

Item 1: Cover Sheet

INFORMATIONAL BROCHURE



ATLANTIS WEALTH ADVISORS LLC

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This brochure provides information about the qualifications and business practices of Atlantis Wealth Advisors LLC. If you have any questions about the contents of this brochure, please contact us at 419.794.0538 or by email at service@camelotportfolios.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Atlantis Wealth Advisors LLC is a registered investment adviser. Registration does not imply any certain level of skill or training.

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

Item 2: Statement of Material Changes

Atlantis Wealth Advisors LLC is required to disclose any material changes to this ADV Part 2A here in Item 2.
There are currently no material changes to report.

Item 3: Table of Contents

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INFORMATIONAL BROCHURE
ATLANTIS WEALTH ADVISORS LLC

Item 4: Advisory Business

Principally owned by Darren Munn, CFA, Atlantis Wealth Advisors LLC (“AWA”) has been in business since November 2013. AWA is affiliated with Camelot Portfolios LLC, Camelot Event Driven Advisors, LLC, and Munn Wealth Management, LLC, all registered investment advisers. AWA is an Ohio limited liability company with its principal office in Maumee, Ohio, but maintains regional offices throughout the United States. AWA provides financial planning and asset management services. Depending upon the individual professional or investment team working with the client, AWA may also provide assistance with household finances, debt management or other matters.

We provide these advisory services through numerous investment teams, each of which with their own advisory focus, driven primarily by the types of clients they service. Each investment team that comprises AWA may also use a trade name followed by the wording “a d/b/a of Atlantis Wealth Advisors LLC” or preceded by the wording “Atlantis Wealth Advisors LLC is doing business as”.

Financial Planning, Assistance and Education

In most cases, the client will supply an AWA representative with information including income, investments, savings, insurance, age and many other items that are helpful to the firm in assessing financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you, and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals, and work with you to educate you about household finances and investments. In some cases, upon request, we will assist in the management of finances, though no AWA representative will take responsibility for actual payment of client’s personal bills.

The plan is intended to be a suggested blueprint of how to meet your goals. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need. Also, your circumstances and needs may change as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

Asset Management

Asset management services involve the rendering of advice to clients regarding the purchase and sale of securities in the client’s account. AWA does not have a specified minimum account size. Some clients who wish to access multiple asset management styles, specifically third party managers, may be required to have an account minimum.

Asset management services may be provided on either a “discretionary” or “non-discretionary” basis. When AWA is engaged to provide asset management services on a discretionary basis, AWA will monitor the accounts to ensure that they are meeting the client’s asset allocation requirements. If any changes are needed, AWA will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. Clients may at any time place restrictions

on the way their account is managed. For example, a client may restrict the types of investments AWA may use in the client's account, or the allocations to a security type. Clients engaging AWA on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts). The Limited Power of Attorney is found in the custodial account opening documents.

When a client engages AWA to provide investment management services on a non-discretionary basis, we monitor the accounts in the same way as for discretionary services. The difference is that changes to the account will not be made until AWA has confirmed with the client (either verbally or in writing) that the proposed change is acceptable to the client.

When clients engage AWA to provide asset management services, the client and AWA will execute an Investment Management Agreement that describes the services to be provided, the fees for the service, other expenses related to the provision of the investment management services, and how to terminate the agreement.

Financial Consulting

AWA may provide financial consulting services (including investment and non-investment related matters, including estate planning, retirement planning, tax planning, etc.). Prior to engaging AWA to provide planning or consulting services, clients are generally required to enter into a written agreement with AWA setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to AWA commencing services.

Atlantis Wealth Advisors Teams

Advisor Team Name	Team Leader	Advisory Focus
Horner Investment Group	Richard Horner	Wealth Management, Financial Planning, Medicare Planning
Todd Rhine	Todd Rhine	Financial Planning, Heritage Planning, Wealth Management
Yoseph Financial	Kabeer Gbaja-Biamila	Wealth Management, Financial Planning
Sower Wealth Group	Steve Zerbarini	Wealth Management, Financial Planning

Charitable Giving Options

Charitable Pooled Trust (aka Pooled Income Fund)

In making their financial and estate plans, some affluent individuals choose to utilize a structure involving a charitable remainder trust (frequently referred to as a "CRT"). The basic concept of these trusts is that the individual creating them can (and must) take certain distributions of income from the CRT, but the remainder (what is left after the person who created the trust dies) is donated to a predetermined charity. Because these CRTs require legal documents related to formation, ongoing administration and tax preparation, forming a CRT can be too expensive for some individuals and families. The Charitable Pooled Trust is an example of one attempt to make the benefits of a CRT available to more people.

The Pooled Income Fund, which is also referred to as a Charitable Pooled Trust (“CPT”) works in much the same way as a CRT: the client gives cash or assets to the CPT. The assets of the CPT are managed to generate income for those giving the assets, and remainders are donated to predetermined charities. What is different is the pooled nature of a CPT. In a CPT, the assets of a number of grantors are pooled into one trust. That trust is in turn managed to generate income to the grantors, with the eventual remainder donated to charity.

Camelot Portfolios has an arrangement with The Waterstone Foundation (waterstone.org) and the Community Alliance Foundation. For clients choosing to use a CPT, assets will be transferred to Waterstone. From there, they will be designated as part of a specific group of assets among a number of options. Each group, or “pool” is intended to be managed by a professional money manager. Camelot Portfolios is the manager of “Pool C”, but there are other pools.

Income generated from the pools is distributed to the grantors related to each pool in proportion to the amount of assets they contributed. Upon the death of a contributor, the assets they contributed, plus any appreciation since the date of contribution, are donated to the designated charity.

Because Camelot is the manager of Pool C, Camelot Portfolios receives a fee for managing the assets in Pool C. Accordingly, there is a material conflict of interest when AWA recommends that a client use Waterstone’s CPT, in that Camelot will earn a fee for managing the assets in Pool C, but will not earn a fee to manage the assets in another CPT the client may choose. This conflict extends to AWA, because of the common ownership between Camelot and AWA. We attempt to mitigate this conflict by disclosing it to clients, encouraging our clients to investigate Waterstone Foundation and the concept of CPTs on their own, and reminding our associated persons of their ongoing fiduciary obligations, which means placing client interests ahead of their own.

Camelot Philanthropist Program

The Camelot Philanthropist Program involves increasing the amount of fees paid to the investment manager. The difference between the agreed upon fee and the actual fee charged is donated to a 501(c)(3) nonprofit organization that has agreed to handle the distribution of the differential between management fees and the amount paid to Camelot as a donation to the nonprofit beneficiaries specified by the clients. For example, a client whose overall fee (including their fee to their non-Camelot Portfolios advisor, which in the case of an AWA client, is the AWA representative with whom they are engaged) was 1.50% per annum could elect to increase the amount debited to 2.00% per annum. The client would then have the full 2.00% per annum debited from their account, but the incremental 50 basis points would be given by Camelot Portfolios to a charitable foundation.

Camelot has worked with the National Christian Foundation, and has also begun working with the Effective Give. The National Christian Foundation has offices across the United States, and considers its mission to “mobilize resources by inspiring biblical generosity.” Donations to the National Christian Foundation are intended to be ultimately delivered to charities whose mission is in keeping with the stated intentions of the donor. Effective Give was created by Matthew Moses, a Camelot leadership team member. Effective Give fills a need left open by the NCF program: Effective Give allows smaller donations and clients to choose a specific charity. The Effective Give screens charities whose missions match the donor/client’s stated purpose in the areas of saving lives, fighting poverty, and saving souls, in an effort to ensure the most value is realized for each dollar donated. In some instances, the client/donor chooses a specific charity. Clients choosing a specific charity should realize that their charity is their choice, and therefore not screened by either the foundation in question or Camelot. While there is never a guarantee that even with screening and diligence a charity will always maximize its potential, do good works, or lack malfeasance in their administrative efforts, we believe donating to a charity without

screening or diligence increases the chances that a charity will not have a positive impact, or at least that its impact will be less than one that has been screened.

Donations through the Camelot Philanthropist Program (whether the National Christian Foundation or Effective Give) are intended to be ultimately delivered to charities whose mission is in keeping with the donor's chosen focus. For example, one such possible focus is Fight Poverty. The charities which receive the donations from the respective foundation may not be identical to any that are specifically mentioned as past recipients or others specifically mentioned in any explanatory materials provided to clients at the time the decision is made to participate in the program. This is because ultimately, the foundation has control over the precise recipients for each of their donations. Accordingly, there is no guarantee that any specific charity, even one named in previous donations, will receive donations through the Program. The exception to this is Effective Give, which allows clients to designate a specific charity.

While we recognize that utilizing Effective Give for donor advised funds may present a conflict of interest, clients should be advised that neither Mr. Moses nor any other person or entity affiliated with Camelot receives any compensation related to the administration of Effective Give or the management of Effective Give assets.

Clients should be aware that like many other foundations, the foundations utilized for the Camelot Philanthropist Program have their own administrative costs. Accordingly, the full amount of a donation does not necessarily go directly to the specific charity named. A setup fee or other reduction in the amount donated will be charged. The amount of this fee will vary according to the foundation in question. As of the date of this brochure, NCF, for example, charges a fee of 1.00%. Effective Give has a 10% fee, but only if the client chooses their own charity. There is no fee for donations intended for other options. If clients have any questions related to how a foundation's administrative costs are handled, please feel free to contact your Camelot representative or the foundation directly.

While some clients are still participants, the Camelot Philanthropist Program is no longer available to new clients.

Assets Under Management

AWA has approximately \$141.4 Million in assets under management in 805 accounts.

Item 5: Fees and Compensation

A. Fees Charged/ Fee Schedule:

Financial Planning, Assistance and Education

Financial planning fees can be hourly, fixed fee basis (which may be per project or ongoing), or included with asset management services. Our hourly charge is between \$125 and \$350 per hour. Fixed fees will be between \$0 and \$15,000. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable and will depend on the anticipated complexity of your plan.

Asset Management

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets managed by AWA. The fee range stated is a guide. Fees are negotiable, and may be higher or lower than this range,

based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

Camelot Portfolios charges fees related to the management of assets placed by AWA. These fees are disclosed in the Form ADV Part 2A for Camelot Portfolios, as are the methods by which those fees are calculated.

Some AWA representatives recommend the use of other third party managers in addition to or instead of Camelot Portfolios. The fees for these managers are separate from, and in addition to, fees paid to AWA.

Financial Consulting

Financial consulting is done on a fixed fee basis (which may be per project or ongoing). Fixed fees will be between \$500 and \$4,000 per annum. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable and will depend on the anticipated complexity of your plan.

B. Fee Payment

Investment advisory fees will generally be debited directly from each client's account. However, clients do have the option to pay fees through an automated payment service although it is not required. The advisory fee is paid on either a quarterly or monthly basis depending on the chosen custodian and method. Depending on the client's needs and suitability, the appropriate custodian and billing model will be recommended. Fees that are billed in advance are calculated based on the value of the account(s) at the beginning (value at market close of prior billing period end) of each calendar quarter or month (depending on selected method) and are billed 1 quarter or month in advance. Fees that are billed in arrears are calculated using the average daily account value for the quarter or month. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to the firm.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. It is the responsibility of the client to verify the accuracy of all fee calculations. The client may terminate the investment advisory contract by notifying AWA in writing at its principal place of business.

Clients whose fees are debited from their bank accounts using the automated payment service will provide written consent for AdvicePay to debit their bank accounts for the amount of the fee due to AWA. AdvicePay will then pay the funds to AWA. AWA will not have the ability to directly access the client funds in the bank account.

The advisory agreement may be modified as mutually agreed upon in writing. The agreement is terminable by you at any time. The agreement is not assignable by Atlantis Wealth Advisors LLC without the advance written consent of the client.

C. Other Fees

Mutual Funds

All fees paid to AWA for investment advisory services are separate and distinct from the fees and expenses charged by underlying investments such as mutual funds. In the case of mutual funds, these fees and

expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Expenses of a fund, including management fees payable to the mutual fund manager, will not appear as transaction fees on a client's statement, as they are deducted from the value of the shares by the mutual fund manager. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a fund directly, without the services of AWA. In that case, the client would not receive the services provided by AWA which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by AWA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. AWA can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Other Fees

AWA's affiliate, Camelot Event Driven Advisors LLC is the adviser to an investment company registered under the Investment Company Act of 1940, the Camelot Event Driven Fund, ("CEDF"). In addition, certain investment professionals associated with Camelot Portfolios are entitled to personal compensation related to the services they provide to CEDF. This creates a conflict of interest, which may be material. Because Camelot Event Driven Advisors receives a fee from CEDF for managing CEDF, and individuals receive personal compensation, AWA has an incentive to recommend CEDF to clients because of its affiliation with Camelot Event Driven Advisors, as opposed to simply the client's objectives. Fees payable to Camelot Portfolios will be waived for the portion of the portfolio invested in these funds as follows: management fees will be paid in advance on the full value of the client's portfolio. After payment is received, the portion of the fee applicable to assets invested in any of the proprietary funds will be refunded to client. The refund will be calculated by taking the total value of the client's assets in the proprietary funds, determining the fee paid related to such assets, and then refunding this amount to the client account. For example, a client whose quarterly fee was \$1,000, with 50% of their assets allocated to proprietary funds would be billed \$1,000 and receive a \$500 refund after payment.

These refund calculations will occur on a quarterly basis, and will not take into account changes made during the quarter. For example, if a client's account increased or decreased the allocation to the proprietary fund during either the most recent quarter or the quarter for which the billing amount applies, no adjustments to the total amount paid or the refund will result. Any changes made would be reflected during the next billing cycle.

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of other securities, including commissions for the purchase or sale of a stock or exchange traded fund. There also may be fees associated with the custody of assets.

Because the frequent withdrawal and subsequent deposits of funds from Camelot Portfolios' strategies can have an adverse impact on the success of those strategies and incur costs related to the execution of the liquidation transactions to fund withdrawals, clients withdrawing funds from a strategy offered by Camelot Portfolios will be charged a \$100 withdrawal fee. This fee may be waived by AWA.

For the Camelot Philanthropist Program, donations made through an increase in Camelot's fee are sent to a charitable foundation, who in turn donates to various charities. These foundations will charge a fee or otherwise reduce the amount of the donation to cover their administration costs. Evaluating these costs is part of Camelot's ongoing diligence into the foundation in question.

When utilizing the services of a third party manager (as described more in Item 8), such managers will

charge fees for their services. These fees are separate from, and in addition to, AWA's fees.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata* Fees

If you become a client during a billing period, you will pay a management fee for the number of days left in that billing period (which could be the remainder of a month or a quarter, depending upon the custodian chosen and other factors). If you terminate our relationship during a billing period, you will be entitled to a refund of any pre-paid and unearned management fees for the remainder of the billing period. Once your notice of termination is received, we will refund the unearned fees to you in whatever way you direct (check, wire back to your account). Further, any deposits or withdrawals greater than \$25,000 will result in an adjusted fee calculation with respect to the account related to the deposit or withdrawal. Deposits will incur a pro-rated fee for the remainder of the billing period. Withdrawals will result in a pro-rata refund of the unearned fee with regard to the withdrawn amount.

E. Compensation for the Sale of Securities

To permit AWA clients to have access to as many investment solutions as possible, certain professionals of AWA are registered representatives of Coastal Equities, Inc. ("Coastal") or IBN Financial Services, Inc. ("IBN"), both FINRA member broker-dealers. The relationships with Coastal and IBN allow these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because Coastal and IBN supervise the activities of these professionals as registered representatives of Coastal and IBN, the relationship may be deemed material. However, neither Coastal nor IBN is affiliated with AWA or considered a related party. Coastal and IBN do not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients. Commissions charged for these products will not offset management fees owed to AWA.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with AWA. AWA attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Item 6: Performance-Based Fees

AWA will not charge performance-based fees.

Item 7: Types of Clients

AWA generally provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

AWA recommends minimums based on selected strategy. AWA has strategies ranging from no minimum

to over \$1,000,000 for our fully custom accounts. Minimum recommendations for each strategy can be viewed in our account application packet or Item 8 below.

AWA can waive the minimum amount requirements at their sole discretion.

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

When a client engages AWA, the firm will review a client's portfolios, discuss the client's investment objectives and risk tolerance as well as any potential investment restrictions, and plan a transition for the client's assets from their current accounts to accounts managed by the firm. Transition plans will involve the placement of each client's assets in an asset allocation strategy deemed appropriate by AWA. In some instances, but not always, the assets will be placed in the Camelot Portfolios proprietary strategies. These are described in the Camelot Portfolios Form ADV.

Methods of Analysis and Investment Strategies

Each client's portfolio will be invested according to that client's investment objectives. We determine these objectives by interviewing the client and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a set of asset allocation guidelines. An asset allocation strategy is a percentage-based allocation to different investment types. For example, a client may have an asset allocation strategy that calls for approximately 60% of the portfolio to be invested in equity securities, with 20% of that allocated to international equities and the remaining balance in fixed income. Another client may have an asset allocation of 50-60% in fixed income securities and the remainder equities. The percentages in each type that we recommend are based on the typical behavior of that security type, individual securities we follow, current market conditions, your current financial situation, your financial goals, and the timeline to get you to those goals. In addition, the allocation percentages we recommend represent the maximum percentage we would target at any given time period. There may be market conditions that require more conservative allocation percentages through the use of incorporating a cash allocation into the portfolio. Thus, a client with an allocation strategy that calls for 60% of the portfolio to be invested in equities, could have an equity percentage that ranges anywhere from 0% to 60%+ depending upon market conditions. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client's. Once we agree on allocation guidelines, risk tolerance, time horizon, and how to achieve these results, we will develop an investment strategy to guide all parties involved in the execution of these goals, including but not limited to, AWA, the client, the custodian, and the investment managers.

Upon completion of the investment strategy, we will periodically recommend securities transactions in your portfolio to meet the guidelines of the asset allocation strategy. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

The specific securities we recommend for your account will depend on market conditions and our research at the time. Generally, we recommend that clients invest through one of the proprietary strategies offered by our affiliated adviser, Camelot Portfolios LLC, but may also recommend securities such as stocks, index funds, exchange traded funds, mutual funds, and bonds or other third party managers. All clients whose assets may be invested through a Camelot Portfolios LLC strategy will be given a separate disclosure statement for Camelot Portfolios LLC. Clients are encouraged to carefully review the disclosure information provided by Camelot Portfolios LLC.

When mutual funds are utilized, specific mutual funds are chosen based on where its investment objective fits into the asset allocation recommended by AWA, its risk parameters, past performance, peer rankings, fees, expenses, and any other aspects of the fund AWA deems relevant to that particular fund. We base our conclusions on predominantly publicly available research, such as regulatory filings, press releases, competitor analyses, and in some cases research we receive from our custodian or other market analyses. We will also utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

As assets are transitioned from a client's prior advisers to AWA, there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by AWA. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. In the event an investment in a client account is unable to be unwound for a period of time, AWA will monitor the investment as part of its services to the client. AWA may suggest that a given investment be moved to a separate account.

Third Party Managers

We may recommend that certain portions of a client's portfolio be managed by independent third-party managers or recommend direct investment with independent third-party managers, typically when those managers demonstrate knowledge and expertise in a particular investment strategy. We consider private placement, or "hedge funds" as third party managers.

We examine the experience, expertise, investment philosophies and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentration and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

Based on a client's individual circumstances and needs, we will determine which selected money manager's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance and the investment philosophy of the selected money manager. We encourage clients to review each third-party manager's disclosure document regarding the particular characteristics of any program and managers selected by us.

Your AWA representative will regularly and continuously monitor the performance of the selected money managers. If we determine that a particular selected money manager is not providing sufficient management services to the client, or are not managing the client's portfolio in a manner consistent with the client's investment objectives, we will remove the client's assets from that selected money manager and place the client's assets with another money manager at our discretion and without prior consent from the client, unless the client is non-discretionary. Permission for non-discretionary accounts will be obtained before placing the client's assets with another money manager.

AWA's clients may have their assets allocated to the strategies of their affiliate, Camelot Portfolios. The majority of AWA client assets are invested through Camelot Portfolios LLC. Camelot Portfolios charges a separate and additional fee for the management of these assets. AWA will consider these fees in its decision to recommend the use of any third party manager, including Camelot Portfolios. AWA has a

potential conflict of interest because AWA has the incentive to refer clients to Camelot Portfolios' strategies. Individual investment adviser representatives may receive greater compensation for allocating assets to Camelot Portfolios than to other managers. This conflict of interest is disclosed to clients verbally and in this brochure. AWA also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of AWA, which requires that employees put the interests of clients ahead of their own.

The use of a third party manager, including Camelot Portfolios LLC, does not change the relationship between the AWA professional and the client, in that such professional will still manage the overall client portfolio, adding, subtracting and modifying the allocations to different strategies and managers.

For those who are clients of Sower Wealth Group with Steve Zerbarini as the advisor, the investment models and resources used are as follows:

Aggressive Total Return. This unconstrained portfolio takes a flexible approach seeking to maximize total return through all market cycles and investment types. This portfolio may at times be highly concentrated in individual markets and/or sectors. This investor is comfortable taking risks and with large, short-term fluctuations in their account and substantial risk of loss.

Growth Total Return. This unconstrained portfolio takes a flexible approach seeking to maximize total return while managing risk for the long term with a variety of investment types. This portfolio may at times be allocated up to 100% in equity investments. This investor is comfortable with market-like volatility and is not concerned with significant short term fluctuations in their account value.

Moderate Total Return. This unconstrained portfolio seeks total return in a balanced manner by having some exposure to stable investments but more exposure to growth-oriented investments. This portfolio may at times be allocated up to 80% in equity investments. This investor understands that they will likely not achieve full equity market-like returns in the long run but they would expect to also experience less volatility than the general equity markets over that same period as a trade-off.

Stable Total Return. This unconstrained portfolio seeks to achieve modest gains but with limited volatility by generally favoring more conservative investments. This portfolio may generally be allocated up to 40% in equity investments, and up to 30% in alternatives. This investor should expect to generally underperform equity market returns in favor of reduced volatility and reduced value fluctuations.

BENCHMARK INVESTMENT SELECTION. Investment selection follows a Top-Down and Bottom-Up process. Initial Top-Down analysis considers Macro variables including Domestic and International Monetary Policy, Economic Cycles and Conditions, Fiscal, Political, and Regulatory Policy and Environments, Technological Trends, and other Macro considerations. These Macro considerations drive broad Asset Category, Class, Style, Size, and Regional Allocations. Once these Macro decisions and allocations are made, Individual security selection follows a Fundamental Bottom-Up approach seeking to maximize total return with prudent risk management.

TOOLS AND RESOURCES FOR ANALYSIS.

The following tools and information resources (among others) are some of the regularly utilized and considered sources in assessing the Macro environment:

- Argus Research Group market reports
- CFRA market research economic reports and updates
- National Bureau of Economic Research reports and papers.
- S&P Global research and Commentary
- Central Bank policy statements, research papers, analysis, financial

statements, and indicators. (Federal Reserve and regional FR banks, European Central Bank, Bank of England, Bank of Japan, Bank of Canada, Peoples Bank of China, etc.)

- US Department of Commerce Bureau of Economic Analysis data, research and indicators, and US Census Bureau reporting and data
- US Federal Trade Commission economic reports, research and analysis.
- World Bank, IMF, and UN outlooks and research
- US Labor Department
- Conference Board data and indicators
- NAR data and indicators
- Institute of Supply Management data and reporting
- Various news organizations and data aggregators
- TD Economics Research and reports.

SECURITY SELECTION. Additional resources for individual security analysis and selection may include Thomson Reuters, CFRA, TheStreet, Morningstar, Ford, Vickers, Argus, First Call, corporate financial disclosures, reports, earnings calls, and commentary, briefing.com, among others.

Additionally, clients of Sower Wealth Group may maintain large cash balances as part of an asset allocation strategy and will be billed on that balance. If it is decided to allocate to cash to protect the principal amount, there is a possibility that potential market upside could be missed out on.

Risk of Loss

There are always risks to investing. *Clients should be aware that all investments carry various types of risk, including the potential loss of principal that clients should be prepared to bear.* It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Strategy Risk.** When investments are made through a strategy, rather than individualized investment considerations, there is always the possibility that individualized investment choices would have produced a more positive result for a client than an approach where investments are made for a group of individuals with common characteristics.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that AWA may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. AWA endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline

as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.

- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Information Risk:** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Short Sales.** "Short sales" are a way to implement a trade in a security AWA feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. AWA utilizes short sales only when the client's risk tolerances permit.
- **Options.** The use of options transactions as an investment strategy involves a high level of inherent risk. Although the intent of many of the options-related transactions implemented by AWA is to hedge against principal risk, certain of the options-related strategies (i.e., straddles, short positions, etc.), may in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct AWA, in writing, not to employ any or all such strategies for his/her/their/its accounts. Clients participating in the Options Strategy should *carefully* consider all information regarding the strategy and its risks prior to participating.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While AWA selects individual equities and bonds for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition risk.** As assets are transitioned from a client's prior advisers to AWA there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by AWA. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of AWA may adversely affect the client's account values, as AWA's recommendations may not be able to be fully implemented.
- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.
- **Algorithms and Models.** When an investment manager develops a mathematical algorithm that identifies trigger points for the purpose of indicating a "buy" or "sell" signal, these trigger points are limited in that they are based on solely the data input into the algorithm. There is an unlimited amount of data that can be considered in making any given decision as to whether to buy or sell any given security. An algorithm, by design, ignores some data in favor of others. There is a risk that the data selected for the algorithm will not create a positive result, whereas other data, had it been considered, may do so.
- **REITs:** AWA may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as "REITs". A REIT is an entity, typically a trust or corporation, that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful, but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.
- **MLPs:** AWA may recommend that portions of client portfolios be allocated to master limited partnerships, otherwise known as "MLPs". An MLP is a publicly traded entity that is designed to provide tax benefits for the investor. In order to preserve these benefits, the MLP must derive most, if not all, of its income from real estate, natural resources and commodities. While MLPs may add diversification and tax favored treatment to a client's portfolio, they also carry significant risks beyond more traditional investments such as stocks, bonds and mutual funds. One such risk is management risk-the success of

the MLP is dependent upon the manager's experience and judgment in selecting investments for the MLP. Another risk is the governance structure, which means the rules under which the entity is run. The investors are the limited partners of the MLP, with an affiliate of the manager typically the general partner. This means the manager has all of the control in running the entity, as opposed to an equity investment where shareholders vote on such matters as board composition. There is also a significant amount of risk with the underlying real estate, resources or commodities investments. Clients should ask AWA any questions regarding the role of MLPs in their portfolio.

- **Risks specific to sub-advisors, other managers and private placements.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or their risk management guidelines are more liberal than we would normally employ. The third-party manager who has been successful in the past may not be able to replicate that success in the future. Private funds are pooled investment vehicles, and each pooled investment vehicle is managed according to the stated investment program in the respective private fund's private placement memorandum. This means that individual investors in a fund will not receive individual asset management within the fund. In addition, as we do not control the underlying investments in a third-party manager's portfolio (even if the portfolio is managed by an affiliate), there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for a particular client. Moreover, when we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies. Accordingly, clients investing in private funds should carefully read that fund's private placement memorandum, and clients investing through a third party manager should carefully read that manager's Form ADV.

Item 9: Disciplinary Information

There are no disciplinary items to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

Please see the response to Item 5E with regard to individuals registered in their individual capacities with broker-dealers.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of AWA, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

Certain professionals of AWA are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for AWA clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of AWA. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a

client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage AWA or utilize these professionals to implement any insurance recommendations. AWA attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with AWA, or to determine not to purchase the insurance product at all. AWA also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of AWA, which requires that employees put the interests of clients ahead of their own.

New Hope Christian Community Foundation a/k/a One Voice Foundation

New Hope Christian Community Foundation (NHCCF) supports Christian philanthropy by providing funds and resources to support primarily local ministries, causes, and events which will advance the kingdom work of Jesus Christ in Northwest Ohio and Southeast Michigan. Darren Munn, the owner of AWA, is a member of the board of directors of NHCCF. Clients may be recommended to donate to NHCCF. While this may present a conflict of interest, clients should be advised that Mr. Munn nor any other person or entity affiliated with AWA, receives any compensation related to the administration of NHCCF or the management NHCCF's assets. Clients are free to accept or reject any suggestion regarding where their charitable funds may be given. New Hope Christian Community Foundation is not an advisory client of AWA or any affiliate thereof.

Private Fund

As part of an overall asset allocation strategy, AWA may recommend on a non-discretionary basis that qualified clients consider investing in KHA Capital Partnership I LP (the "Fund"), a private investment fund. The Fund is managed and operated by KHA Capital LLC (the "General Partner"). The General Partner is owned in turn by Camelot Event Driven Advisors LLC ("CEDA"). CEDA is principally owned by Darren Munn, who is also the principal owner of AWA, Camelot Portfolios LLC and Munn Wealth Management LLC. Accordingly, AWA, Camelot Portfolios LLC and Munn Wealth Management LLC have a material conflict of interest in recommending that clients invest in the Fund because their principal owner, Darren Munn, is also an indirect owner of the General Partner, which means that Darren Munn has a financial interest in the Fund and its business performance. This means that the more clients invest in the Fund, the greater the potential for compensation from the Fund to Darren Munn.

Further, investment professionals associated with AWA, may receive compensation or a referral fee from the General Partner for recommending that clients invest in the Fund. This compensation is in addition to the advisory fee AWA receives for managing the client's overall portfolio, and will not offset that fee in any way, because AWA will continue to provide ongoing monitoring and diligence of the Fund investment for as long as the client is invested. This means that AWA and its representatives can earn compensation from the Fund, through the General Partner, in the form of referral fees that may exceed the fee that AWA would earn under its standard asset based fee schedule referenced in Item 5. This fee structure creates a material conflict of interest because AWA may be incentivized to recommend that its clients consider an investment in the Fund based upon the compensation received rather than the client's particular needs. AWA attempts to mitigate this conflict of interest by (i) disclosing the conflict and the relationship between the General Partner and Darren Munn to clients; (ii) not exercising any discretionary authority to place any client assets in the Fund, and informing clients both through this brochure and verbally that clients are under absolutely no obligation to consider or make an investment in the Fund; (iii) informing clients that they may be able to access similar investments through an unaffiliated source (though not necessarily with a comparable strategy, structure or expertise of the General Partner and its management team); and (iv) requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of AWA, which requires that employees put the interests of clients

ahead of their own.

D. Recommendations of other Advisers

See Item 8 regarding Third Party Managers.

In addition, AWA will recommend that clients utilize the proprietary strategies of Camelot Portfolios LLC. While Camelot Portfolios LLC will not pay AWA a referral fee for making these recommendations, the conflict of interest still exists by virtue of the two advisors being under common control. In other words, there is a financial incentive to recommend Camelot Portfolios LLC over another manager. We attempt to mitigate this conflict by educating employees on their fiduciary obligation to place the client's interests ahead of their own, and by disclosing the common control and financial incentive in this brochure.

AWA will also utilize the Turnkey Asset Management Platform (TAMP) referred to as Arete. Arete is a division of Atlantis Wealth Advisors LLC, which therefore presents a conflict of interest due to both being under common control. AWA does not receive compensation from the third party managers on the platform. Rather, AWA debits client fees and remits the portion of the fees due to the third party manager to them. AWA attempts to mitigate this conflict by disclosing it to clients in this Form ADV and by requiring all representatives to follow the firm's policies and procedures, which specifically note the fiduciary obligation to place client interests ahead of the individual representative's or AWA's. Fees for such programs may be higher or lower than if client directly obtained services of the third party manager or if client obtained advisory services separately. When selecting the third party managers for Arete, adequate due diligence will be performed. The due diligence review will include a minimum of a completed due diligence assessment report, a review of assets under management, and expense ratios associated with the managers offerings. Additional due diligence factors may also be considered and requested.

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

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. AWA's affiliate, Camelot Event Driven Advisors LLC, is the adviser to the Camelot Event Driven Fund ("CEDF"). It is expected that AWA will recommend that clients whose investment objectives are appropriate for CEDF to invest with CEDF. This creates a conflict of interest, which may be material. Because Camelot Event Driven Advisors LLC receives a fee from CEDF for managing CEDF, and a fee from the clients whose assets are managed by AWA, AWA has an incentive to recommend CEDF to clients because of the potential for an increased fee, as opposed to simply the client's objectives. AWA attempts to mitigate this conflict by disclosing it to clients and other advisers considering utilizing our services. Camelot Portfolios also attempts to mitigate this conflict by providing a fee discount for assets in the Funds. For more information on how these fee discounts are calculated, please see Camelot Portfolio's ADV, which is available upon request or at www.adviserinfo.sec.gov. Further, AWA includes in its Code of Ethics a requirement that each professional acknowledge their responsibility to place client interests ahead of their own.

C. On occasion, an employee of AWA may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before

a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

D. On occasion, an employee of AWA may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

A. Recommendation of Broker-Dealer

AWA recommends that investment accounts be held in custody by Interactive Brokers, Fidelity Institutional Wealth Services, Inc. ("Fidelity"), or Goldman Sachs (formerly Folio Institutional). Interactive Brokers, Fidelity and Goldman Sachs offer enhanced services to independent investment advisors. These services include custody of securities, trade execution platforms, and access to research not available to the general public. All recommended broker-dealer/custodians are wholly independent from AWA. It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

AWA recommends broker-dealers to its clients based on a variety of factors. These include, but are not limited to, commission costs. However, in choosing a broker-dealer or custodian to recommend, we are most concerned with the value the client receives for the cost paid, not just the cost. The broker-dealers we recommend add value beyond commission cost. Other factors that may be considered in determining overall value include speed and accuracy of execution, financial strength, knowledge and experience of staff, research and service. The broker-dealers we recommend also have arrangements with many mutual funds that enable us to purchase these mutual funds for client accounts at reduced transaction charges (as opposed to other broker-dealers). AWA re-evaluates the use of its recommended broker-dealers at least annually to determine if they are still the best value for our clients.

The broker-dealers we recommend may provide us with some non-cash benefits (not available to retail customers) in return for placing client assets with them or executing trades through them. Such non-cash benefits are referred to as "soft dollars". Currently, these benefits come in the form of investment research and sponsored attendance at various investment seminars. We may also receive such items as investment software, books and research reports. These products, services, or educational seminars are items that will play a role in determining how to invest client accounts. If there is any item that has a multi-use aspect, mixed between investment and non-investment purposes, AWA will determine a reasonable allocation of investment to non-investment use and soft dollars will be allocated only to the investment portion of the product (and we will pay the remaining cost). AWA receives a benefit from these services, as otherwise we would be compiling the same research ourselves. This may cause us, or another adviser, to want to place more client accounts with a broker-dealer/custodian, solely because of these added benefits. However, the value to all of our clients of these benefits is included in our evaluation of

custodians. Products and services received via soft dollars will generally be used for the benefit of all clients. However, it is possible that a given client's trades will generate soft dollars that acquire products and/or services that are not ultimately utilized for that same client's account. Soft dollars provide additional value and are accordingly considered in determining which broker-dealer or custodian to utilize as part of our best execution analysis.

We do not consider whether any other broker-dealer/custodian refers clients to AWA as part of our evaluation of these broker-dealers.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.)

Item 13: Review of Accounts

All accounts will be reviewed by a senior professional on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts.

The annual report in writing provided by AWA is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from their account custodian. Additionally, all clients will receive itemized bills from AWA. Please refer to Item 15 regarding Custody.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

B. Compensation to Non-Advisory Personnel for Client Referrals.

Clients are sometimes introduced to AWA via other third parties. In the event that AWA compensates any party for the referral of a client to AWA, any such compensation will be paid by AWA, and not the client. If the client is introduced to AWA by an unaffiliated third party, that third party will disclose to the client the referral arrangement with AWA, including the compensation for the referral, and provide the client a copy of AWA's ADV Part 2A and 2B. The referral source will also provide a written disclosure to the client regarding the relationship between AWA and the referral source, including the fact that referral fees will be paid.

Item 15: Custody

While some clients may request that an AWA representative assist them in reviewing household finances, at no time will an AWA representative have access to checks or bill paying services.

Situations where the firm is deemed to have custody of client assets include employees serving as trustee or co-trustee of client accounts, where the firm operates under a standing letter of authorization or instructs custodians on a client's instruction to move assets to third parties, or where the firm or its employees otherwise may have access to client assets. In addition, in many cases we have the authority to debit our clients' custodial accounts for management fees. We are deemed to have custody of those assets if, for example, we are authorized and instructed by a client's custodian to deduct our advisory fees directly from the account or if we are granted authority to move money from a client's account to another person's account. At all times, the custodial bank maintains actual custody of those assets. AWA deducts fees from client accounts, but would not have custody of client funds otherwise. Clients will receive statements directly from their custodian, and copies of all trade confirmations directly from their custodian.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by AWA against the information in the statements provided directly from their account custodian. Please alert us of any discrepancies.

Item 16: Investment Discretion

Please see response to Item 4 above regarding investment discretion.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. AWA will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. AWA will not give clients advice on how to vote proxies.

For client assets managed by Camelot Portfolios, Camelot Portfolios may accept proxy voting responsibility. Please see Camelot Portfolios Form ADV Part 2A, available upon request for more information.

Item 18: Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per account and more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.