

ABUNDANCE

WEALTH COUNSELORS

Firm Brochure Dated: March 29, 2021

This brochure provides information about the qualifications and business practices of Abundance Wealth Counselors. If you have any questions about the contents of this brochure, please contact us at 800.253.3760. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Abundance also is available on the SEC's website at www.adviserinfo.sec.gov.

Abundance is a registered investment advisor. Registration of an investment adviser does not imply any level of skill or training, and you should not choose an investment adviser solely on the basis of its status as a registered investment adviser. Please consider the information provided to you in oral and written communications to determine whether to hire or retain an investment adviser and to evaluate an investment adviser's qualifications and business practices.

Item 2: Material Changes

As of the date of this brochure there are no material changes to be disclosed.

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Item 4: Advisory Business

Abundance is a full-service, SEC registered investment advisor, located in State College, PA, and formed in 2001 by Richard DeFluri, who is the principal and owner of the firm.

Abundance provides private wealth management services in a family office setting to its clients on an ongoing basis. The firm manages client wealth in a holistic manner, handling and coordinating all aspects of a client's financial life, and taking into account the tax, estate, and asset protection implications, in addition to other life factors. Abundance not only takes these factors into consideration when managing investments, but also provides advice on risk management, personal cash flow, estate, tax, asset protection, retirement, business planning, and other topics in which we are competent. Abundance will also provide ancillary services to clients and their families in areas such as estate administration, asset distribution, loan & trust administration, and private banking services. Additionally, Abundance will provide advice on, and/or offer to clients, investment opportunities in private investment offerings where appropriate for the client and consistent with the client's goals and objectives.

Abundance also implements and advises on the investments of retirement plans for both organizations and individuals. Abundance can act in a fiduciary or a non-fiduciary capacity when providing services to retirement plans, can manage the investment of the assets on a discretionary or non-discretionary basis, can provide advice on investment choices when not managing the investment, and can provide both participant and plan-level services and advice.

Abundance manages client investments on a discretionary basis. In addition, the firm has power of attorney on client assets under management, allowing for assets to be transferred out of and between accounts. Because Abundance has custody of client assets due to power of attorney, the firm undergoes an annual surprise custody audit, performed by an outside accounting firm on an annual basis.

Foundation Premium Income Fund, LP

Abundance is a joint owner of Foundation Premium Income GP, LLC which acts as the general partner for a pooled investment vehicle, Foundation Premium Income Fund, LP (the "Fund"). The Fund's investment program involves selling option contracts on fundamentally evaluated individual securities and attempt to hedge risks. Clients may be invited to invest in the private placement, but only if the Fund is appropriate for the client. Investments in the Fund will be made on a non-discretionary basis only. Foundation Premium Income GP, LLC charges a management fee to the Fund (please see Item 5 for details). The assets in the pooled vehicle are managed in accordance with the Fund's offering documents. Clients invested in the Fund should

carefully consult the Fund's governing documents for information related to the Fund's investment program and risks.

As of February 28, 2020, Abundance actively managed \$932,671,677 million of client assets on a discretionary basis including Foundation Premium Income Fund, LP, and \$3,398,289 million of client assets on a non-discretionary basis.

Item 5: Fees and Compensation

The annual fee for investment management is charged as a percentage of assets under management, plus where applicable, certain fixed annual fees as described below.

to certain investments where they are disclosed to the client by Abundance. The deployed capital amount, verified valuation, or the market value in cases where there is liquidity, will factor into determining the investment management fee.

Fixed annual fees are assessed as follows:

Cash/Checking/Money Market Assets	\$50 annual fee, billed monthly in advance
ILIT / Loan Administration Services	\$350 annual fee, billed annually in advance

Abundance excludes certain assets when calculating management fees and will identify such assets and inform the client when this situation applies. The assets excluded will not be taken into consideration when determining the management fee tier.

Abundance requires a minimum client balance of \$1 Million in assets under management. This requirement may be waived upon review of the client's individual circumstances and relationship to Abundance or its clients. Abundance also maintains the ability to waive or negotiate fees with clients based on a variety of factors.

Fees are deducted at the beginning of each month, or if a client chooses, they will be billed and may pay the invoice using outside funds. The monthly fee is determined by the account balance at the end of the previous month. Fee schedules are reviewed monthly and updated based on the previous month's assets under management. The fees billed by Abundance are only for advisory services provided by Abundance, and do not include broker commissions, mutual fund expenses, or other trading and investment related expenses. Those fees are in addition to the investment advisory fee charged by Abundance.

It is important to know that Abundance Risk Management is an affiliated entity which sells insurance products on a commission basis. Clients of Abundance may be referred to Abundance Risk Management for insurance needs, but are not required to purchase insurance from that entity. Abundance Risk Management receives commissions on insurance policies that it writes.

Abundance requires that clients sign a Client Service Agreement which sets forth the nature and terms of the agreement, including the fee schedule. Abundance does not collect unearned fees in excess of \$1,200 not expected to be earned within 6 months. A Client Service Agreement may be terminated by either party for any reason upon receipt of 30 days written notice. All fees billed in advance will be refunded on a pro-rata basis.

Clients should be aware that similar advisory services may be available from other investment advisors for similar or lower fees.

