

FORM ADV PART 2A: FIRM BROCHURE

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This Brochure provides information about the qualifications and business practices of Entoro Wealth, LLC, ("Entoro Wealth"), a registered as an Investment Adviser with the United States Securities and Exchange Commission ("SEC"). Registration with the SEC does not imply a certain level of skill or training. If you have any questions about the contents of this Brochure, please contact us at 713-823-2900. The information in this Brochure has not been approved or verified by the SEC or any state securities agency. additional information about Entoro Wealth is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Since the initial filing of the ADV Part 2- on January 20, 2020, Entoro Wealth has transitioned from being registered as a Texas investment adviser to registration as a federally registered investment adviser. Entoro Wealth has been engaged to advise a registered interval fund, the Entoro Gray Swan Fund, which has been sponsored by an affiliate, Entoro Securities, LLC. Please note that registration with the SEC does not imply a certain level of skill or training.

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Item 4 - Advisory Business

Entoro Wealth, LLC ("Entoro Wealth") is located in Houston Texas. Entoro Wealth is wholly owned by Entoro, LLC of which James C. Row is the majority owner. Entoro Wealth will provide investment advisory services to the Entoro Gray Swan Fund, a Delaware statutory trust, which will be registered with the Securities and Exchange Commission (the "SEC") as a registered investment company.

In addition, it is intended that Entoro Wealth will render discretionary investment advisory services to individual clients by investing in securities that it believes are suitable for each client based on the client's investment objectives, risk tolerance and other individual client needs and circumstances. advisory services will be tailored to a client's specific needs and goals through a dialogue concerning their assets, liabilities, income, expenses, goals, and objectives, and an investment objective long-term plan is established, then reconfirmed or adjusted at least annually. While Entoro Wealth does not limit to the types of investments offered, clients may impose restrictions on investing in certain securities or types/classes of securities.

Entoro Wealth is under common control with Entoro Securities, LLC, its affiliated broker/dealer member firm of the Financial Industry Regulatory authority ("FINRA-").

Prior to Entoro Gray Swan Fund, Entoro Wealth did not have any assets under management.

Item 5 - Fees and Compensation

The advisory fees Entoro Wealth ranges from 1.00-2.00% based on the net asset value of the securities under management in the account plus, in most cases, a performance fee. The Entoro Gray Swan Fund pays a management fee equal to 1.50% of the average daily net asset value of the fund. The advisory fees charged to clients are typically subject to change with 30 days written notice. Fees are payable quarterly in arrears and such fees may be deducted from client's account(s) within twenty (20) days following the end of each [calendar] quarter. Notwithstanding this fee schedule, Entoro Wealth retains the discretion to negotiate fees on a client-by-client basis.

Because fees are paid in arrears, no pro-ration of fees will occur upon termination of the an investment advisory relationship, however a final fee will be charged which may be prorated if terminated within a quarter according to the number of days for which Entoro Wealth provided investment advisory services during the current quarter.

Entoro Wealth maintains a limited Power of Attorney for all discretionary accounts for directing and or effecting investments on behalf of the managed account, for the direct payment of management and performance fees and the payment of commissions, custodial fees and or other charges incurred by managed accounts. c-t the inception of the relationship and each quarter thereafter, the custodian will be notified of the amount of the fees due and payable to Entoro Wealth. The custodian will "deduct" the fees from client account(s) or, if a client has more than one account, from the client account(s) designated to pay the advisory fees.

Entoro Wealth's fees are exclusive of any brokerage commissions, transaction fees, and other related costs and expenses incurred by or on behalf of the client. Clients may incur certain charges imposed by custodians, brokers, third party investment advisers and other third parties such as fees charged by managers, custodial fees, sales loads, 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. To the extent mutual funds are selected, the annual advisory fee set forth above does not include the fees and expenses associated with investing in mutual funds or other costs of establishing and maintaining an account with mutual funds including any Rule 12b-1 fees and expenses. In addition to the annual advisory fee, each mutual fund in which client assets are invested will incur separate investment advisory fees and other expenses for which a client will bear a proportionate share. Clients have the option to purchase investment products that Entoro Wealth recommends through other brokers or agents that are not affiliated with Entoro Wealth.

Some of Entoro Wealth's advisory representative(s) are also registered in a brokerage capacity as registered representative(s) of Entoro Securities, LLC ("Entoro Securities"). As such, Entoro Securities, on behalf of its advisory representatives may receive compensation and 12b-1 fees from mutual funds in which client assets are invested. These fees and commissions are in addition of Entoro Wealth's advisory fees charged to the client. Receipt of these fees and commissions may create a conflict of interest by giving the advisory representative an incentive to recommend investment products based on compensation received by such advisory representative, rather than on the client's needs. Entoro Wealth seeks to address this conflict of interest by disclosing to clients the receipt of fees and compensation by certain advisory representatives in connection with the execution of client transactions, by utilizing share classes of mutual funds that either minimize brokerage and or commissions, waiving the receipt of such compensation, and/or providing a reduction in the advisory fees by the commissions earned.

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

Entoro Wealth will not charge a performance fee to the Entoro Gray Swan Fund. The fees charged to the Fund are set forth in the Entoro Gray Swan Fund prospectus.

Entoro Wealth may charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) in accordance with Rule 205-3 of the Investment Advisers Act of 1940, as amended, to its managed account clients.

Performance-based fee arrangements may create an incentive for the Entoro Wealth to recommend investments that may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. The inclusion of unrealized gains when calculating the Performance Fees may also increase the amount earned by Entoro Wealth from such Performance Fee. Potential conflicts of interest may arise from the side-by-side management of these clients based on fee structures. Entoro Wealth has implemented procedures designed to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Entoro Wealth, its principals and their respective affiliates may serve as investment advisers or advisors to other investment funds and managed accounts in the future, certain of which may employ investment strategies that are substantially similar to the investment strategy employed by Entoro Wealth. This creates the potential risk of conflicts of interest because Entoro Wealth may favor one type of investor over another in the allocation of investment opportunities, particularly where differing fee structures for each investor have been negotiated. An additional risk potentially exists, because Entoro Wealth's affiliates and their employees have the right to invest in investment products and/or individually in digital asset products. As an emerging asset class, the market price and availability of digital asset are subject to high volatility and any market order placed affects both market price and availability.

Entoro Wealth's fiduciary obligations require it to place client interests over its own interests, treat all clients equitably and disclose material facts to all of its investors. To help mitigate potential conflicts, Entoro Wealth has implemented policies and procedures designed to monitor such risks on an ongoing basis.

Item 7 - Types of Clients

Entoro Wealth expects to provide services to high net worth individuals and SEC registered investment companies.

Fees and account sizes are subject to negotiation. In addition, Entoro Wealth reserve the right to refuse to accept proposed management responsibilities or to resign from the management of any individual account.

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

Investment Strategies

The composition of an investment portfolio is dependent upon the investment goals of each client. Without limiting the types of securities, a client's portfolio may be comprised of one or more of the following security types:

- Equity securities
- Commodities and Commodities Futures
- Exchange-listed securities
- Over-the-counter securities
- Corporate debt
- Interests in partnerships invests in real estate, oil and gas interests
- Private Placements
- Digital currencies and digital currency derivative assets
- U.S. Treasuries and other governmental obligations

Entoro Wealth is dedicated to providing a high level of service to its clients, both directly and through the funds which it advises. Entoro Wealth believe that its portfolio managers are well qualified to assess individual client needs and create client portfolios to address those needs.

Entoro Wealth employs various methods of security analysis, including fundamental and technical analysis, to assist it in formulating investment strategies. It believes that investment portfolios should be custom managed to meet the specific investment goals, risk tolerances, and other constraints that are unique to each of its clients.

The following describes risks that are inherent in securities investment and which may result in a loss to client portfolios:

Equity securities, exchange-listed securities and over the counter securities: While "long" securities may outperform other types of investments at certain times, individual stock prices may go up and down more dramatically. A slower-growth or recessionary economic environment could have an adverse effect on the price of "long" securities. Entoro Wealth also expects to invest in "inverse" securities - securities that increase in value in a down or recessionary market. Those securities tend to lose value in rising equity markets.

Commodities and Futures

Entoro Wealth expects to invest its client's assets in bitcoin futures ("BTC Futures). Futures, and BTC Futures in particular, carry specific risks. Those risks are described in detail in the Entoro Gray Swan Fund Prospectus, and are detailed to clients who elect to invest in such securities.

Corporate debt: Risks include interest rate fluctuation, liquidity and timing of redemption.

Interests in partnerships investing in real estate, oil and gas interests: Subject to risks affecting real estate investments generally (including management performance, market conditions, competition, property obsolescence, changes in interest rates and casualty to real estate).

Private Placements: Risks include general economic conditions, management performance, environmental risks and associated costs, legal and regulatory requirements and compliance with applicable laws. Seasonality of the business and inability to predict cash flow.

Lack of Diversification: Portfolio investments can be concentrated, and diversification can be limited. There are no limits with respect to position sizes. Any assets or combination of assets that can be held in a securities account can be purchased or sold.

Cash and Cash Equivalents: A client accounts generally maintain significant cash positions from time-to-time. Clients will pay the Investment Management Fee based upon the net asset value of the Account, including cash and cash equivalents. The Account can also forego investment opportunities to hold cash positions if Entoro Wealth considers it in the best interests of the Accounts.

Interest Rate Fluctuation: The prices of securities in which Entoro Wealth invests are sensitive to interest rate fluctuations. Unexpected fluctuations in interest rates could cause the corresponding prices of the long and inverse (short) portions of a position to move in directions which were not initially anticipated. In addition, interest rate increases generally will increase the interest carrying costs of borrowed securities and leveraged investments.

Before trading in any security, investors should carefully read the most up-to-date prospectuses/listing documents, financial statements, announcements and other information published.

As financial markets and products evolve, Entoro Wealth invests in other instruments or securities, whether currently existing or developed in the future, when consistent with client guidelines, objectives and policies.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. All investments include inherent risks of loss of principal and are affected by many factors which may be out of the control of Entoro Wealth and could not be reasonably foreseen. As investment objectives can fluctuate substantially, Entoro Wealth will strive to make security purchases and sales that, in line with the investment objective which a client may set, will fulfill client objectives over the long term. Entoro Wealth cannot guarantee any level of performance over any time horizon, nor can it ensure that a client will not experience a loss of its assets either in whole or in part.

Item 9 - Disciplinary Information

Neither Entoro Wealth nor members of its management have ever been the subject to any legal or disciplinary event that would be material to a client's or a prospective client's evaluation of its business or the integrity of its management.

Item 10 - Other Financial Industry Activities and Affiliations

Entoro Securities, LLC - Affiliated Broker-Dealer

James C. Row is an owner and registered representative of Entoro Securities, LLC ("Entoro Securities"). Entoro Securities is registered as a broker-dealer with the Securities and Exchange Commission ("SEC") and various state jurisdictions, and a member firm of the Financial Industry Regulatory Authority ("FINRA"). Entoro Securities is affiliated to Entoro Wealth through common ownership and control.

As a result of these broker-dealer activities, there is a conflict of interest in that there is an incentive for James C. Row to recommend those securities which generate commissions for James C. Row and Entoro Securities. Notwithstanding such conflict of interest, Entoro Wealth addresses its fiduciary duty by maintaining oversight of James C. Row's securities activities and certain outside business activities. Such oversight includes the review of James C. Row's securities business to ensure he considers his advisory client's best interests.

In addition, James C. Row has the following business activities:

- CEO of Producers Energy, LLC; this is not investment related; dormant oil & gas operating company, time spent is 0 hours on this activity.
- Partner of Dynaforce Energy; this is not investment related; dormant acquisition vehicle for solar assets, time spent is 0 hours on this activity
- Member of Roca Energia; this is not investment related; consulting activities for technology services; time spent is 0 hours on this activity.
- Managing Partner of Entoro, LLC, this is not investment related; holding company for multiple Entoro Entities; time spent on this is 2 hours per week.
- Managing Partner of Entoro Capital, LLC; this is not investment related; holding company for multiple Entoro Entities; time spent is 2 hours per week on this activity.
- Managing Director of Entoro International, LLC; this is not investment related; consulting and advisory for non-us energy projects; time spent is 0 hours on this activity.
- Managing Member of Offerboard, LLC; this is not investment related; web technology platform; time spent is 5 hours per week on this activity.
- Partner of Medcap Investments, LLC; this is not investment related; healthcare consulting, time spent is 0 hours on this activity.
- Managing Member of Entoro Xchange; this is not investment related; 0 hours on this activity.
- Member of Family Office Network (FON), this is not investment related; time spent on this is 2 hours per week.
- Director and on the board of advisors for EN Partners; this is not investment related; time spent is 1 hour per week on this activity.

- Minority equity owner of Vertical Associates, LLC; this is not investment related; time spent on this is 15 minutes per week.
- Portfolio Manager of the Entoro Gray Swan Fund, Investment related, time spent is 2 hours per week on this activity.

As stated above, there is a conflict of interest as Mr. Row may earn compensation by the companies listed above. Notwithstanding such conflict of interest, Entoro Wealth addresses its fiduciary duty by disclosing to clients and by maintaining oversight of James C. Row's securities activities and certain outside business activities.

Item 11 - Code of Ethics

Entoro Wealth and its related persons may recommend or purchase on behalf of clients, securities or investment products which Entoro Wealth and/or its related persons also invest. Entoro Wealth's personal trading policy precludes it and its related persons from purchasing securities that it recommends or purchases on behalf of its clients if it would be prohibited under federal securities laws and requires Entoro Wealth to maintain a written record of such transactions.

Entoro Wealth is required to maintain records of all transactions for all of its client's accounts. It also maintains a record of all transactions made for the accounts of its access persons as described in Entoro Wealth's personal trading policy. It is Entoro Wealth's policy that no employee transaction will be placed in advance of a client's transaction and shall not be on a more favorable basis than a client's transaction.

Entoro Wealth has adopted a Code of Ethics which applies to all of its access persons. A copy of the Entoro Wealth Code of Ethics is available to any client or prospective client upon request. The Code of Ethics provides that access persons must comply with all applicable federal securities laws and imposes certain trading restrictions on persons who are likely to now about Entoro Wealth's trading activity. Entoro Wealth has trading preclearance procedures in place to avoid conflicts of interest related to common ownership of securities by its clients and its access persons. These preclearance procedures include prohibitions on the purchase or sale of most securities on the same day as those same securities may be purchased or sold by any client unless the purchase or sale is aggregated with client trades.

Cross Trades: Entoro Wealth may occasionally conduct cross trades for client accounts. A cross trade occurs when Entoro Wealth purchases and sells a particular security between two or more accounts under its management. Entoro Wealth utilizes cross trades when it deems the practice to be advantageous for each participant. Entoro Wealth has a conflict of interest when effecting a cross trade because it must consider the interests of both the selling account and the buying account in the same transaction. This conflict of interest may be greater in situations where one of the clients involved in the transaction pays Entoro Wealth a higher management fee or a performance-based fee. Additionally, clients might have received a more favorable price if the transaction were executed in the open market rather than having the security bought or sold through a cross trade.

To address these concerns, Entoro Wealth's procedures require that cross trades be effected at the independent current market price of the security as determined by reference to independent third-party sources. Under Entoro Wealth's policy, cross trades are not permitted in accounts that are subject to the Employee Retirement Income Security Act ("ERISA"). Entoro Wealth does not receive brokerage commissions when conducting cross trades for client accounts. Entoro Wealth will seek to ensure that the terms of the transactions, including the consideration to be paid or received, are fair and reasonable, and the transactions are executed in a manner that is in the best interest of the clients involved in the cross trade.

Item 12 - Brokerage Practices

Entoro Wealth considers numerous factors in determining the brokers through which it executes securities transactions on behalf of its clients, including best price and execution, the size of the transaction, and the commission budget. Entoro

Wealth expects not to pay any commissions that would surpass generally accepted commission schedules. Entoro Wealth will allocate brokerage transactions in a manner it believes to be fair and responsible, and consistent with its objectives.

Entoro Wealth will select such brokers that can effect transactions at the best price and execution under the prevailing circumstances; however, clients may require that it place their orders for the execution of transactions with or through a broker/dealer that it otherwise would not have deemed to provide best execution. Dually registered representatives affiliated with Entoro Wealth will receive commissions when portfolio transactions are affected on behalf of a client. -A registered representative can charge an advisory fee and a ticket charge and can receive a portion of the distribution and Rule 12b-1 fees that are utilized by advisory clients. In managing investment portfolios, Entoro Wealth will act in a manner consistent with what it understands and believes to be the best interests of the client.

Allocation of Investment Opportunities and Orders

Entoro Wealth strives to treat all clients in a fair and equitable manner in all dealings, including trade related activities. When orders are generated, the decision on which accounts should participate, and in what amount, is based on the type of security or other asset, the present or desired structure of the various portfolios and the nature of the account's goals. Other factors include risk tolerance, tax status, permitted investment techniques and, for fixed-income accounts, the size of the account and settlement and other practical considerations.

In an effort to achieve best execution, Entoro Wealth considers the following factors in selecting brokers:

- Execution capability
- Order size and market depth
- Availability of competing markets
- Trading characteristics of the security
- Availability of accurate information comparing markets
- Quantity and quality of research received from the broker dealer
- Financial responsibility of the broker-dealer
- Confidentiality
- Responsiveness
- Ability and willingness to commit capital
- Availability of accurate information comparing markets
- The technology to process such data
- Other factors that may bear on the overall evaluation of best price and execution

In addition, Entoro Wealth periodically reviews its transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Research Services/Soft Dollars

Entoro Wealth does not participate in any soft dollar arrangements.

Choice of Futures Commission Merchant

Trading Aggregation Practices

When Entoro Wealth trades the same security in more than one client account, it generally attempts to batch or "bunch" the trades in order to create a "block transaction." Generally, buying and selling in blocks helps create trading efficiencies,

prompt attention and desired price execution. Whenever possible, Entoro Wealth will attempt to batch or aggregate trades for clients who use the same directed brokers in order to create a "block transaction."

The commission amount and per share commission rate will differ between clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account, and the total relationship between the client and their broker. Because each client differs in portfolio size, investment objective, equity exposure and the extent of the relationship with their broker, Entoro Wealth does not negotiate commission discounts on the block transaction itself.

Directed Brokerage

If requested by the client, Entoro Wealth can place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client.

Entoro Wealth does not maintain agreements with referring brokers regarding its internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business may be directed to a particular broker if the client has directed, agreed or stipulated Entoro Wealth to do so. Commissions are not intended to compensate brokers for client referrals.

Entoro Wealth is unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if a client limits its brokerage discretion. Directed brokerage commission rates can be higher than the rates Entoro Wealth might pay for transactions in non-directed accounts. Also, clients that restrict Entoro Wealth's brokerage discretion can be disadvantaged in obtaining allocations of new issues of securities that it purchases or recommends for purchase in other clients' accounts. It is Entoro Wealth's policy that such accounts not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, Entoro Wealth encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

Other Fees in Connection with Trading

In Entoro Wealth's efforts to achieve best execution of portfolio transactions, it trades securities for client accounts by utilizing electronic marketplaces or trading platforms. Some of these electronic systems may impose additional service fees or commissions. Entoro Wealth pays these fees directly to the provider of the service or these fees are included in the execution price of a security. Entoro Wealth's intention is that it will only use such systems and incur such fees if it believes that doing so helps to achieve the best execution of the applicable transaction, taking into account all relevant factors under the circumstances. For example, Entoro Wealth will consider the speed of the transaction, the price of the security, its ability to block the transaction and other factors in connection with trading of stocks and bonds.

Accounts with Different Investment Objectives

It is possible that Entoro Wealth will manage accounts of clients whose investment objectives are substantially different from one another. As a result, it is possible that it would be appropriate for Entoro Wealth to sell a security "short" from one account while holding it "long" in another account. This will occur if it manages an account that involves significant short-term trading or pursues unique options strategies. In general, however, Entoro Wealth's positions with regard to any

security will be net long. It seeks to avoid a conflict of interest by attempting to limit such situations to, for example, an instance in which there is a readily available supply of the securities being purchased or sold and the transactions in a security do not affect its market price.

Item 13 - Review of Accounts

James C. Row, Managing Director, will review all accounts on at least a quarterly basis. There is no limitation on the number of client accounts assigned to any particular account officer, nor is there a precise sequence or review schedule. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances or the market economic or political environment.

The clients will receive statements from the custodian, at least quarterly, detailing their individual assets and all activity in the client's account.

Item 14 - Client Referrals and Other Compensation

Entoro Wealth does not participate in client referrals.

From time-to-time, Entoro Wealth may enter into placement agent agreements with broker-dealers to introduce potential investors to the funds it advises or for the creation of a managed account. All such arrangements will fully comply with the requirements of Rule 206(4)-3 of the Advisers Act and related SEC staff interpretations.

When providing investment advisory services to clients, Entoro Wealth does not differentiate among clients based on how or from what source any investor became a client in the funds that it advises or establishes a managed account. Thus, no conflicts of interest arise as a result of any such arrangements.

Item 15 - Custody

Entoro Wealth will not have physical custody of client assets for its advisory clients, however, since it will have the ability to debit advisory fees from clients' accounts, it will be deemed to have custody of the assets in such accounts. Each client must select a custodian and will be required to pay custodian fees to such custodian. Also, clients will incur brokerage and other transaction costs in the course of Entoro Wealth's management of their accounts. Clients will receive account statements from one or more qualified custodians covering the funds and securities in their account(s).

In fulfilling its responsibilities under the Custody Rule, Entoro Wealth's qualified custodian(s) send account statements, on at least a quarterly basis, to the fund investors and managed accounts. Alternatively, Entoro Wealth may rely on the "Annual Audit Exception" of the Advisers Act to meet its obligations to its investors (or beneficial owners) with respect to the Custody Rule. In the latter scenario, Entoro Wealth would obtain an audited financial statement annually, conducted by an independent accounting firm registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board and prepared in accordance with GAAP. Thereafter, Entoro Wealth would deliver the audited financial statement to each fund's underlying investors (or beneficial owners) and managed accounts within one hundred twenty (120) days of that fund's fiscal year-end, or annually for each managed account.

Entoro Wealth encourages all clients to review these statements carefully and compare such official custodial records to the account statements that it may provide. Entoro Wealth's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

Entoro Wealth's offering documents and client engagement letters provide it with discretionary authority at the outset of the advisory relationship. In all cases, Entoro Wealth's exercise of discretion comports with the investment guidelines and restrictions stated in those offering and engagement documents. Entoro Wealth has full discretion to select the identity and amount of securities to be bought or sold. If any particular client seeks to impose investment guidelines and/or restrictions, those instructions must be provided to Entoro Wealth in writing prior to that client's engagement.

For investment companies that it advises, Entoro Wealth's authority to trade securities can also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Any client investment guidelines and restrictions must be provided in writing.

Entoro Wealth maintains a limited Power of Attorney for all discretionary accounts for directing and or effecting investments on behalf of the managed accounts, for the direct payment of fees and or the payment of commissions, custodial fees and or other charges incurred by the managed accounts.

Wrap Account Management

Entoro Wealth does not participate in the management of wrap account programs.

Item 17 - Voting Client Securities

Entoro Wealth's offering and engagement documents set forth the issues on which investors in the funds or in managed accounts may vote, or vote through duly executed, written proxies. Where Entoro Wealth has discretion to vote, it will vote its proxy, to the extent that it is able to form an opinion, in what it deems to be the best interest of the client.

Item 18 - Financial Information

Entoro Wealth has no financial commitments that impair its ability to meet contractual and fiduciary commitments to its clients, and it has not been the subject of a bankruptcy proceeding.