

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies

Form ADV Part 2A – Disclosure Brochure

Effective: February 11, 2021

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Bamboo Wealth is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Bamboo Wealth to assist you in determining whether to retain the Advisor.

Additional information about Bamboo Wealth and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD #170093.

**Spectrum Planning & Advisory Services Inc.
d/b/a Bamboo Wealth Strategies
3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108
Phone: (619) 289-9670
www.bamboowealthstrategies.com**

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Bamboo Wealth. For convenience, the Advisor have combined these documents into a single disclose document.

Bamboo Wealth believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Bamboo Wealth encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes:

There have been no material changes to the Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 170093. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Item 3 – Table of Contents

| | |
|---|-----------|
| Item 1 – Cover Page | 1 |
| Item 2 – Material Changes | 2 |
| Item 3 – Table of Contents | 3 |
| Item 4 – Advisory Services..... | 4 |
| Item 5 – Fees and Compensation | 6 |
| Item 6 – Performance-Based Fees and Side-by-Side Management..... | 9 |
| Item 7 – Types of Clients | 9 |
| Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss..... | 10 |
| Item 9 – Disciplinary Information | 11 |
| Item 10 – Other Financial Industry Activities and Affiliations..... | 11 |
| Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... | 12 |
| Item 12 – Brokerage Practices | 13 |
| Item 13 – Review of Accounts..... | 13 |
| Item 14 – Client Referrals and Other Compensation..... | 14 |
| Item 15 – Custody..... | 14 |
| Item 16 – Investment Discretion | 15 |
| Item 17 – Voting Client Securities | 15 |
| Item 18 – Financial Information | 15 |
| Form ADV Part 2B – Brochure Supplements | 17 |
| Privacy Policy | 30 |

Item 4 – Advisory Services

A. Firm Information

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). Bamboo Wealth is organized as a corporation under the laws of the State of California. Bamboo Wealth was founded in December 2013 and is owned and operated by Danielle L. Luster (President), Brentt A. Hoover (Chief Executive Officer) and Jeremy S. Martinson (Chief Financial Officer & Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Bamboo Wealth.

B. Advisory Services Offered

Bamboo Wealth offers investment advisory services to individuals, high net worth individuals, businesses, trusts, estates, charitable organizations, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Bamboo Wealth’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Bamboo Wealth provides customized investment advisory solutions for its Clients. This is achieved through frequent personal Client contact and interaction while providing discretionary investment management and related advisory services. Bamboo Wealth works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an allocation. Bamboo Wealth will then construct a portfolio, consisting primarily of low-cost diversified exchange-traded funds (“ETFs”), including ETFs in the gold precious metals and commodity sectors, foreign and domestic equities, and mutual funds to achieve the Client’s investment goals. The Advisor may also utilize real estate funds, including REITs, as well as bonds to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Bamboo Wealth’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Bamboo Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Bamboo Wealth evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Bamboo Wealth may, on occasion, redistributing investment allocations to diversify the portfolio. Bamboo Wealth may buy specific positions to increase sector or asset class weightings. The Advisor may employ cash positions as a possible hedge against market movement. Bamboo Wealth may sell positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Bamboo Wealth accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices.

Financial Planning Services

Financial planning services are designed to provide highly customized financial planning advice for the Client that will address the Client’s stated financial objectives and/or concerns. Bamboo Wealth Strategies will provide

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financial planning services to the Client, pursuant to a written financial planning agreement. The content and scope of the financial planning recommendations may include but will not be limited to: a net worth statement, a cash flow statement, analysis of the aforementioned, and a recommended course of action detailing the specific financial recommendations being made to help the Client achieve their stated financial goals and objectives. In addition, and/or in conjunction with the Client's stated financial goals and objectives, on an ongoing or fixed engagement basis, the following areas shall be addressed in the financial analysis and subsequent recommendations as applicable:

1. Financial Position (cash flow & debt structure management)
2. Income Tax Planning
3. Investment Planning
4. Employee Benefits Planning
5. Retirement Planning
6. Business Planning
7. Insurance Planning & Risk Management
8. Estate Planning

Bamboo Wealth is configured to provide for financial planning advice in two distinct methods as follows:

One Time Fixed Engagement – Development and delivery of customized financial advice tailored to the Client's unique financial objectives and circumstance. The financial advice will address the Client's specific and current financial objectives and/or concerns (not ongoing financial advice). Based on the need of the Client, a fixed engagement may also be narrow in scope (such as an engagement specifically focused on estate planning, business planning, or major purchase planning). In most circumstances, a personalized interactive financial planning website will be created and shared with the Client. This provides the Client with secure access to on demand financial reports that may include but are not limited to; cash flow, balance sheet, income statement, and retirement projections. The Client relationship in the fixed engagement financial planning capacity terminates once the recommendations addressing all the Clients specific financial objectives have been delivered to the Client and all questions and concerns regarding the recommendations have been addressed. Unless otherwise stated, the total timeframe for a fixed engagement shall not exceed 12 months.

Ongoing Financial Advice – This includes the development and delivery of customized financial advice as illustrated above in the One Time Fixed Engagement model, plus ongoing advice. Ongoing financial advice includes unlimited telephone and in person meetings to address any and all financial concerns of the Client. Also included are periodic meetings initiated by the Advisor to proactively address financial considerations and opportunities that may arise due to macroeconomic factors or potential changes in the Client's financial circumstance.

Bamboo Wealth may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Retirement Plan Advisory Services

Bamboo Wealth provides retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrolment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring

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- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance

These services are provided by Bamboo Wealth serving in the capacity of a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Bamboo Wealth's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging Bamboo Wealth to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Bamboo Wealth, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Bamboo Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Bamboo Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Bamboo Wealth will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Bamboo Wealth does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Bamboo Wealth.

E. Assets Under Management

As of December 31, 2020, the Advisor manages \$116,373,526 in Client assets, \$113,167,117 of which is managed on a discretionary basis and \$3,206,409 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Bamboo Wealth uses the average daily balance ("ADB") in the Client's account from the previous billing quarter to determine the value of assets under management for billing purposes. For account[s] where ADB (i.e. 529 plan) is not readily available, the value for billing purposes shall be the average of the beginning and ending account balances ("ABE") from the previous quarter ((beginning balance + ending balance)/2). Investment advisory fees are typically deducted from accounts during the first fourteen days of each quarter. Either ADB or ABE may be referred to as the billable account balance. Lower fees for comparable services may be available from other sources.

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Investment advisory fees are based on the following schedule:

| Assets Under Management (\$) | Annual Rate (%) |
|-------------------------------------|------------------------|
| \$0 to \$1,000,000 | 1.25% |
| \$1,000,001 to \$1,500,000 | 1.00% |
| \$1,500,001 to \$2,000,000 | 0.90% |
| \$2,000,001 to \$3,000,000 | 0.80% |
| Above \$3,000,000 | 0.70% |

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Fees may vary from the above fee schedule depending on the nature and complexity of each Client's circumstances, or with the inclusion of financial planning services. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Bamboo Wealth will be independently valued by the Custodian. Bamboo Wealth will not have the authority or responsibility to value portfolio securities.

Fees for certain fee-based annuities are billed quarterly, at the end of the quarter. Fees are calculated based on quarter-end valuations of the annuity as provided by the Custodian. Fees will be deducted from the Client accounts[s] by the Custodian. Clients provide written authorization permitting advisory fees to be deducted by the Custodian directly from their account[s] and paid out to the Advisor as part of the investment advisory agreement and separate account forms provided by the Custodian. The Custodian shall send a quarterly invoice indicating the amount of the fees to be deducted from the Client Account(s).

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses as described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

The cost for financial planning services and/or providing ongoing financial planning advice for one year's time is between \$1,500 and \$20,000. Fees may also be charged on an hourly basis at a rate ranging from \$250 to \$500 per hour. Fees are negotiable and are based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. Bamboo Wealth is configured to charge a fee for financial planning advice in the following distinct methods:

One Time Fixed Engagement – Clients may be charged on a fixed fee or hourly basis depending on the needs of the Client. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services. Unless otherwise stated, the total timeframe for services delivered on an hourly basis or fixed engagement fee shall not exceed 12 months.

Ongoing Financial Advice – Clients may be charged a one-time plan setup fee with a monthly or annual fee for ongoing advice depending on the needs of the Client.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged a fixed engagement fee billed quarterly either in advance or arrears, depending on the terms of the retirement plan advisory agreement. Fixed engagement fees range from \$1,500 to \$20,000. Fees may be negotiable depending on the size and complexity of the Plan.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. Bamboo Wealth also offers Clients the ability to pay by credit card, debit card, check, or alternate advisory account. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the billable account balance multiplied by the annual rate divided by 4. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the

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responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Bamboo Wealth to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian. Bamboo Wealth also offers Clients the ability to pay investment advisory fees via credit card, debit card or check. In such instances, the Advisor will invoice the Client directly.

Financial Planning Services

Bamboo Wealth collects its fixed and hourly financial planning fees, either 50% in advance or 100% in advance. The monthly fee for ongoing financial advice is charged in advance on or around the 1st of each month. Monthly fees in the first month of service are prorated from the inception date to the end of the first month. Annual fees will be charged on or around the anniversary of the initiation of financial planning services. Bamboo Wealth offers Clients the ability to pay by credit card, debit card, check, or deduction from an advisory account, for any financial planning services. Bamboo Wealth will not collect an advance fee of \$1,200 or more for services that will take six (6) months or more to complete.

Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Bamboo Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. The investment advisory fee charged by Bamboo Wealth is separate and distinct from these custody and execution fees.

In addition, all fees paid to Bamboo Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Bamboo Wealth, but would not receive the services provided by Bamboo Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for the Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Bamboo Wealth to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Bamboo Wealth is compensated for its services in advance of the quarter in which investment management services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent. In the event that a Client's account has a change in the title only, the Advisor will not refund the billing for that quarter. However, the Advisor will not charge the new account for the remainder of the quarter.

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Financial Planning Services

Bamboo Wealth is compensated for its services in advance either in whole or in part. For ongoing financial planning services, Bamboo Wealth requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Bamboo Wealth is compensated for its services either at the beginning or at the end of the quarter in which retirement plan advisory services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid retirement plan advisory fees from the effective date of the termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Bamboo Wealth does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by an Advisory Person are separate and in addition to Bamboo Wealth's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through an Advisory Person. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Item 6 – Performance-Based Fees and Side-by-Side Management

Bamboo Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Bamboo Wealth are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Bamboo Wealth does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Bamboo Wealth offers investment advisory services to individuals, high net worth individuals, businesses, trusts, estates, charitable organizations, and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Bamboo Wealth generally does not impose a minimum size for establishing a relationship.

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

A. Methods of Analysis

Bamboo Wealth employs fundamental analysis and modern portfolio theory methods in developing investment strategies for its Clients. Research and analysis from Bamboo Wealth is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental Analysis

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed.

Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance.

The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Modern Portfolio Theory

Modern portfolio theory is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

As noted above, Bamboo Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Bamboo Wealth will often hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Bamboo Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, asset class, or the economy.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Bamboo Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are generally provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

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Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

REITs Risks

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Bamboo Wealth or its management person[s]. Bamboo Wealth values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD #170093.

Item 10 – Other Financial Industry Activities and Affiliations

Spectrum Consulting Group

Jeremy S. Martinson also owns and operates a separate business, Spectrum Consulting Group, which offers services to largely the same client base as Bamboo Wealth. This business provides bookkeeping, payroll processing, and other business-related services. Neither Mr. Martinson nor Spectrum Consulting Group have signatory authority for Client accounts.

Real Estate Broker

Brentt Hoover is also a California real estate broker. From time-to-time, he will offer Clients advice, transact real property, or receive a referral fee from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable transactions can conflict with the fiduciary duties of a registered investment adviser. Bamboo Wealth always acts in the best interest of the Client; including in the sale of commissionable products to Clients. Clients of Bamboo Wealth are in no way required to implement any recommendation through Mr. Hoover in his capacity as a real estate broker.

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Insurance Agency Affiliations

Jeremy S. Martinson, Danielle L. Luster, and Brentt A. Hoover are also licensed insurance professionals, conducting the majority of their fixed insurance business through Bamboo Insurance Services Inc. ("Bamboo Insurance"). In their individual capacity as insurance agents of Bamboo Insurance, these persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. They also receive revenue directly from Bamboo Insurance. Commissions and revenue generated by insurance sales do not offset the Advisor's investment advisory fees. Implementations of insurance recommendations are separate and apart from their role with Bamboo Wealth. This practice presents a conflict of interest as Jeremy S. Martinson, Danielle L. Luster, and Brentt A. Hoover have an incentive to recommend insurance products for the purpose of generating commission revenue for Bamboo Insurance rather than a recommendation solely based on Client's needs. Clients are under no obligation to purchase insurance products through Jeremy S. Martinson, Danielle L. Luster, and Brentt A. Hoover of Bamboo Wealth in their separate capacity as insurance agents through Bamboo Insurance.

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

A. Code of Ethics

Bamboo Wealth has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Bamboo Wealth ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to the Clients. Bamboo Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Bamboo Wealth's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (619) 289-9670 or via email at info@bamboowealth.com.

B. Personal Trading with Material Interest

Bamboo Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Bamboo Wealth does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Bamboo Wealth does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Bamboo Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Bamboo Wealth requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Bamboo Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Bamboo Wealth, or any Supervised Person of Bamboo Wealth, transact in any security to the detriment of any Client.**

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies

3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108

Phone: (619) 289-9670

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Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Bamboo Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Bamboo Wealth to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Bamboo Wealth does not have the discretionary authority to negotiate transaction costs on behalf of Clients on a trade-by-trade basis.

Where Bamboo Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fees by the Advisor for using a custodian not recommended by Bamboo Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Bamboo Wealth may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. Bamboo Wealth will generally recommend that Clients establish accounts with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), FINRA registered broker-dealer and member SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. The Advisor receives some benefits from TD Ameritrade through its participation in the program.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **Bamboo Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Bamboo Wealth does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Bamboo Wealth will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Bamboo Wealth will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Bamboo Wealth will execute its transactions through the Custodian as directed by the Client.

Bamboo Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies

3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108

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Securities in Client accounts are monitored on a regular and continuous basis by Danielle L. Luster, Brentt A. Hoover and Jeremy S. Martinson, the Principal Officers of Bamboo Wealth. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. All financial planning engagements are reviewed and approved by Jeremy S. Martinson, Chief Compliance Officer. Financial Planning advice provided to Clients is also reviewed by at least one Principal Officer prior to delivery.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Bamboo Wealth if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Bamboo Wealth

Participation in Institutional Advisor Platform

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

Bamboo Wealth does not engage paid solicitors for Client referrals.

Item 15 – Custody

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<http://www.bamboowealthstrategies.com>

Bamboo Wealth does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Bamboo Wealth to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the account Custodian and compare to any reports provided by Bamboo Wealth to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

Bamboo Wealth generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Bamboo Wealth. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Bamboo Wealth will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Bamboo Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Bamboo Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of Bamboo Wealth to meet all obligations to its Clients. Neither Bamboo Wealth, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Bamboo Wealth may collect fees for financial planning up to a year in advance. However, is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement

for

Jeremy Scot Martinson, CFP®
Chief Financial Officer and Chief Compliance Officer

Effective: February 11, 2021

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Jeremy S. Martinson (CRD# 4587392) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) (CRD # 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 246-1172 or by email at info@bamboowealth.com.

Additional information about Mr. Martinson is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4587392.

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Phone: (619) 289-9670
<http://www.bamboowealthstrategies.com>

Item 2 – Educational Background and Business Experience

Jeremy S. Martinson, born in 1977, is dedicated to advising Clients of Bamboo Wealth as Chief Compliance Officer and Chief Financial Officer. Mr. Martinson earned a Bachelor's of Science in Business Administration (Finance) from San Diego State University in 2000 and earned a Master of Science Business Administration (Finance) from San Diego State University in 2005. Additional information regarding Mr. Martinson's employment history is included below.

Employment History:

| | |
|---|--------------------|
| Chief Financial Officer & Chief Compliance Officer, Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies | 12/2013 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc. | 08/2014 to 04/2020 |
| Investment Advisor Representative, New England Securities | 06/2013 to 12/2013 |
| Director of Financial Planning, MetLife Securities, Inc. | 11/2002 to 12/2013 |

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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Phone: (619) 289-9670

<http://www.bamboowealthstrategies.com>

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Martinson. Mr. Martinson has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Martinson.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Martinson.

However, the Advisor encourages Clients to independently view the background of Mr. Martinson on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or by his individual CRD# 4587392.

Item 4 – Other Business Activities

Other Affiliations

Mr. Martinson also owns and operates a separate business, Spectrum Consulting Group, which offers services to largely the same client base as Bamboo Wealth. This business provides bookkeeping, payroll processing, and other business-related services. Neither Mr. Martinson nor Spectrum Consulting Group have signatory authority for client accounts.

Additionally, Mr. Martinson serves as the Chief Financial Officer, Chief Operating Officer and Secretary of SummaCor Inc. a startup company working on developing several implantable medical devices related in the cardiovascular space. Mr. Martinson has oversight of all aspects of the financial and operational happenings of the company. Mr. Martinson is compensated and spends approximately 25 hours per month in this capacity.

Additionally, Mr. Martinson also serves as a Member of Spectrum Capital Investments LLC, an entity that holds residential rental real estate, and Medical Centre Partners LLC, an entity that holds commercial and residential rental real estate. Mr. Martinson also owns several parcels of real property where he collects rents and pays expenses associated with the properties.

Mr. Martinson also serves on the board of directors of several non-profit organizations. These include acting as Secretary for the John P. Martin Foundation, Parliamentarian of The La Mesa-Dale PTA, Treasurer of the Greater Pacific Foundation, CEO of the La Mesa Community Kids Foundation, Chairman of the Strong Foundation for La Mesa Spring Valley Schools, and Director of the La Mesa Spring Valley Education Foundation. Mr. Martinson is also a Commissioner on the La Mesa-Spring Valley School District Personnel Commission.

Insurance Agency Affiliations

Mr. Martinson is also a licensed insurance professional, conducting the majority of his fixed insurance business through Bamboo Insurance Services Inc. Implementations of insurance recommendations are separate and apart from Mr. Martinson's role with Bamboo Wealth. As an insurance professional, Mr. Martinson will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Martinson also receives compensation directly from Bamboo Insurance. Mr. Martinson is not required to offer the products of any particular insurance company. Commissions and other revenue generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies or recommending the implementation of insurance products through Bamboo Insurance. Clients are under no obligation to implement any recommendations made by Mr. Martinson or the Advisor. Client are also under no obligation to implement any recommendation through Bamboo Insurance.

Item 5 – Additional Compensation

Mr. Martinson has additional business activities where compensation is received that are detailed above Item 4.

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies
3131 Camino Del Rio North, Suite 1000, San Diego, CA 92108
Phone: (619) 289-9670
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Item 6 – Supervision

Jeremy Martinson serves as Chief Compliance Officer and Chief Finance Officer of Bamboo Wealth. Mr. Martinson can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

BAMBOO WEALTH STRATEGIES
STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement
for

Danielle L. Luster, CFP®, RICP®
President

Effective: February 11, 2021

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Danielle L. Luster (CRD# 1946873) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) (CRD# 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Additional information about Ms. Luster is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her individual CRD# 1946873.

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<http://www.bamboowealthstrategies.com>

Item 2 – Educational Background and Business Experience

Danielle L. Luster, born in 1967, is dedicated to advising Clients of Bamboo Wealth as the President. Ms. Luster earned a Bachelor of Arts, Urban Studies and Planning from the University of California, San Diego in 1991. Additional information regarding Ms. Luster's employment history is included below.

Employment History:

| | |
|--|--------------------|
| President, Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies | 09/2014 to Present |
| Financial Services Representative & Investment Advisor Representative, MetLife Securities, Inc. | 10/2009 to 08/2014 |
| Registered Representative, Allstate Financial Services | 04/2004 to 10/2009 |

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

RICP® – Retirement Income Certified Professional®

The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning, maximizing Social Security and

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other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 85-year heritage and the highest form of academic accreditation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Luster. Ms. Luster has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Luster.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Luster.

However, the Advisor encourages Clients to independently view the background of Ms. Luster on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for her full name or her individual CRD# 1946873.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Luster is also a licensed insurance professional, conducting the majority of her fixed insurance business through Bamboo Insurance Services Inc. Implementations of insurance recommendations are separate and apart from Ms. Luster's role with Bamboo Wealth. As an insurance professional, Ms. Luster will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Luster also receives compensation directly from Bamboo Insurance. Ms. Luster is not required to offer the products of any particular insurance company. Commissions and other revenue generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies or recommending the implementation of insurance products through Bamboo Insurance. Clients are under no obligation to implement any recommendations made by Ms. Luster or the Advisor. Client are also under no obligation to implement any recommendation through Bamboo Insurance.

Item 5 – Additional Compensation

Ms. Luster has additional business activities where compensation is received that are detailed above Item 4.

Item 6 – Supervision

Ms. Luster serves as the President of Bamboo Wealth and is supervised by Mr. Martinson in his capacity as Chief Compliance Officer. Mr. Martinson can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Form ADV Part 2B – Brochure Supplement

for

Brentt A. Hoover, CFP®, ChFC®, CLU®, CASL®, RICP®
Chief Executive Officer

Effective: February 11, 2021

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Brentt A. Hoover (CRD# 4740664) in addition to the information contained in the Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies (“Bamboo Wealth” or the “Advisor”) (CRD # 170093) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Bamboo Wealth Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (619) 289-9670 or by email at info@bamboowealth.com.

Additional information about Mr. Hoover is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4740664.

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<http://www.bamboowealthstrategies.com>

Item 2 – Educational Background and Business Experience

Brentt A. Hoover, born in 1974, is dedicated to advising Clients of Bamboo Wealth as Chief Executive Officer. Mr. Hoover earned an Associate General Education from San Diego Mesa College in 2000, and a Bachelor of Science in Business Administration (Financial Services) from the San Diego State University in 2002. Mr. Hoover also earned a Certificate in Personal Financial Planning from San Diego University in 2002. Additional information regarding Mr. Hoover's employment history is included below.

Employment History:

| | |
|---|--------------------|
| Chief Executive Officer, Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies | 09/2014 to Present |
| Financial Services Representative & Investment Advisor Representative, MetLife Securities, Inc. | 03/2004 to 08/2014 |
| United States Marine Corps | 08/1993 to 08/1997 |

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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About the Chartered Financial Consultant® (“ChFC®”)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Demonstrate mastery of the core financial planning knowledge required of a CERTIFIED FINANCIAL PLANNER by passing the CFP® certification exam
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

About the Chartered Life Underwriter (“CLU®”)

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

Program Learning Objectives

- Provide guidance to clients on types and amounts of life insurance needed
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients

CASL® – Chartered Advisor for Senior Living®

MINIMUM REQUIREMENT:

- Candidates must pass an examination for the following five required courses:
 - o 328: Investments
 - o 330: Fundamentals of Estate Planning
 - o 350: Understanding the Older Client
 - o 351: Health and Long-Term Care Financing
 - o 352: Financial Decisions for Retirement
- As a general rule, candidates should plan to spend 50-70 hours studying for each course. The program can be completed as quickly as a candidate desires, but most students complete their designation requirements within 15-24 months.
- Each exam is a two-hour, 100 questions, and computer-administered exam.
- Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required; an undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.
- Each designee must complete 15 hours of continuing education every two years, with the additional condition that at least 10 of these hours should be in course work directly related to the course work required to obtain this designation.

The CASL® credential provides advisors with in-depth training on issues impacting seniors and those

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planning for retirement. The designation incorporates five required, college-level courses that represent an average total study time of more than 250 hours. Topics include investments, estate planning, health and long-term care financing, and financial decisions for retirement. CASL® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 87-year heritage and the top level of academic accreditation.

RICP® – Retirement Income Certified Professional®

The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning, maximizing Social Security and other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator with an 85-year heritage and the highest form of academic accreditation.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hoover. Mr. Hoover has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hoover.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hoover.

However, the Advisor encourages Clients to independently view the background of Mr. Hoover on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or his individual CRD# 4740664.

Item 4 – Other Business Activities

Other Affiliations

Mr. Hoover is also a California real estate broker. From time-to-time, he will offer clients advice, transact real property, or receive a referral fee from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable transactions can conflict with the fiduciary duties of a registered investment adviser. Bamboo Wealth always acts in the best interest of the Client; including in the sale of commissionable products to Clients. Clients of Bamboo Wealth are in no way required to implement any recommendation through Mr. Hoover in his capacity as a real estate broker.

Mr. Hoover owns a rental real estate property where he collects rent and pays expenses associated with the property.

Insurance Agency Affiliations

Mr. Hoover is also a licensed insurance professional, conducting the majority of his fixed insurance business through Bamboo Insurance Services Inc. Implementations of insurance recommendations are separate and apart from Mr. Hoover's role with Bamboo Wealth. As an insurance professional, Mr. Hoover will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hoover also receives compensation directly from Bamboo Insurance. Mr. Hoover is not required to offer the products of any particular insurance company. Commissions and other revenue generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies or recommending the implementation of insurance products through Bamboo Insurance. Clients are under no obligation to implement any recommendations made by Mr. Hoover or the Advisor. Client are also under no obligation to implement any recommendation through Bamboo Insurance.

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Item 5 – Additional Compensation

Mr. Hoover has additional business activities where compensation is received that are detailed above Item 4.

Item 6 – Supervision

Mr. Hoover serves as a Chief Executive Officer of Bamboo Wealth and is supervised by Jeremy Martinson in his capacity as Chief Compliance Officer. Mr. Martinson can be reached at (619) 289-9670.

Bamboo Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Bamboo Wealth. Further, Bamboo Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Bamboo Wealth and its Supervised Persons. As a registered entity, Bamboo Wealth is subject to examinations by regulators, which may be announced or unannounced. Bamboo Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

BAMBOO WEALTH STRATEGIES

STRENGTH / FLEXIBILITY / LONGEVITY

Spectrum Planning & Advisory Services Inc.
3131 Camino Del Rio North, Suite 1000, San Diego, California, 92108
(619) 289-9670 info@bamboowealth.com

PRIVACY POLICY

Effective: February 11, 2021

Our Commitment to You

Spectrum Planning & Advisory Services Inc. d/b/a Bamboo Wealth Strategies ("Bamboo Wealth" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Bamboo Wealth (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

| | |
|--|---------------------------------|
| Social security or taxpayer identification number | Assets and liabilities |
| Name, address and phone number[s] | Income and expenses |
| E-mail address[es] | Investment activity |
| Account information (including other institutions) | Investment experience and goals |

What Information do we collect from other sources?

| | |
|---|---|
| Custody, brokerage and advisory agreements | Account applications and forms |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others | Other information needed to service account |

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they

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receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| Basis For Sharing | Do we share? | Can you limit? |
|--|--------------|----------------|
| Servicing our Clients We may share non-public personal information with affiliated or non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, insurance agencies, other financial institutions) as necessary for us and our affiliates to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. | Yes | No |
| Marketing Purposes Bamboo Wealth does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. We will not share information for marketing purposes. | No | Not Shared |
| Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s], such as power of attorney or trustee. | Yes | Yes |
| Information About Former Clients Bamboo Wealth does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients. | No | Not Shared |

State-specific Regulations

| | |
|------------|--|
| California | In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws. |
|------------|--|

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (619) 289-9670.