assets under management). As described above, LGA provides services for an advisory fee based upon a percentage of a client's assets under management, which is by state and federal requirements.

Item 7: Types of Clients

LotusGroup Advisors provides discretionary and non-discretionary investment advice and supervisory management services and solicits several types of clients, including the following:

- Private individuals (taxable accounts, retirement accounts, educational accounts).
- High-net-worth individuals.
- Pooled investment vehicles (other than investment companies and business development companies).
- Trusts (personal and business accounts).
- Companies that have excess cash that they would like to have invested conservatively.
- Pension and profit-sharing plans (but not the plan participants or government pension plans).
- Individual retirement accounts and other assets that may be deemed subject to ERISA requirements
- Other investment advisors.

Minimum Account Size

The minimum asset requirement for new wealth management clients is \$500,000. LotusGroup Advisors can make an exception to the minimum asset requirement at its sole discretion.

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

Analysis & Strategies

LotusGroup Advisors maintains a list of investable asset classes and preferred investment product(s) within these asset classes. This list is continually refined as market conditions change and new products become available. Such investment products are evaluated continuously through a combination of independent analysis and purchased research, intending to find the lowest cost and best-performing options for clients; LGA does not receive commissions for selecting Fund A versus Fund B (this is done to maintain LGA independence, to act in the best interests of clients, and avoid conflicts of interest).

LotusGroup Advisors then provides clients with the following investment choices within their stated client grouping and risk profile, referencing the investable asset/product list described above:

- **Strategic Asset Allocation:** The Global Index portfolio aligns with the efficient market theory and is invested in a diversified portfolio where the assets are held and rebalanced periodically to keep allocations aligned with their strategy. The Global Rotation portfolio uses a similar approach. The portfolio is diversified and fully invested; however, it adds quantitative analysis to overweight or underweight asset classes relative to the Index model.
- **Tactical Asset Allocation:** Quantitative analysis using LotusGroup Advisors proprietary 5-forces methodology (Fuel, Valuation, Sentiment, Technical, Currency Effects) to develop investment targets for the various asset classes in each client's portfolio (e.g., x% of a client's portfolio to be invested in US-Large Cap Equity for Q2/2011). Investments that have historically exhibited higher returns and higher volatility will have larger targets in more aggressive portfolios. In contrast, lower returning / lower volatility investments will have larger targets in more conservative portfolios. Additionally, client

portfolios must be adjusted for the products available within their brokerage accounts (e.g., if x% is dedicated to Long-Short funds, and they do not exist in a client's limited 401K account, then this asset class is over-weighted in their unrestricted brokerage account(s)). As opposed to managers who develop their targets one time, LotusGroup Advisors conducts this analysis and makes investable changes quarterly (semi-annually for emerging clients).

- **Active Trading Services:** Utilization of various LotusGroup Advisors proprietary trading strategies to lock in profits and reduce or hedge against downturns. Active trading strategies include:
 - Technical value stops
 - Technical trailing stops
 - VXX short-term hedging model
 - NAV premium or discount model
- **Rebalancing:** Buying of investments that have declined below their % targets by a defined variance and selling investments that have risen above their % targets by a defined variance to rebalance the portfolio to its targeted levels, effectively buying low and selling high in a systematic manner.
- **Private Investments:** A rigorous sourcing process is used to identify, evaluate, and negotiate with private investment fund managers (General Partners or "GP"). Negotiations include investment terms and fees/costs and access to private placements for LGA clients (for example, negotiating underlying GP management fees from 2% down to 1.5% or negotiating investment minimums from \$250K down to \$100K). Once clients are invested, LGA maintains ongoing monitoring, surveillance, and management of each investment, including guidance to GPs on fund reserves, distributions, and exits.

Typical public market investments include ETFs, closed-end funds, open-ended funds, and individual company stocks across a broad base of different asset classes: US stocks, US bonds, Foreign stock, Foreign bonds, Emerging Markets, Raw Materials, Energy, Precious Metals, REITs, Currencies, Managed Futures, Long-Short Strategies, Absolute Return Strategies, Merger Arbitrage Strategies. Typical private investments include infrastructure holdings, real estate equity, real estate debt, private debt, special situations, litigation financing, life settlements, and private equity.

For public market investments, both fundamental and technical analyses are used to select individual positions. In contrast, volatility-determined price targets help determine entry and exit prices, lock in profits, and minimize losses. Fundamental analysis includes quantitative and qualitative analysis of economic, valuation, sentiment, and currency variables. In contrast, technical analysis predominantly consists of charting techniques to identify patterns and key price points for decision-making. Money management principles are then applied to limit the exposure of a client's portfolio to the effects of any single investment.

While LotusGroup Advisors works hard to maximize client returns within an acceptable level of volatility for each client, investing involves the risk of loss that clients should be prepared to bear. There is potential for a drag on performance for more active strategies due to increased transaction costs and taxes. LGA attempts to minimize this drag using commission-free and low-cost ETFs where the possible and intelligent placement of more actively traded investments within non-taxable retirement accounts.

Risks of Loss

LGA seeks investment strategies that do not involve significant or unusual risk beyond the general domestic and international equity markets. However, investing in securities, in general, involves a risk of loss. LGA's investment recommendations are subject to various market, currency, economic, political, and business risks, and such investment decisions are not always profitable. Clients should be aware that there could be a loss or depreciation of the client's account's value, which clients should be prepared to bear. There can be no assurance that the client's investment objectives will be obtained, and no inference to the contrary should be made. Clients are advised that they should only commit assets for management that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk. Consequently, the value of the client's account can, at any time, be worth more or less than the amount invested.

Principle Risks Involved in Investing May Include:

- **Stock Market Risk:** The market value of stocks will generally fluctuate with market conditions. While stocks have historically outperformed other asset classes over the long term, they tend to fluctuate over the short term due to factors affecting the individual companies, industries, or the securities market. The past performance of investments is no guarantee of future results.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before generating a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment.
- **Currency Risk:** Overseas investments are subject to fluctuations in the dollar's value against the investment's originating country's currency. This risk is also referred to as exchange rate risk.
- **Financial Risk:** Excessive borrowing to finance a business's operations increases the risk of profitability because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations can result in bankruptcy and declining market value.
- **Liquidity Risk:** Liquidity is the ability to convert an investment into cash readily. Assets are generally more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Political & Legislative Risk:** Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States or those that conduct a substantial amount of their business outside of the United States.
- **Emerging Market Risk:** The risk involved with investing in companies organized in emerging market nations. Investments in securities and instruments traded in developing or emerging markets or that provide exposure to such securities or markets can involve additional risks relating to political, economic, or regulatory conditions not associated with investments in U.S. securities and instruments or investments in more developed international markets. Such conditions may impact the ability to buy, sell, or otherwise transfer securities.
- **Reinvestment Risk:** This is the risk that future proceeds from investments will have to be reinvested at a potentially lower rate of return (i.e., interest rate). This risk primarily relates to fixed-income securities.
- **Alternative Asset Risk:** These assets may increase the risk of investment loss and be highly illiquid and not required to provide investors with periodic pricing or valuations. They may involve complex tax structures and delays in distributing important tax information and are not subject to the same regulatory requirements as mutual funds. Investors in these products are often charged high fees, which may offset any trading profits; investors may incur asset-based charges and expenses at the fund level and indirect fees, expenses, and asset-based compensation of investment funds in which these funds invest. In many cases, they include underlying investments that are not transparent and are known only to the investment manager. Alternative investment returns may fluctuate and are subject to market volatility; an investor's shares, when redeemed or sold, may be worth more or less than their original cost. An investor could lose all or a substantial amount of their investment. Alternative investment fund account managers often have total trading authority over their funds or accounts; using a single adviser applying (usually) similar trading programs could mean a lack of diversification and, consequently, higher risk. Managers typically seek absolute positive investment performance by targeting a specific range of performance and attempting to produce targeted returns irrespective of the stock market's underlying trends. There can be no assurances that a manager's strategy (hedging or otherwise) will be successful or that a manager will use these strategies concerning all or any portion of a portfolio. Please read the investment's Private Placement Memorandum and associated legal documents and consult your Financial Advisor, tax advisor, and legal counsel for a complete description of the risks associated with this type of investment.

- **Cybersecurity Risk:** In connection with the increased use of technologies such as the Internet and the dependence on computer systems to perform necessary business functions, the Fund can be susceptible to operational, information security, and related risks due to the possibility of cyber-attacks or other incidents. Cyber incidents can result from deliberate attacks or unintentional events. Cyber-attacks include but are not limited to infection by computer viruses or other malicious software code, gaining unauthorized access to systems, networks, or devices that are used to service the Fund's operations through hacking or other means to misappropriate assets or sensitive information, corrupt data, or causing operational disruption. Cybersecurity failures or breaches by the Fund's third-party service providers can cause interruptions and impact the service providers' and the Fund's business operations, potentially resulting in financial losses. The Fund can incur substantial costs to prevent or address cyber incidents in the future.
- **Pandemic and Global Health Crisis Risk:** The Firm may be susceptible to risks associated with a pandemic or similar global health crisis. Impacts on critical service providers may create delays in required reporting, make it difficult for LGA to obtain accurate account or other information from third parties, increase operations risks such as trade breaks, and may lead to delays in communication, documentation, and other critical aspects of the Firm's advisory services. These examples are meant to provide examples of potential impacts and LGA does not purport this list to be all inclusive.
- **Changes in Regulation & Enforcement; Litigation:** The businesses of LGA, as well as the financial services industry generally, are subject to extensive regulation, including periodic examinations, by governmental agencies and self-regulatory organizations or exchanges in the United States and foreign jurisdictions in which they operate. These relate to, among other things, antitrust law, anti-money laundering laws, anti-bribery laws, laws about foreign officials, privacy laws concerning client information, and the regulatory oversight of the trading and other investment activities of alternative asset management funds and their investment advisers, including the Funds and LGA. Each regulatory body with authority over the Funds and LGA has the regulatory powers dealing with many aspects of financial services, including the authority to grant. In specific circumstances, it can cancel permissions to carry on particular activities. Any failure to comply with these rules and regulations could expose the Fund or LGA to liability or other risks.

*Past performance is not a guarantee of future returns.
Investing involves a risk of loss that you, as a client, should be prepared to bear.*

Item 9: Disciplinary Information

Registered investment advisers such as LGA are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client or prospective client's evaluation of LGA or its management's integrity. LGA does not have any such legal or disciplinary events in its history and, therefore, has no information to disclose concerning this item. LotusGroup Advisors and its Investment Advisor Representatives possess a clean legal and disciplinary record (i.e., no criminal or civil actions, no administrative proceedings before the SEC or any state regulatory agency, or proceedings before a self-regulatory organization). There may be items contained on www.brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider when evaluating your advisor's background.

Item 10: Other Financial Industry Activities & Affiliations

LotusGroup Advisors uses third-party party resources to help run its business and provide services to Clients, most

of which are back-office related. The two third-party resources used are Envestnet Tamarac ("Tamarac") and Noon Dalton. Tamarac provides daily custodial data downloading and reconciliation services on client accounts. Noon Dalton provides paperwork processing services, internal quality checks, and internal report generation to the Firm.

While LotusGroup Advisors has developed a network of professionals to help support client needs (e.g., accountants, lawyers, and insurance businesses), LotusGroup Advisors and its advisors never receive any compensation in return for such referrals. In doing so, LotusGroup Advisors sources these professionals with a focus on finding the highest value-add, lowest-cost providers to service its clients, acting in a client's best interest with fiduciary responsibility.

Related Parties

LotusGroup Capital, LLC

LotusGroup Advisors has a related party in the common-controlled firm, LotusGroup Capital, LLC ("LGC"). LotusGroup Capital's principal owners are Raphael A. Martorello, Managing Member (80.84%), Louis C. Frank, Partner, and Private Portfolio Manager (3.39%), Nicholas Pirnack, Partner (0.45%), Stephanie Schlemeyer, Partner (0.32%) and Quail Creek Production Corporation (15%).

LGC offers a specific advisory service; it manages a private investment fund and provides insurance services consulting to third-party life settlement investors and funds. Mr. Martorello formed and managed both the advisory firm LGC and the private investment fund it manages, LotusGroup Longevity Fund, LLC ("LLF"). LGC, a Delaware limited liability company launched on October 15, 2018, serves as the Managing Member, the Investment Manager, and the fiduciary of the LLF. As of September 2022, LGC has purchased LGA's private funds, LGA IncomePlus Fund L.P. ("IPF"), LotusGroup IncomePlus Fund II L.P. ("IPFII"), and LotusGroup IncomePlus Fund III, L.P. ("IPFIII"), and as of this date, LGC provides continuous investment advisory services for the newly acquired funds (each fund advised "Fund" and collectively the "Funds").

LGC's clients are LLF, IPF, IPFII, and IPFIII, to whom the Adviser provides discretionary advisory services. LGC's role is to perform the sourcing and management of individual investments and the various service providers to the Funds, which seeks to pool investment funds of its investors (for LLF, each a "Member," for IPF and IPFII, each a "Limited Partner") for the primary purpose of long-term capital appreciation and a secondary goal of generating income. LLF seeks to achieve its objective by investing primarily in a variety of life settlement contracts with Net Asset Value ("NAV") that increase over time, with potential sales of such contracts to generate gains and eventual maturities that produce realized gains/income to the Fund. IPF and IPFII seek to preserve capital by investing in recession-resilient sectors with low correlations to public markets & the economy. Hard assets back all investments, and most deliver attractive current yields ("Income") relative to fixed income options available in the public markets. Additional capital gains accrue upon investment exits ("Plus") for select investments within the Funds.

LGC, as the Adviser and Fund Manager, maintains the sole and complete authority to manage the Fund's activities and those of its affiliated Partner: LLF (Special Member), LLC, the Adviser's carried interest holding company. *(Please see Mr. Martorello's LGC Form ADV Part 2B – Brochure Supplement for additional details on his formal education, business background, and outside business activities.)*

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

According to Rule 204A-1 of the Investment Advisers Act of 1940, as amended ("Advisers Act"), LGA has adopted a written code of ethics ("Code of Ethics"), which is designed to address and avoid potential conflicts of interest and applies to all Covered Persons. The Code of Ethics may also be used by any other person designated by the LGA Chief Compliance Officer (the "CCO").

A full copy of the Code of Ethics will be made available to investors in each Fund upon written request.

LotusGroup Advisors has comprehensive Policies, Procedures, & Code of Ethics documents signed by all Covered Persons (employees) and is tracked by the Firm's CCO.

Suppose LotusGroup Advisors make a profit and gain from a trading error. In that case, the handling of such credits in the Error Account shall be distributed to the non-profit organization Minds Matter of Denver. Address: PO Box 48162, Denver, CO 80204. Tax ID: 20-1449487.

The LotusGroup Advisors Investment Team currently consists of Raphael A. Martorello, Stephanie L. Schlemeyer, Louis C. Frank, and Mr. Brian McAuliffe. Mr. Martorello actively makes investments/trades in securities on behalf of his portfolios, which may be like those made on behalf of LotusGroup Advisors clients. The Investment Team believes in its approach and, thus, employs those same strategies in its investments, slotting most of its public investments into the appropriate client category and risk profile described in 'Item 4' earlier in this document. All rules are followed for client portfolios and Mr. Martorello's portfolio to mitigate Mr. Martorello's conflict of interest, benefiting from combining his trade(s) in some unfair way with client trades. All capable orders are grouped into block trades, and clients receive the same execution price, except independent orders made during weekly rebalancing. When clients are rebalanced weekly, they are completed in alphabetical order of the last name, which neither intentionally benefits nor harms any particular client, as it is impossible ahead of time to predict whether a purchase or sale decision will improve or worsen throughout the time it takes to fulfill all the client rebalances on any given day.

Occasionally, Mr. Martorello takes small personal positions in more risky investments such as individual micro-cap stocks, options, and private investment opportunities (e.g., real estate projects, oil exploration interests, etc.), which tend to be inappropriate for client portfolios or investment objectives. Additionally, Mr. Martorello periodically tests new trading strategies with small amounts of money in his accounts to understand the real-life impact of those new investments or trading models. These early-stage research activities are inappropriate for LotusGroup Advisors' clients and are limited to Mr. Martorello's account. As new strategies are validated, they may be incorporated into client portfolios if deemed appropriate for helping to achieve their investment objectives.

Client trades and interests are always placed ahead of Mr. Martorello and never comingle a client sell with a personal buy and vice versa. Additionally, a preferred broker/custodian is utilized with each client, and this party is responsible for the effective execution of trades placed. Further details of how LGA mitigates conflicts of interest in personal investing/trading can be found in LGA's comprehensive Policies, Procedures, and Code of Ethics document described earlier in this section (specifically within our policies on Personal Securities Trading and Trading - Best Execution).

There may be instances in which a LotusGroup Advisors Client may inquire about or invest in one of the LotusGroup Capital Funds. In such instances, LotusGroup Advisors will maintain its fiduciary duty owed to the Client and will ensure that such an investment is suitable for the Client, disclose any and all applicable fees of such an investment, and discuss the nature of the affiliation between LGA and LGC. Typically, an LGA client will not pay the usual management fee to LGC for managing these assets. Thus, the client is not double charged for investing in an LGC product.

Quarterly, LGA's Chief Compliance Officer ("CCO") performs an Access Person Trading Review by reviewing every trade made by the firm and is evaluated against everyone on the LGA investment team and all Investment Advisor Representatives ("IAR") of the firm to ensure full compliance with trading policies and procedures, and that no conflicts have occurred. The LGA process is to alert the Chief Compliance Officer immediately if a conflict occurs. The CCO will determine the appropriate course of action. To date, no conflicts have been uncovered.

Item 12: Brokerage Practices

LotusGroup Advisors suggests that clients use a LotusGroup Advisors preferred Broker-Dealer for maintaining

funds under management with LotusGroup Advisors. Both retirement and non-retirement accounts are set up and kept for customers with the Broker-Dealer. LotusGroup Advisors strives to maintain consistent trading, reporting, and investment operations facilitated by a single Broker-Dealer usage.

The preferred Broker-Dealer was selected using the following criteria:

- Competitive trading commissions costs,
- Customer service levels,
- Reporting tools, including cost basis and 1099 reports facilitating tax management strategies,
- Personal money management tools
 - Electronic fund transfer capabilities
 - Dividend reinvestment programs
 - Electronic communication delivery capabilities
- Financial stability to ensure individual accounts, including primary and backup account insurance.

LotusGroup Advisors has chosen Charles Schwab & Co., Inc. (“Schwab”) as its preferred broker-dealer. LotusGroup Advisors has no affiliation with Schwab nor any compensation or other arrangements that may create a conflict of interest with this relationship. As a registered broker-dealer and a member of the Securities Investor Protection Corporation (SIPC), Schwab is subject to certain regulations intended to protect assets held in brokerage accounts maintained at Schwab. Schwab Advisor Services serves independent investment advisory firms like ours and includes the custody, trading, and support services of Charles Schwab & Co., Inc. Additionally, LotusGroup Advisors always endeavors to put its client’s interests first, in compliance with their fiduciary duties as a Registered Investment Advisor.

Other products or services assist LotusGroup Advisors in managing and administering client accounts not maintained at Schwab (e.g., 401Ks, 529s, Annuities, etc.). LGA chooses to offer a holistic approach to portfolio management of LGA clients so that the firm can assist in managing accounts not maintained at Schwab (e.g., 401Ks, 529s, Annuities, etc.). The firm’s position is that full client financial planning can be more comprehensive in offering such services. Consequently, these technologies and services are critical for LotusGroup Advisors to provide the services contracted for with clients. Furthermore, LGA has evaluated industry-wide brokerage services and fees despite the required disclosures above. LGA believes that Schwab offers exceptional total value for the commission charged on each transaction relative to the services it provides, as compared to its peers.

For 401K, 403B, 457, and 529 accounts under management, LotusGroup Advisors client accounts remain with their company or state-sponsored plan (e.g., Fidelity, Franklin, etc.). Still, the data is incorporated daily into the overall asset allocation model through a portfolio management tool and is also included in the client's quarterly performance report.

LotusGroup Advisors aggregates client orders (purchases or sales of securities) whenever possible to ensure the same pricing and fairness for all clients. The only time LGA may choose not to aggregate orders are if LGA has a full rebalance to complete for a client that includes a trade in which all other clients are participating. For example, if LGA is buying security x for all clients, and at the same time, a new client starts on the same day that requires all securities to be purchased, LGA may choose to use the portfolio management system to create all the trades necessary for this new client separately from the block trade for all other clients. However, as soon as this new client is balanced and in the system, all new client orders going forward will have this client aggregated with others in block trades.

Item 13: Review of Accounts

LotusGroup Advisor's investment team conducts quarterly or semi-annual reviews for significant asset allocation changes (described in Item 8). Intra-quarter, the investment team reviews accounts on a weekly or monthly schedule

for rebalancing purposes. The products dictate the frequency of reviews in a client's portfolio and each trade's average size. For example, LotusGroup Advisors uses no-transaction-fee mutual funds for smaller clients since their average trade size is small, and a regular \$7.99 ETF trade would hurt their performance. However, these mutual funds tend to have 30-day holding rules for buying and selling, so LotusGroup Advisors cannot review them more often than monthly. Larger clients use low-cost ETFs and can be reviewed more frequently; therefore, LotusGroup Advisors reviews them weekly or daily if the market is highly turbulent and/or an opportunity arises to take a quick profit or buy back in at a low cost.

LotusGroup Advisors also tracks the clients' positions daily to evaluate if they are overheated or breaking down. LotusGroup Advisors investment team charts all client positions monthly and establishes upside (overheating) and downside (breaking down) price targets. LotusGroup Advisors then downloads data daily to compare the current price to the price targets. As price targets are realized, the LotusGroup Advisors investment team makes decisions on the affected products and decides whether to take action on clients that hold this position.

Investment Review & Portfolio Adjustment:

- Quarterly/Semi-Annually - Major Asset Allocation Adjustments
- Weekly/Monthly - Rebalancing
- Monthly - Client Account Review to Confirm Appropriate Client Grouping (Described in Item 4)
- Daily - Individual Position Monitoring for Upside & Downside Price Targets

Private Client Advisors offer to conduct a minimum of one formal client review per year, go over client objectives, results from the previous year and since inception, risk profiles, new considerations for the upcoming year, and other relevant factors. Clients are also encouraged to contact advisors if there are any material items to be discussed before the more formal annual review. LGA advisors schedule monthly client reminders (e.g., quarterly gain/loss reports for business owners, savings reminders, etc.). Finally, some clients request a specific analysis from advisors to help them with financial planning, goal-tracking, scenario analysis, college savings, diversification, insurance reviews, private investment opinions, etc. These requests are handled ad-hoc and are put into a calendar to track on an ongoing basis (e.g., the client agrees to sit down bi-annually to review the savings plan and goal tracker with the advisor). Where possible, advisors are proactive with identifying when a client will have a particular need (e.g., when a client's family has a first child, it triggers a request from an advisor to discuss financial planning, goal-tracking, college savings, and term life insurance considerations). There is no additional charge for these client reviews and analyses, as they are considered part of providing exceptional service to the client.

Clients receive the following reports:

- LotusGroup Advisors preferred broker-dealer, Schwab, provides monthly account statements, trade confirmations, investor notifications, and year-end tax reports.
- LotusGroup Advisors provides quarterly performance reports with since-inception, quarter-to-date, and year-to-date statistics (all reported net of fees). These reports are generated automatically from the Portfolio Management System.
- LotusGroup Advisors provides clients with newsletters in the form of a blog post.

Item 14: Client Referrals & Other Compensation

LotusGroup Advisors restricts the practice of kickbacks or payments from third parties to LotusGroup Advisors for utilization of their investment products or advice with clients. While others may practice this endeavor, LGA believes it creates an insurmountable conflict of interest in providing advice and service to clients. LotusGroup Advisors does not accept compensation for using a 3rd party investment product with clients and is proud to remain 100% independent and aligned with the client's best interest, consistently searching for the best investments at the lowest costs.

LotusGroup Advisors may choose to engage in a Solicitor's Agreement with Solicitors to pay fees for client referrals. Solicitors serve as independent contractors and not as employees of LotusGroup Advisors. Solicitors solicit and refer clients to LotusGroup Advisors as individuals or entities suitable and appropriate for the investment advisory services provided by LotusGroup Advisors.

Solicitors do not have any authority to accept any client(s) on behalf of LotusGroup Advisors. LotusGroup Advisors does not have any responsibility to take any prospective client referred by a Solicitor. The solicitation services may also include impersonal advisory services, which include: (i) written materials or oral statements that do not purport to meet the objectives or needs of the specific client, (ii) statistical information containing no expressions of opinions as to the investment merits of particular securities, and (iii) regular contact, if requested or appropriate, to assist the Solicited Client in understanding the advisory services of LotusGroup Advisors and obtaining or updating client information on behalf of LotusGroup Advisors. Any specific client advice will be delivered to the Solicited Client by LotusGroup Advisors, and LotusGroup Advisors shall provide any formal financial planning for the Solicited Client.

Solicitor Payout comes out of the Client Fee; it is not in addition to the Client Fee, and as such, clients do not pay a higher fee than if they had contracted directly with LotusGroup Advisors. Generally, Solicitor payouts range from 0 – 30% of collected client fees.

At this time, LGA does not have any solicitors in place.

Item 15: Custody

LotusGroup does not accept or permit the firm or its Associates to obtain custody of client assets, including cash and securities, acting as a trustee, or providing bill-paying service. However, the exception is that advisors gain password access to "held away" accounts such as 401K, 403b, 529 plans, and the like, which Schwab does not hold. This allows advisors to manage an entire portfolio holistically. In these instances, a client would complete a Limited Power of Attorney ("LPOA"), providing the firm with credentials to make trades on behalf of the client and align with their goals and the limitations of such account types.

The Adviser will not take title to any assets or have the authority to withdraw funds from the client's Accounts *except to cover payment of the agreed* Advisory Management Fees specified within the client's Advisory Services Agreement or at the client's specific and written direction. All checks or wire transfers to fund client Accounts must be made out to/sent to the client's Custodian. The Firm undergoes an annual Surprise Custody Examination with a PCAOB to review further and audit transactions of a randomly selected sample and produces a management assertion letter that is filed as an ADV-E per federal guidelines.

Regardless of the above, under federal regulations, LotusGroup Advisors is deemed to have custody of client assets if a client authorizes the Adviser to instruct the Custodian to deduct the Adviser's Management Fees from their account directly. Concerning such transactions, LotusGroup observes the following points noted in the SEC's No-Action Letter dated February 21, 2017, for any Advisory Fee debited directly from a client's Custodial Account.

For client Accounts in which LotusGroup directly debits Advisory Fees:

- The client will provide written instructions to their Custodian, which includes the client's signature, LotusGroup's name, and either the Adviser's address or their account number at the Custodian to which the transfer should be directed.
- The client will authorize their Custodian, in writing, to direct transfers to LotusGroup, either on a specified schedule or from time to time.
- The Custodian will appropriately verify the instruction, such as a signature review or other method to

verify the client's authorization, and promptly provide a transfer of funds notice to the client after each transfer.

- The client terminates or changes the instruction to their Custodian at any time.
- LotusGroup has no authority or ability to designate or change the identity of the client's instruction.
- LotusGroup will maintain records showing they are not a related party to the client's Custodian.
- The Custodian will be asked to send the client, in writing, an initial notice confirming the above instruction and an annual notice reconfirming the instruction.

The Custodian will maintain actual custody of the client's assets. The client will provide the above written limited authorization instructions directly to their Custodian and request the Custodian provide a "transfer of funds" notice to them at their address of record after each Advisory Fee payment transfer occurs. The client will give these instructions either on the qualified Custodian's form or separately.

Clients will receive account statements directly from the Custodian to the email or postal mailing address of record, which the client provided to the Custodian. They will also receive at least quarterly statements from their Custodian reflecting all disbursements for the account, including the amounts of any assessed advisory fees. Clients should review statements provided by their Custodian promptly upon receipt. LotusGroup urges clients to compare the statements they receive directly from their custodian with the information outlined in any reports or periodic portfolio statements received from the adviser to ensure the accuracy of all account transactions. The reports received from LotusGroup may vary from Custodial statements based on Accounting procedures, reporting dates, or valuation methodologies of individual securities. LotusGroup encourages clients to promptly raise any questions with us about the custody, safety, or security of their assets.

As per an SEC Q&A guidance issued on May 20, 2010, and the Colorado Division of Securities Rule 51- 4.10(IA).A.1, LotusGroup Advisors does not have custody of non-Schwab accounts (e.g., 401Ks, 529s, 403Bs, annuities) because fees are not directly deducted from these accounts, it has not inadvertently received physical securities, there are no employees who serve as trustee to a client, LGA cannot withdraw funds or securities based on advisor's instructions and e) LGA cannot transfer funds or securities into an un-like named account or unqualified custodian. As with Schwab accounts, LGA encourages clients to compare monthly/quarterly statements from the broker-dealers on these accounts to LotusGroup Advisors' quarterly reports, ensuring accurate account balance, beneficiary, and address information. LotusGroup Advisors also undergo a surprise audit from a certified 3rd party for these "held-away" accounts.

LotusGroup Advisors accepts 3rd party checks from Schwab client accounts only when prior written approval is received from the client by Schwab. Any 3rd party checks received by LotusGroup Advisors are logged appropriately and sent to the 3rd party within 24 hours of accepting checks.

Item 16: Investment Discretion

LotusGroup Advisor's clients sign a full trading authorization agreement through the preferred Broker/Dealer. Clients also sign a limited power of attorney for 401K, 403B, 457, and 529 accounts held at an alternative broker chosen by their plan sponsor. LotusGroup Advisors has the discretion to select, buy, sell, and determine the quantities of the individual positions for each client account. LotusGroup Advisors is only required to maintain or solicit customers' consent for trades made on positions explicitly discussed during the introductory interview (e.g., inherited stock that the client would like to hold on to for sentimental reasons, etc.).

If a client objects to any investment decision, they may discuss this with LotusGroup Advisors, and a mutually agreed-upon decision will be made and documented if necessary. It is always preferred that the client and LotusGroup Advisors engage in discussions to resolve any potential differences in opinion. However, suppose the client repeatedly acts inconsistently with the mutually agreed-upon investment objectives. In that case, LotusGroup Advisors reserves

the right to cancel the customer agreement after providing written counsel to the customer. Similarly, the customer reserves the right to cancel their contract with LotusGroup Advisors at any time if they so desire. Regarding private investment programs, clients have full discretion in making choices of which investments to participate in or not.

Item 17: Voting Client Securities

LotusGroup Advisors do not participate in proxy voting. If required, LotusGroup Advisors would choose to vote along with board decisions of the underlying security. Clients have the option in their new account setup forms with Schwab to determine whether they would like LotusGroup Advisors to vote for proxies on their behalf. The adviser would instruct the client not to select that option, as the adviser does not vote for proxies on the client's behalf. LotusGroup Advisors uses a tactical asset allocation model that trades frequently and typically invests greater than 90% of ETFs or mutual funds (less than 10% in individual securities). When a material item arises on a proxy for which LotusGroup Advisors continues to hold the client's investment position, it is an infrequent occasion.

Consequently, LotusGroup Advisors does not vote proxies but instead focuses on asset selection and allocation amounts on an ongoing basis. If LotusGroup Advisors strongly disagrees with the management of a particular investment, LotusGroup Advisors, more often than not, would sell the position rather than stick around and vote for the proxy.

On the rare occasion where LotusGroup Advisors is solicited through a phone conversation by a voting proxy company, LotusGroup Advisors would choose to abstain or vote alongside the board. Again, LotusGroup Advisors decides to sell as the tool of choice if there is disagreement with the fund or management decisions/operations when applicable.

If a client requests a track record for proxy voting, LotusGroup Advisors is happy to provide them with the policy and procedures and provide them with their description as needed. However, LotusGroup Advisors does not vote for proxies. This eliminates conflicts of interest in the decision-making process. If a client is solicited for their proxy vote, they can direct their vote as per the solicitor's request and directly to the party indicated by the solicitor.

Item 18: Financial Information

Since its inception in early 2007, LotusGroup Advisors has been, and continues to be, on solid financial grounds and has no current condition that would impair LGA's abilities to meet client commitments. LotusGroup Advisors is 100% self-funded with no debts or outside funding. A balance sheet is not required to be provided as LGA (i) does not solicit fees more than six months in advance; (ii) does not have a financial condition that is likely to impair its ability to meet contractual commitments to clients; and (iii) has not been subject to any bankruptcy proceeding during the past ten years.

No member of management, an officer, or a principal of the Adviser has been involved in an award or otherwise found liable in an arbitration claim alleging damages over \$2,500 in an activity involving investment or investment-related business; fraud, false statements, or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; dishonest, unfair, or unethical practices. Further, no member of management, an officer, or a principal of the Adviser has been found liable in a civil, self-regulatory organization or administrative proceeding involving investment or investment-related activity; fraud, false statements, or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; dishonest, unfair, or unethical practices.



Investment Advisor Representative

RAPHAEL A. MARTORELLO

(Individual CRD # 4768833)

1005 South Gaylord St.

Denver, CO 80209

Email: info@lgadvisors.com

Website: www.lgadvisors.com

Phone: 415.793.8041

Fax: 815.572.0566

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The information provided in this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States or by the SEC. Nothing in this document is to be construed as an offer of securities; please refer to actual fund and investment offering documents for more complete disclosures. Registration of an Investment Advisor does not imply any level of skill or training; investments involve risk, including the possible loss of principal. The oral and written communications of an Adviser provide you with information you may use to determine whether to hire or retain the Adviser.

This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO Amanda N. Cohen directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or have any questions about the contents of this Brochure Supplement.

Additional information about Raphael A. Martorello is available on the SEC's website at www.adviserinfo.sec.gov.

(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

RAPHAEL A. MARTORELLO

Date of Birth & Educational Background

Raphael A. Martorello was born in 1974. He received his bachelor's degree in Mechanical Engineering and a minor in Economics from The University of Virginia in 1997. Mr. Martorello has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA) or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

- | | |
|--------------------|---|
| 01/2007 to Present | LotusGroup Advisors, LLC , Denver, CO
Principal, Owner, Managing Partner & Investment Advisor Representative <ul style="list-style-type: none">- Manages the LGA Management Team- Sources & invests in private placement opportunities |
| 09/2018 to Present | LotusGroup Capital, LLC , Denver, CO
Principal, Owner, Managing Member & Investment Advisor Representative <ul style="list-style-type: none">- Manages the LGC team & is a Portfolio Manager of the LotusGroup Longevity Fund, LLC, LGA IncomePlus Fund, LP, and the LotusGroup IncomePlus Fund II, LP- Sources & invests in private placement opportunities |
| 03/2004 to Present | Martorello Money Management , Denver, CO
Partner, Advisor & Investment Advisor Representative <ul style="list-style-type: none">- Commercial Investment Experience- Total Investment Experience & Systems Development- Client Service Experience- Operations Experience- Management Experience |
| 03/2000 to 03/2006 | ICG Commerce , King of Prussia, PA
Director <ul style="list-style-type: none">- Practice Responsibility (All-West Coast Clients)- Management Oversight (20 Employees)- Business Process Outsourcing |
| 08/1997 to 04/2000 | A.T. Kearney , New York, NY
NY Associate <ul style="list-style-type: none">- Management & Business Consulting |

Professional Designations, Licensing & Exams

Raphael A. Martorello does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Raphael A. Martorello, providing advice to you. Mr. Martorello does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may

be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Raphael A. Martorello is a Principal, Owner, Managing Partner, and an Investment Advisor Representative of LotusGroup Advisors. He dedicates 50% of his time to this activity during trading hours. Outside of his activities at LotusGroup Advisors, Mr. Martorello also participates in the following investment-related other business activities:

Name of Outside Business or Organization: LotusGroup Capital, Inc.

Address: 1005 South Gaylord Street, Denver, CO 80209

Title: Principal, Owner, Managing Partner & Investment Advisor Representative

Description of Outside Business or Organization: Affiliated Registered Investment Advisory firm

Description of Duties or Responsibilities: Providing management & investment strategy to leverage research provided to LotusGroup Advisors, LLC and Martorello Holdings, LLC

Start Date: 11/2018

Hours Devoted to OBA Monthly: 75% during trading hrs./75% during non-trading hrs.

Name of Outside Business or Organization: Martorello Holdings, LLC

Address: 1043 S. Vine Street, Denver, CO 80209

Title: Member

Description of Outside Business or Organization: Holding company for commercial real estate investment, developing the new HQ office for LotusGroup Advisors & LotusGroup Capital in Denver, CO

Description of Duties or Responsibilities: Establishing financing & interacting with the Project Manager, as needed.

Start Date: 01/2018

Hours Devoted to OBA Monthly: 0 during trading hrs./1 hour weekly during non-trading hrs.

Name of Outside Business or Organization: Thrive Workplace at LoDo, LLC/Thrive Workplace

Address: 201 Milwaukee Street, Suite 200, Denver, CO, 80209

Title: Member, Board of Directors & L.P. Investor

Description of Outside Business or Organization: Co-working Business

Description of Duties or Responsibilities: Conducting quarterly meetings to review progress & provide advice.

Start Date: 12/2013

Hours Devoted to OBA Monthly: 0 during trading hours, 2 hours quarterly, and non-trading hours.

Name of Outside Business or Organization: Martorello Money Management

Address: 1005 South Gaylord Street, Denver, CO 80209

Title: Partner

Description of Outside Business or Organization: Before 2016, this was an independent Registered Investment Advisor. In January 2016, this organization transitioned all clients into LotusGroup Advisors as part of a business merger. Through the buy-sell transaction, this business was required to de-register as an RIA but to stay open for the flow of funds on a financial consulting base, to pay Raphael A. Martorello's fixed salary & for the business to provide funding back to LotusGroup Advisors for benefits reimbursements.

Description of Duties or Responsibilities: Predominantly administrative within the business and paid to be the Managing Partner of LotusGroup Advisors as a contractor through this business.

Start Date: 04/2004

Hours Devoted to OBA Monthly: 0 during trading hrs./1 hour per week during non-trading hrs. (All hours counted at LotusGroup Advisors are technically Martorello Money Management hours since Mr. Martorello's salary is paid as a contractor through Martorello Money Management).

Mr. Martorello's outside business activities do not give him an incentive to recommend investment products based on anything other than a client's needs. Nevertheless, the potential for receipt of commissions and other compensation can create a conflict of interest. It can provide an incentive for him to recommend products based on the compensation received rather than on the client's needs. LotusGroup Advisors address this conflict of interest by requiring him to disclose such relationships to clients. Mr. Martorello satisfies this requirement by advising clients of the nature of transactions or associations, his role, and any compensation he received at the time of the relationship's inception. Mr. Martorello acts in the best interest of clients. Clients are always in no way required to utilize the services of an Investment Advisor Representative of LotusGroup Advisors in connection with such individual's activities outside of LotusGroup Advisors.

Additional Compensation

The firm's advisors earn a base salary, with most earnings coming from an earned percentage of revenue share collected from client assets managed by the Adviser. Additionally, Mr. Martorello may earn an annual bonus for growing the overall business. Mr. Martorello passively invests in other private businesses, including golf courses, oil exploration, real estate, and private offerings that LGA sources on behalf of clients. Outside of those disclosed herein, he does not receive any additional compensation or economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors.

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Mr. Martorello directly supervises the LotusGroup Management Team and collaborates on trade and investment decision activity with Ms. Schlemeyer. Raphael A. Martorello is self-supervised as it pertains to client service, investment strategy development, and execution. He is audited by the Firm's CCO every quarter through LotusGroup's "Access Person Review" to ensure all personal trades have not benefited at the expense of client trades.

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to them). LotusGroup Advisors require all Associates to exercise a fiduciary duty to clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Raphael A. Martorello has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Raphael A. Martorello has not been the subject of a bankruptcy petition.



Investment Advisor Representative

NICHOLAS S. PIRNACK, CEPA

(Individual CRD #5717464)

1005 South Gaylord St.

Denver, CO 80209

Email: info@lgadvisors.com

Website: www.lgadvisors.com

Phone: 720.325.2327

Fax: 815.572.0566

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The information provided in this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States or by the SEC. Nothing in this document is to be construed as an offer of securities; please refer to actual fund and investment offering documents for more complete disclosures. Registration of an Investment Advisor does not imply any level of skill or training; investments involve risk, including the possible loss of principal. The oral and written communications of an Adviser provide you with information you may use to determine whether to hire or retain an Adviser.

This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Nicholas S. Pirnack is available on the SEC's website at

www.adviserinfo.sec.gov.

(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

NICHOLAS S. PIRNACK, CEPA

Date of Birth & Educational Background

Nicholas S. Pirnack was born in 1985. He received his B.A. Economics/Minor in Business from Colorado State University in 2009. Mr. Pirnack has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA), or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles. Mr. Pirnack earned his Certified Exit Planning Advisor ("CEPA") in February 2023.

Business Background & Experience

- | | |
|--------------------|--|
| 10/2011 to Present | LotusGroup Advisors, LLC , Denver, CO
Partner, Senior Advisor & Investment Advisor Representative <ul style="list-style-type: none">– Over ten years of total client management experience– Current oversight of Advising Team for the firm |
| 08/2009 to 10/2011 | Intersecurities , Fort Collins, CO
Investment Advisor Representative <ul style="list-style-type: none">– Client relationship management– Oversight of 2 advisors |
| 04/2009 to 10/2011 | CORE Financial/Transamerica , Fort Collins, CO
Financial Advisor & Insurance Agent |

Professional Designations, Licensing & Exams

Nicholas S. Pirnack earned his Certified Exit Planning Advisor ("CEPA") professional designation, in 2023.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Nicholas S. Pirnack, providing advice to you. Mr. Pirnack does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Nicholas S. Pirnack is a Senior Advisor and Investment Advisor Representative who provides advice directly to clients; he does not trade or make investment decisions. Mr. Pirnack dedicates 100% of his time to this activity during trading hours. Outside of his activities at LotusGroup Advisors, Mr. Pirnack also participates in the following investment-related other business activities:

Name of Outside Business or Organization: Denver Children's Foundation

Address: 8275 E 11th Ave #202684, Denver, CO 80220

Title: Board Director

Description of Outside Business or Organization: For the past three decades from its roots as Denver Active 20-30, the Denver Children's Foundation (DCF) has been changing the trajectories of children in Colorado through financial grants to organizations that directly support at-risk, disadvantaged children in our community. **Description of Duties or Responsibilities:** Serving a 1-year Director term in 2021-2022 after a 2-year term from 2019-2021, bringing strong expertise in event fundraising and organizational leadership.

Start Date: 04/2004

Hours Devoted to OBA Monthly: 0 during trading hrs./5 hour per week during non-trading hrs.

Additional Compensation

The firm's advisors earn a base salary, with most earnings coming from an earned percentage of revenue share collected from client assets managed by the advisor. Additionally, they may earn an annual bonus for meeting goals set forth by the company. In addition, advisors can earn a percentage of the management fee collected from IncomePlus Fund Class B investors to whom they provide investor relations assistance. Mr. Pirnack does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors. Mr. Pirnack may earn up to \$1500 for each Business Valuation that he completes on behalf of LotusGroup Advisors. Mr. Pirnack does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors.

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Mr. Pirnack is directly supervised by Raphael A. Martorello (T: 720.593.9861), who oversees the advisory activities of all LotusGroup Investment Advisor Representatives

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to it). LotusGroup Advisors require all Associates to exercise a fiduciary duty to its clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

- A. Nicholas S. Pirnack has not been involved in any of the events listed below.
 - 1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
 - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
- B. Nicholas S. Pirnack has not been the subject of a bankruptcy petition.



Investment Advisor Representative

STEPHANIE L. SCHLEMEYER

(CRD #5795426)

1005 South Gaylord St.

Denver, CO 80209

Email: info@lgadvisors.com

Website: www.lgadvisors.com

Phone: 720.897.8553

Fax: 815.572.0566

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

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This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Stephanie L. Schlemeyer is available on the SEC's website at www.adviserinfo.sec.gov.

(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

STEPHANIE L. SCHLEMEYER

Date of Birth & Educational Background

Stephanie L. Schlemeyer was born in 1989. She received her B.A. Mathematics from Messiah College in 2011. Ms. Schlemeyer has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA) or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

- | | |
|--------------------|--|
| 01/2018 to Present | LotusGroup Advisors, LLC , Denver, CO
Partner, Product Manager & Investment Advisor Representative <ul style="list-style-type: none">- Manage product toolset such as portfolio management system & reporting- Strategy development & management for public investment models- Public market research- Investment Committee Member on LGA IncomePlus Fund |
| 02/2014 to 12/2018 | LotusGroup Advisors, LLC , Denver, CO
Senior Analyst, Portfolio Manager & Investment Advisor Representative <ul style="list-style-type: none">- Manage investment models- Execute LotusGroup Advisors portfolio strategies- Conduct & assist with primary research on new public investment opportunities & strategies- Investment Advisor Representative |
| 08/2011 to 01/2014 | University of Colorado , Denver, CO
CO Data Manager <ul style="list-style-type: none">- Perform quality assurance tests on the data to maintain the integrity of the data & evaluate the progress of the programs at the individual grantee sites- Create & edit existing standard operating procedures- Data analysis & report writing for various projects |

Professional Designations, Licensing & Exams

Stephanie L. Schlemeyer does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Stephanie L. Schlemeyer, providing advice to you. Ms. Schlemeyer does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Stephanie L. Schlemeyer is a Product Manager who leads the selection and implementation of LotusGroup's portfolio management systems, collaborates on investment decisions, and executes trades on behalf of clients as a backup to Louis C. Frank, LotusGroup's Portfolio & Private Partner Manager, when he is unavailable. Ms. Schlemeyer dedicates 100% of her time to this activity during trading hours. Outside of her activities at LotusGroup, Ms. Schlemeyer has

no other investment-related, other business activities to disclose.

Additional Compensation

The product manager earns a base salary, with some earnings coming from a percentage of revenue share collected from client assets managed. Additionally, Ms. Schlemeyer can earn an annual bonus for meeting goals set forth by the company. Ms. Schlemeyer does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Stephanie L. Schlemeyer is directly supervised by Raphael A. Martorello (T: 720.593.9861), who oversees all LotusGroup Investment Advisor Representatives' advisory activities.

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to them). LotusGroup Advisors require all Associates to exercise a fiduciary duty to its clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Stephanie L. Schlemeyer has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Stephanie L. Schlemeyer has not been the subject of a bankruptcy petition.



Investment Advisor Representative

MATTHEW J. WOOLBRIGHT
(CRD #6837211)

*1005 South Gaylord St.
Denver, CO 80209
Email: info@lgadvisors.com
Website: www.lgadvisors.com
Phone: 361.834.6181
Fax: 815.572.0566*

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

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This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Matthew J. Woolbright is available on the SEC’s website at www.adviserinfo.sec.gov.
(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

MATTHEW J. WOOLBRIGHT

Date of Birth & Educational Background

Matthew J. Woolbright was born in 1990. He received his Bachelor of Science in Sociology from Texas A & M University in 2012. Mr. Woolbright has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA), or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

10/2017 to Present	LotusGroup Advisors, LLC , Denver, CO Investment Advisor Representative
08/2014 to 10/2017	Corpus Christi Caller-Times , Corpus Christi, TX Reporter
08/2013 to 08/2014	Juneau Empire , Juneau, AK Reporter
02/2013 to 07/2013	Assoc. Press , York City, NY Reporter

Professional Designations, Licensing & Exams

Matthew J. Woolbright does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Matthew J. Woolbright, providing advice to you. Mr. Woolbright does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may be items contained on www.brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Matthew J. Woolbright is a Lead Private Client Advisor who provides advice directly to clients; he does not trade or make investment decisions. Mr. Woolbright dedicates 100% of his time to this activity during trading hours. Outside of his activities at LotusGroup, Mr. Woolbright has the following investment-related, other business activities to disclose:

Name of Outside Business or Organization: Bermuda Holdings Address: 8102 Radcliff Drive, Colorado Springs, CO 80920

Title: Managing Member

Description of Outside Business or Organization: There are two arms; both are tied to data reselling. One side focuses on political campaigns, advocacy, and volunteer organization; the other focuses on commercial advertising and micro-targeting.

Description of Duties or Responsibilities: Provide oversight to a team that does the day-to-day work and interacts with prospective clients on both sides.

Start Date: 08/2022

Hours Devoted to OBA Monthly: Approximately 7 hours per month, none during trading hours.

Mr. Woolbright's outside business activities do not give him an incentive to recommend investment products based on anything other than a client's needs. Nevertheless, the potential for receipt of commissions and other compensation can create a conflict of interest. It can provide an incentive for him to recommend products based on the compensation received rather than on the client's needs. LotusGroup Advisors address this conflict of interest by requiring him to disclose such relationships to clients. Mr. Woolbright satisfies this requirement by advising clients of the nature of transactions or associations, his role, and any compensation to be received by him at the time of relationship inception.

Mr. Woolbright acts in the best interest of clients. Clients are always in no way required to utilize the services of any Investment Advisor Representative of LotusGroup Advisors in connection with such individual's activities outside of LotusGroup Advisors.

Additional Compensation

The firm's advisors earn a base salary, with most earnings coming from an earned percentage of revenue share collected from client assets managed by the advisor. Additionally, an advisor can make a one-time commission for the new clients brought to the firm, paid quarterly on collected payments, and may earn an annual bonus for meeting goals set forth by the company. In addition, advisors can earn a percentage of the management fee collected from IncomePlus Fund Class B investors to whom they provide investor relations assistance. Mr. Woolbright does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors.

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Matthew J. Woolbright is directly supervised by Nicholas E. Pirnack, Senior Advisor (T: 720.593.9861).

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to it). LotusGroup Advisors require all Associates to exercise a fiduciary duty to its clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Matthew J. Woolbright has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

B. Matthew J. Woolbright has not been the subject of a bankruptcy petition.



Investment Advisor Representative:

LOUIS C. FRANK

(CRD #6613018)

1005 South Gaylord Street

Denver, CO 80209

Email: info@lgadvisors.com

Website: www.lgadvisors.com

Phone: 720.744.0958

Fax: 815.572.0566

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

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This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Louis C. Frank is available on the SEC's website at www.adviserinfo.sec.gov.
(Click on the link, select “Investment Advisor – Individual” and type in the above Individual CRD #.)

LOUIS C. FRANK

Date of Birth & Educational Background

Louis C. Frank was born in 1993. He received his Bachelor of Science in Business Administration Finance from the University of Arkansas in 2016. Mr. Frank has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA), or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

- | | |
|--------------------|---|
| 09/2018 to Present | LotusGroup Capital, LLC, Denver, CO
Partner, Portfolio & Private Partner Manager, Investment Advisor Representative <ul style="list-style-type: none">- Conducts private investment partner due diligence- Negotiates strategic terms and finalizes contracts/relationships- Maintains ongoing relationship management with private partners- Participates in authoring company investment blogs- Conducts industry research- Works with LGC's Portfolio Managers to execute strategies, document processes, and train future employees of the funds |
| 07/2017 to Present | LotusGroup Advisers, LLC, Denver, CO
Portfolio & Private Partner Manager, Investment Advisor Representative <ul style="list-style-type: none">- Serves on the LGA IncomePlus Fund Investment Committee- Execute on public investment models and portfolio management- Conduct and assist with primary research on new public investment opportunities and strategies- Provides ongoing relationship and supplier management with private investment partners- Participates in authoring LGA investment blogs- Registered as an Investment Advisor Representative |
| 06/2016 to 05/2017 | Fortis Asset Management, Denver, CO
Analyst |

Professional Designations, Licensing & Exams

Louis C. Frank does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisers, LLC, is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Louis C. Frank providing advice to you. Louis C. Frank does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. Further, there may be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your assessment of your Advisor's background.

Other Business Activities

Louis C. Frank is a Portfolio & Private Partner Manager and Investment Advisor Representative of LotusGroup Advisers. He dedicates 50% of his time to this activity during trading hours and 50% of his time during non-trading

hours. In addition to the above, Mr. Frank has the following other investment-related business activities to report:

Name of Outside Business or Organization: LotusGroup Capital **Address:** 1005 South Gaylord Street, Denver, CO 80209

Title: Portfolio & Private Partner Manager, Investment Advisor Representative

Description of Outside Business or Organization: Affiliated Registered Investment Advisory firm.

Description of Duties or Responsibilities: Conducts private investment partner due diligence, negotiates strategic terms & finalizes contracts/relationships, maintains ongoing relationship management with private partners, participates in authoring company investment blogs, conducts industry research & works with LGC's Portfolio Managers to execute strategies, document processes & train future employees of the funds.

Start Date: 07/2017

Hours Devoted to OBA Monthly: 50% during trading hrs. / 50% during non-trading hrs.

Name of Outside Business or Organization: Magnolia Holdings, LLC

Address: 2602 W. 24th Ave, Unit 2, Denver, CO 80211

Title: Managing Partner

Description of Outside Business or Organization: Magnolia Holdings is a joint business venture between Louis C. Frank and Walter Frank. The company was created to hold real estate assets purchased by its managing partners. Louis C. Frank is the managing partner of Magnolia Holdings, LLC, a holding company with 0 assets. He would receive 50% of all profits based on the business if any capital were deployed.

Description of Duties or Responsibilities: Providing operational oversight, analysis, and due diligence.

Start Date: 04/2017

Hours Devoted to OBA Monthly: 0 during trading hrs. / 1 hour per month during non-trading hrs.

Name of Outside Business or Organization: CFBW Partners, LLC

Address: 2602 W. 24th Ave, Unit 2, Denver, CO 80211

Title: Managing Partner

Description of Outside Business or Organization: LLC formed for assets to be managed by a Registered Investment Advisor. CFBW Partners does not have discretion over the affiliated brokerage account.

Description of Duties or Responsibilities: Providing operational oversight over the entity **Start Date:** 6/15/2020

Hours Devoted to OBA Monthly: 1 hour

Name of Outside Business or Organization: Seneca Capital Partners

Address: East Louisiana Avenue Denver, CO 80210

Title: Advisory Board Member

Description of Outside Business or Organization: Seneca Capital Partners is a Denver-based private equity firm

Description of Duties or Responsibilities: Work in an advisory capacity for the firm in respect to their private fund business.

Start Date: 7/2021

Hours Devoted to OBA Monthly: Less than one hour

Mr. Frank's outside business activities do not give him an incentive to recommend investment products based on anything other than a client's needs. Nevertheless, the potential for receipt of commissions and other compensation can create a conflict of interest. It can provide an incentive for him to recommend products based on the compensation received rather than on the client's needs. LotusGroup Advisors address this conflict of interest by requiring him to disclose such relationships to clients. Mr. Frank satisfies this requirement by advising clients of the nature of transactions or associations, his role, and any compensation to receive at the time of relationship inception. Mr. Frank acts in the best interest of clients. Clients are always in no way required to utilize the services of any

Investment Advisor Representative of LotusGroup Advisors in connection with such individual's activities outside of LotusGroup Advisors.

Additional Compensation

The portfolio & private partner manager earns a base salary, with some earnings coming from a percentage of revenue share collected from client assets managed. As an advisor, he earns a percentage of the revenue share collected from client assets managed by the advisor. Additionally, an advisor can make a one-time commission for the new clients brought to the firm, paid quarterly on collected payments, and may earn an annual bonus for meeting goals set forth by the company. In addition, advisors can earn a percentage of the management fee collected from IncomePlus Fund Class B investors to whom they provide investor relations assistance. Finally, he may earn a percentage of the incentive fee paid to the Firm from the IncomePlus Funds. Mr. Frank does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors.

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the efforts of the firm's Principal and Managing Partner, Raphael A. Martorello. Louis C. Frank is directly supervised by Stephanie L. Schlemeyer, Product Manager (T: 720.593.9861).

Covered Persons are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to it). LotusGroup Advisors requires all Covered Persons to exercise a fiduciary duty to its clients by acting in each client's best interest and by placing client interests first, *always*. Covered Persons are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Louis C. Frank has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Louis C. Frank has not been the subject of a bankruptcy petition.



Investment Advisor Representative:

DOUGLAS E. REESE

(CRD #1678299)

*1005 South Gaylord Street
Denver, CO 80209*

Email: info@lgadvisors.com

Website: www.lgadvisors.com

Phone: 303.601.7921

Fax: 815.572.0566

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The information provided in this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States or by the SEC. Nothing in this document is to be construed as an offer of securities; please refer to actual fund and investment offering documents for more complete disclosures. Registration of an Investment Advisor does not imply any level of skill or training; investments involve risk, including the possible loss of principal. The oral and written communications of an Adviser provide you with information you may use to determine whether to hire or retain an Adviser.

This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Douglas E. Reese is available on the SEC's website at www.adviserinfo.sec.gov.

(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

DOUGLAS E. REESE

Date of Birth & Educational Background

Douglas E. Reese was born in 1963. He received his BS in Finance and MBA in Finance/Investments from Western Illinois University in 1985. Mr. Reese has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA), or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

10/2017 to Present	LotusGroup Advisors, LLC , Denver, CO Private Client Advisor & Investment Advisor Representative
04/1991 to 03/2017	Wealth Associates, Inc. , Highlands Ranch, CO President

Professional Designations, Licensing & Exams

Douglas E. Reese does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Douglas E. Reese, providing advice to you. Mr. Reese does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Douglas E. Reese is a Private Client Advisor who provides advice directly to clients; he does not trade or make investment decisions. Mr. Reese dedicates 100% of his time to this activity during trading hours. Outside of his activities at LotusGroup, Mr. Reese has the following other business activities to disclose:

Name of Outside Business or Organization: Season of Wealth

Address: Private Residence (N/A)

Title: Business Consultant

Description of Outside Business or Organization: Advising on cash flow forecasting & monitoring.

Description of Duties or Responsibilities: Advising on cash flow forecasting & monitoring (no commissions are received from this business activity).

Start Date: 04/1991

Hours Devoted to OBA Monthly: 0% during trading hrs./10% during non-trading hrs.

Mr. Reese's outside business activities do not give him an incentive to recommend investment products based on anything other than a client's needs. Nevertheless, the potential for receipt of commissions and other compensation can create a conflict of interest. It can provide an incentive for him to recommend products based on the compensation received rather than on the client's needs. LotusGroup Advisors address this conflict of interest by requiring him to disclose such relationships to clients. Mr. Reese satisfies this requirement by advising clients of the nature of transactions or associations, his role, and any compensation he received at the time of relationship inception. Mr. Reese acts in the best interest of clients. Clients are always in no way required to utilize the services of an Investment Advisor Representative of LotusGroup Advisors in connection with such individual's activities outside of LotusGroup Advisors.

Additional Compensation

The firm's advisors earn a base salary, with most earnings coming from an earned percentage of revenue share collected from client assets managed by the advisor. Mr. Reese does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors.

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Douglas E. Reese is directly supervised by Nicholas S. Pirnack (T: 720.593.9861), who oversees all LotusGroup Investment Advisor Representatives' advisory activities.

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to them). LotusGroup Advisors require all Associates to exercise a fiduciary duty to its clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Douglas E. Reese has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500 involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Douglas E. Reese has not been the subject of a bankruptcy petition.



Investment Advisor Representative

BRIAN W. McAULIFFE
(CRD #5795426)

*1005 South Gaylord Street
Denver, CO 80209
Email: info@lgadvisors.com
Website: www.lgadvisors.com
Phone: 847.802.2155
Fax: 815.572.0566*

February 22, 2024

In accordance with federal and state regulations, Form ADV, Part 2B, this “Brochure Supplement” or “Brochure” is on file with the appropriate securities regulatory authorities as required. All the material within this Brochure Supplement must be reviewed by those who are considering becoming a Client of LotusGroup Advisors, LLC (“LotusGroup,” “LGA,” the “Firm,” the “Adviser,” “us,” “we,” or “our”).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The information provided in this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States or by the SEC. Nothing in this document is to be construed as an offer of securities; please refer to actual fund and investment offering documents for more complete disclosures. Registration of an Investment Advisor does not imply any level of skill or training; investments involve risk, including the possible loss of principal. The oral and written communications of an Adviser provide you with information you may use to determine whether to hire or retain an Adviser.

This Brochure provides information about the above Investment Advisor Representative that supplements LotusGroup’s Firm ADV Brochure. You should have received a copy of the Firm’s ADV Brochure that describes the investment advisory services offered through LotusGroup Advisors, the Investment Adviser. Please contact LotusGroup Advisors CCO, Amanda N. Cohen, directly at 720.593.9861 if you did not receive the Firm’s ADV Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Brian W. McAuliffe is available on the SEC's website at
www.adviserinfo.sec.gov.

(Click on the link, select “Investment Advisor – Individual,” and type in the above Individual CRD #.)

BRIAN W. McAULIFFE

Date of Birth & Educational Background

Brian W. McAuliffe was born in 1999. He received his Bachelor of Business Administration in Finance from Texas Christian University in 2021. Mr. McAuliffe has fulfilled LotusGroup Advisor's requirement that its Investment Advisor Representatives hold either a bachelor's degree and further coursework (i.e., an MBA, a DFP, a CFA, a ChFC, JD, CTFA, EA, or CPA) or possess relevant work experience demonstrating their knowledge of and aptitude for, investment management principles.

Business Background & Experience

- | | |
|--------------------|---|
| 09/2022 to Present | LotusGroup Advisors, LLC , Denver, CO
Investment Analyst & Investment Advisor Representative <ul style="list-style-type: none">- Manage product toolsets such as portfolio management systems & reporting- Public market research and trading |
| 06/2021 to 9/2022 | Cigna , Denver, CO
Risk and Underwriting Senior Analyst <ul style="list-style-type: none">- Member of the Risk Management & Underwriting Leadership Development Program (RULDP)- Analyzed demographic and prior claim history datasets to determine profitable healthcare rates for companies- Actively negotiated rates and terms with sales and broker partners- Evaluated on-going health risk to determine the proper guidelines and measures to mitigate our book of business |

Professional Designations, Licensing & Exams

Brian W. McAuliffe does not have any additional professional designations, licensing, or exams to disclose.

Disciplinary Information

LotusGroup Advisors is required to disclose all material facts regarding any legal or disciplinary event material to your evaluation of Brian W. McAuliffe, providing advice to you. Mr. McAuliffe does not have a disciplinary history to disclose, which may be material to a client's or prospective client's evaluation of this advisory business. There may be items contained on brokercheck.finra.org or www.adviserinfo.sec.gov that you may wish to review and consider in your evaluation of your Investment Advisor Representative's background.

Other Business Activities

Mr. McAuliffe is an Investment Analyst who collaborates on investment decisions and executes trades on behalf of clients. Mr. McAuliffe dedicates 100% of her time to this activity during trading hours. Outside of her activities at LotusGroup Mr. McAuliffe has no other investment-related, other business activities to disclose.

Additional Compensation

The Investment Analyst earns a base salary. Mr. McAuliffe does not receive any additional economic benefit from any person, company, or organization in exchange for providing clients with advisory services through LotusGroup Advisors

Supervision

LotusGroup Advisors takes its compliance and regulatory obligations seriously; supervision is a multi-tiered process. Amanda N. Cohen is the firm's Chief Compliance Officer ("CCO"). She oversees and administers the firm's Compliance Program in coordination with the firm's Principal and Managing Partner, Raphael A. Martorello. Brian W. McAuliffe is directly supervised by Stephanie L. Schlemeyer (T: 720.593.9861).

Covered Persons ("Associates") are required to abide fully by all applicable federal and state regulations and the firm's guiding principles as outlined in its written supervisory Policies & Procedures Manual and Code of Ethics (including any updates to them). LotusGroup Advisors require all Associates to exercise a fiduciary duty to its clients by acting in each client's best interest and always placing client interests first. Associates are required to attest no less than annually to their compliance with and understanding of the above matters, including confirmation and acknowledgment by every Investment Advisor Representative of the firm's expectations regarding their conduct, given the duties, responsibilities, and principles required of them.

Requirements for State Registered Investment Advisers

The following disclosure is provided for your use in evaluating this Investment Advisor Representative's suitability.

A. Brian W. McAuliffe has not been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages over \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

B. Brian W. McAuliffe has not been the subject of a bankruptcy petition.