

## ENTRUST WEALTH ADVISORS, LLC WRAP PROGRAM

Sponsored by

## ENTRUST WEALTH ADVISORS, LLC



*a Registered Investment Adviser*

*March 31, 2024*

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This brochure provides information about the qualifications and business practices of enTrust Wealth Advisors, LLC (hereinafter “enTrust Wealth” or the “Firm”). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. 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. Additional information about the Firm is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Material Changes**

The most recent version of this Wrap Fee Brochure was dated March 31, 2023.

There have been no material changes to this brochure since the last version.

A full copy of this brochure is available at no cost on request. Alternatively, clients and others may review the brochure and other disclosures at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 3. Table of Contents

#### Table of Contents

<i>Item 2. Material Changes .....</i>	<i>2</i>
<i>Item 4. Advisory Business .....</i>	<i>4</i>
<i>Item 5. Account Requirements and Types of Clients.....</i>	<i>7</i>
<i>Item 6. Portfolio Manager Selection and Evaluation .....</i>	<i>7</i>
<i>Item 7. Client Information Provided to Portfolio Managers .....</i>	<i>12</i>
<i>Item 8. Client Contact with Portfolio Managers .....</i>	<i>12</i>
<i>Item 9. Additional Information .....</i>	<i>12</i>

### **Item 4. Advisory Business**

The enTrust Wealth Advisors, LLC Wrap Program (the “Program”) is an investment advisory program sponsored by enTrust Wealth. In addition to the Program, the Firm offers a variety of advisory services, which include financial planning, consulting, and investment management services under different arrangements than those described herein. Prior to enTrust Wealth rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with enTrust Wealth setting forth the relevant terms and conditions of the advisory relationship (the “Advisory Agreement”).

enTrust Wealth filed for registration as an investment adviser in September 2018 and owned by Conners Capital Management, Inc. and Crest Canyon Partners, LLC. Daniel Conners and Michael Crawford are the Managing Members of the Firm. As of December 31, 2023, enTrust Wealth has \$367,471,815 of assets under management, all of which are managed on a discretionary basis.

While this brochure generally describes the business of enTrust Wealth, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on enTrust Wealth’s behalf and is subject to the Firm’s supervision or control.

#### **Description of the Program**

The Program is offered as a wrap fee program, which provides clients with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions for a specified fee or fees not based upon transactions in their accounts. Clients must also open a new securities brokerage account and complete a new account agreement with Fidelity Institutional Wealth Services (“Fidelity”) or another broker-dealer that enTrust Wealth approves under the Program (collectively “Financial Institutions”).

At the onset of the Program, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, enTrust Wealth assists its clients in developing an appropriate strategy for managing their assets. Clients’ investment portfolios are generally managed on a discretionary basis by either enTrust Wealth’s investment adviser representatives or an independent investment manager (collectively “Independent Managers”), as recommended or selected by enTrust Wealth. enTrust Wealth and/or the Independent Managers generally allocate clients’ assets among the various investment products available under the Program, as described further in Item 6 (below). Fees charged by Independent Managers are included in the Firm’s wrap fee.

#### **Fees for Participation in the Program**

The Program is offered on a fee basis, meaning participants pay a single annualized fee based upon assets under management (“Program Fee”).

This Program Fee generally varies between 50 and 125 basis points (0.50% – 1.25%), depending upon the size and composition of a client’s portfolio and the type of services rendered. The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by enTrust Wealth on the last day of the previous quarter. If assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted to reflect the interim change in portfolio value. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the advisory agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is refunded to the client.

### *Performance-Based Fees*

enTrust Wealth does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client’s assets).

For asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, concentrated stock positions, accommodation accounts, alternative investments, etc.), enTrust Wealth may negotiate a fee rate that differs from the range set forth above.

### **Fee Comparison**

As referenced above, a portion of the fees paid to enTrust Wealth are used to cover the securities brokerage commissions and transactional costs attributed to the management of its clients’ portfolios, as well as the fees charged by the Independent Managers engaged to provide services under the Program.

Services provided through the Program may cost clients more or less than purchasing these services separately. The number of transactions made in clients’ accounts, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Fees paid for the Program may also be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

Because the Firm pays for the brokerage fees, the Firm has an incentive to engage in fewer transactions, or transactions that cost less to the Firm, including the use of mutual funds that do not have transaction charges, but have higher expenses to the client. This is a conflict of interest that the Firm mitigates through reviews of the frequency and type of investments made in client accounts to ascertain that they are in the client’s best interest.

### **Fee Discretion**

enTrust Wealth may negotiate with client to charge a greater or lesser fee based upon certain criteria, such as the client’s anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship and account retention. The fee charged will be stated in the client Wrap Fee Agreement, and will not be changed without the client’s prior written consent.

### **Other Charges**

In addition to the advisory fees paid to enTrust Wealth, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions. These additional charges may include mark-ups and mark-downs on fixed-income transactions which cannot be paid by the Firm (or that would be overly burdensome for the Firm to determine the amount of), other transaction costs, custodial fees, fees attributable to alternative assets, margin costs, internal charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), fees and commission for assets not held with Fidelity or other qualified custodian, such as 401(k) or 529 plan assets, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to enTrust Wealth's fee. enTrust Wealth buys, sells and holds in mutual funds that are no-load or load-waived. In the event a client transfers a mutual fund to the Firm that charges a deferred sales charge (12b.1 fee) the Firm will convert the holding to a lower cost option if available. enTrust Wealth and its associated persons do not earn any portion of these additional fees and expenses, however the costs incurred through the additional fees and expenses reduce the overall potential earnings experienced by the Client.

### **Direct Fee Debit**

Clients generally provide enTrust Wealth and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to enTrust Wealth. Alternatively, clients may elect to have enTrust Wealth send a separate invoice for direct payment.

### **Account Additions and Withdrawals**

Clients may make additions to and withdrawals from their account at any time, subject to enTrust Wealth's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to enTrust Wealth, subject to the usual and customary securities settlement procedures. However, enTrust Wealth designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. enTrust Wealth may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charge) and/or tax ramifications.

### **Use of Margin**

enTrust Wealth may recommend that certain clients utilize margin in the client's investment portfolio or other borrowing. enTrust Wealth only recommends such borrowing for non-investment needs, such as bridge loans and

other financing needs. The Firm's fees are determined based upon the value of the assets being managed gross of any margin or borrowing.

### **Compensation for Recommending the Program**

enTrust Wealth has no internal arrangements in place whereby persons recommending the Program are entitled to receive additional compensation as a result of clients' participation. A person recommending the Program will not earn more compensation than he or she would otherwise receive if a client elected another investment management program.

## **Item 5. Account Requirements and Types of Clients**

enTrust Wealth offers services to individuals, investment companies, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

### **Minimum Account Requirements**

enTrust Wealth does not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship. Certain Independent Managers may, however, impose more restrictive account requirements and billing practices from the Firm. In these instances, enTrust Wealth may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

## **Item 6. Portfolio Manager Selection and Evaluation**

enTrust Wealth acts as the sponsor and sole portfolio manager under the Program. Clients' investment portfolios are managed directly by enTrust Wealth or through the use of certain Independent Managers, as referenced above.

While each of these services is available on a stand-alone basis, certain of them can also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement under a single wrap fee arrangement (described in more detail below).

In performing these services, enTrust Wealth is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. enTrust Wealth recommends certain clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents to implement its recommendations. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage enTrust Wealth or its affiliates to provide (or continue to provide) additional services for compensation, including insurance services. Clients retain absolute discretion over all decisions regarding implementation as may be recommended through

additional services, and are under no obligation to act upon any of the related recommendations made by enTrust Wealth under a financial planning or consulting engagement.

Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising enTrust Wealth's recommendations and/or services.

### **Investment and Wealth Management Services**

enTrust Wealth provides certain clients with wealth management services which include a broad range of financial planning and consulting services as well as discretionary management of investment portfolios.

enTrust Wealth primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities, independent investment managers ("Independent Managers") and privately placed securities (including in pooled investment vehicles) in accordance with their stated investment objectives.

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held outside client portfolios. Clients can engage enTrust Wealth to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, enTrust Wealth directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

enTrust Wealth tailors its advisory services to meet the needs of its individual clients and seeks to ensure that client portfolios are managed in a manner consistent with those needs and objectives. enTrust Wealth consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify enTrust Wealth if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if enTrust Wealth determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

### **Use of Independent Managers**

As mentioned above, enTrust Wealth selects certain unaffiliated Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

enTrust Wealth evaluates a variety of information about Independent Managers, which includes the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent



Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. enTrust Wealth also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

enTrust Wealth provides services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. enTrust Wealth seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

### **Methods of Analysis and Investment Strategies**

enTrust Wealth tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. enTrust Wealth consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify enTrust Wealth if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. The Firm manages client assets on a custom basis, where the Firm and the client choose investments. Clients can impose reasonable restrictions or mandates on the management of their accounts if enTrust Wealth determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts. The Firm may recommend options and derivatives in an attempt to reduce risk, generate income or leverage return potential in situations that it believes is in the best interest of the client.

### **Risk of Loss**

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to the Firm's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging the Firm to provide investment management services on their behalf.

#### *Market Risks*

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of enTrust Wealth's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that enTrust Wealth will be able to predict these price movements accurately or capitalize on any such assumptions.

#### *Volatility Risks*

The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

### *Cash Management Risks*

The Firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

### *Equity-Related Securities and Instruments*

The Firm may take long and short positions in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

### *Fixed Income Securities*

Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility.

### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares

when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

### *Use of Independent Managers*

As stated above, enTrust Wealth selects certain Independent Managers to manage a portion of its clients' assets. In these situations, enTrust Wealth continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, enTrust Wealth does not have the ability to supervise the Independent Managers on a day-to-day basis.

### *Options*

Options allow investors to buy or sell a security at a contracted "strike" price at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (i.e., limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

### *Derivatives*

Derivatives are financial instruments based on agreements or contracts and whose value is tied to an underlying asset, instrument, or index. Derivatives generally create leverage. As a result, a small movement in the underlying asset's value can cause a large difference in the value of the derivative and result in large profits or losses depending on the direction of the change. Derivatives are subject to liquidity and interest rate risk, market risk, credit risk and management risk. In addition, derivative instruments may experience dramatic price changes and imperfect correlations between the price of the derivative contract and the underlying security or index, which may increase a mutual fund's volatility. Derivatives and forward-settling securities also involve leverage risk because they can provide investment exposure in an amount exceeding the initial investment.

### *Use of Private Collective Investment Vehicles*

enTrust Wealth recommends that certain clients invest in privately placed collective investment vehicles (e.g., hedge funds, private equity funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. Hedge funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

### *Currency Risks*

An advisory account that holds investments denominated in currencies other than the currency in which the advisory account is denominated may be adversely affected by the volatility of currency exchange rates.

### *Interest Rate Risks*

Interests rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

### **Voting of Client Securities**

enTrust Wealth does not accept the authority to vote a client's securities (i.e., proxies) on the client's behalf.

## **Item 7. Client Information Provided to Portfolio Managers**

In this Item, enTrust Wealth is required to describe the type and frequency of the information it communicates to the Independent Managers, if any, managing its clients' investment portfolios. Clients participating in the Program generally grant enTrust Wealth the authority to discuss certain non-public information with the Independent Managers engaged to manage their accounts. Depending upon the specific arrangement, the Firm may be authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. enTrust Wealth may also share certain information related to its clients' financial positions and investment objectives in an effort to ensure that the Independent Managers' investment decisions remain aligned with its clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its clients' portfolios. Please see the Firm's Privacy Policy for terms and conditions, including opt out provisions, relative to this sharing practice.

## **Item 8. Client Contact with Portfolio Managers**

In this Item, enTrust Wealth is required to describe any restrictions on clients' ability to contact and consult with the portfolio managers managing their investment portfolios. There are no restrictions on clients' ability to correspond with enTrust Wealth, which acts as the sole portfolio manager under the Program. Clients can generally contact the Independent Managers managing their portfolios through enTrust Wealth by providing the Firm with written request and identification of the questions or issues to be discussed with the Independent Managers. After receiving the client's written request, enTrust Wealth will take steps to accommodate the client's request through means that may include contacting the Independent Managers for the client, arranging for the Independent Managers and the client to communicate directly or other means.

## **Item 9. Additional Information**

### **Disciplinary Information**

enTrust Wealth has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

### **Other Financial Industry Activities and Affiliations**

This item requires investment advisers to disclose certain financial industry activities and affiliations. enTrust Wealth has no Financial Industry Activities or Affiliations to disclose.

### **Licensed Insurance Agents**

A number of the Firm's Supervised Persons are licensed insurance agents and offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that enTrust Wealth recommends the purchase of insurance products where its Supervised Persons are entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest and all related costs and fees are disclosed regardless of any such affiliations.

### **Code of Ethics**

enTrust Wealth has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. enTrust Wealth's Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of enTrust Wealth's personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. The Firm's Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (*i.e.*, spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual

funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact enTrust Wealth to request a copy of its Code of Ethics.

### **Account Reviews**

enTrust Wealth monitors positions held on behalf of clients on a continuous and ongoing basis while regular client portfolio reviews are conducted on at least a quarterly basis. Such reviews are conducted by the Firm's Principal(s). All investment advisory clients are encouraged to discuss their needs, goals and objectives with enTrust Wealth and to keep the Firm informed of any changes thereto. The Firm contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and quarterly to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

### **Account Statements and Reports**

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. The account statements provided by the custodian(s) are the official account record. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from enTrust Wealth and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from enTrust Wealth or an outside service provider.

### **Client Referrals**

In the event a client is introduced to enTrust Wealth by an unaffiliated person the Firm may pay that referring party (promoter) a referral fee in accordance with applicable securities laws. Unless otherwise disclosed, any such referral fee is paid solely from enTrust Wealth's investment Program Fee and does not result in any additional charge to the client. If the client is introduced to the Firm by an unaffiliated promoter, the promoter is required to provide the client with enTrust Wealth's written brochure(s) and a copy of a disclosure statement containing the terms and conditions of the arrangement. The promoter is also required to disclose the nature of his or her relationship to prospective clients at the time of the solicitation, whether or not he/she is a client of the firm and will provide all prospective clients with a copy of the Firm's written brochure(s) at the time of the referral.

### **Custody**

enTrust Wealth acts as Trustee for one or more accounts. In these limited instances, the Firm is deemed to have custody, and complies with relevant rules and regulations including the performance of a surprise audit once annually.

### **Receipt of Economic Benefit and Brokerage Practices**

enTrust Wealth recommends that clients utilize the custody, brokerage and clearing services of National Financial Services LLC and Fidelity Brokerage Services LLC (together with affiliates, "Fidelity"), as well as Schwab

Institutional ("Schwab") for investment management accounts. enTrust will consider managing a client's assets held at an alternative custodian as an accommodation for clients with prior established relationships or under other such circumstances. The final decision to custody assets with either custodian is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. enTrust Wealth is independently owned and operated and not affiliated with Fidelity or Schwab. The custodians provide enTrust Wealth with access to their institutional trading and custody services, which are typically not available to retail investors.

Factors which enTrust Wealth considers in recommending any broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The custodians enables the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges.

The commissions paid by enTrust Wealth's clients to the custodians are consistent with with the Firm's duty to seek "best execution." enTrust may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where enTrust Wealth determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. enTrust Wealth seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions may be cleared through other broker-dealers with whom the Firm and its custodians have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, the Client may be required to sign an additional agreement, and additional fees are likely to be charged.

Consistent with seeking best execution, brokerage transactions are directed to certain broker-dealers in return for investment research products and/or services which assist enTrust Wealth in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because enTrust Wealth does not have to produce or pay for the products or services.

enTrust Wealth periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to seek best execution.

### **Software and Support Provided by Financial Institutions**

enTrust Wealth receives without cost from the custodians administrative support, computer software, related systems support, as well as other third party support as further described below (together "Support") which allow enTrust Wealth to better monitor client accounts maintained at the custodians and otherwise conduct its business. enTrust Wealth receives the Support without cost because the Firm renders investment management services to



clients that maintain assets at the custodians. The Support benefits enTrust Wealth, but not its clients directly. Clients should be aware that enTrust Wealth's receipt of economic benefits such as the Support from a broker-dealer creates a conflict of interest since these benefits may influence the Firm's choice of broker-dealer over another that does not furnish similar software, systems support or services. In fulfilling its duties to its clients, enTrust Wealth endeavors at all times to put the interests of its clients first and has determined that the recommendation of the custodian is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, enTrust Wealth receives the following benefits from the custodians: i) receipt of duplicate client confirmations and bundled duplicate statements; ii) access to a trading desk that exclusively services its institutional traders; iii) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and iv) access to an electronic communication network for client order entry and account information.

The custodians also make available to the Firm, at no additional charge, certain research and brokerage services, including research services obtained by the custodians directly from independent research companies, as selected by enTrust Wealth (within specified parameters). enTrust Wealth also receives additional services from the custodians including marketing, compliance, trading, account performance, and other services from third- parties. Without this arrangement, the Firm might be compelled to purchase the same or similar services at its own expense.

### **Brokerage for Client Referrals**

enTrust Wealth does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

### **Trade Aggregation**

Transactions for each client will be effected independently, unless enTrust Wealth decides to purchase or sell the same securities for several clients at approximately the same time. enTrust Wealth may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among enTrust Wealth's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which enTrust Wealth's Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. enTrust Wealth does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios,



with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

### **Financial Information**

enTrust Wealth is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.