

VENTURA WEALTH MANAGEMENT

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A SEC Registered Advisory Firm¹

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This brochure provides information about the qualifications and business practices of Ventura Wealth Management (“Ventura Wealth”). If you have any questions about the content of this brochure, please contact us at 866.899.0068 and/or www.venturawealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Ventura Wealth is available on the SEC’s website at www.sec.gov.

¹ SEC or State registration does not and should not imply any certain level of skill or training.

Item 2. MATERIAL CHANGES

There have not been any material changes to Ventura Wealth's advisory business or personnel since the filing of its 2020 Annual ADV Amendment.

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Item 4. ADVISORY BUSINESS

Ventura Wealth is primarily owned by its founder and President of Nick Ventura and Chief Operating Officer Daniel McElwee. Nick's career spans over forty years in the field of investment management, and many of the firm's clients have been with him from the start. Nick's areas of expertise include portfolio strategy, asset allocation, and advanced financial planning. Nick is a CERTIFIED FINANCIAL PLANNER™ and a Certified Private Wealth Advisor.

Daniel McElwee is a graduate of The College of New Jersey and earned an MBA from the Kenan-Flagler Business School at the University of North Carolina Chapel Hill. At UNC, Dan completed concentrations in investment management, corporate finance, and global marketing. He is a graduate of New York University's Financial Planning Certificate Program and is a CFP.

Ventura Wealth has more than \$365 million dollars in assets under management, on both a discretionary and non-discretionary basis.

Financial Planning Services:

Ventura Wealth provides its clients with financial planning and consultation services (e.g., review of goals and objectives, analysis and recommendations for cash flow planning, asset allocation/investment planning, income tax planning, insurance planning, estate planning, retirement planning, education planning, real estate/mortgage planning, etc.).

Investment Management Services:

Ventura Wealth provides investment management services on a discretionary basis according to the investment objectives of the client and in accordance with the terms and conditions of the Investment Advisory Agreement between the Ventura Wealth and the client. Based upon the client's stated investment objectives, Ventura Wealth's investment management focuses on the use of Portfolio Models in order to provide investment returns consistent with clients' investment goals and objectives. Based upon a particular Model Portfolio, Ventura Wealth will invest client's accounts in certain percentages amongst numerous asset classes (e.g. stocks, corporate and government bonds, ETFs, mutual funds and alternate investments) in order to maximize client's investment returns while achieving lower volatility within pre-determined risk parameters. The following are the primary model portfolios currently offered by Ventura Wealth:

Current Income Portfolio:

This portfolio may include either a barbell or ladder portfolio of individual securities with the aim of providing current income within market-driven duration parameters. This portfolio seeks to preserve principal, provide current income, and a managed maturity schedule. The portfolio can be structured to be either tax-free through municipal bonds or taxable by using specific securities types such as corporates, Treasuries, or mortgage-backed securities. At times, based on market conditions, the portfolio will incorporate other income producing securities such as REITs, ETFs, MLPs, etc.

Moderate Allocation:

The moderate allocation portfolio is a growth and income portfolio. The model is

appropriate for investors that are drawing on the account, as it is designed to generate current income. The model uses mutual funds, ETF's, individual positions, with appropriate alternative assets.

Global Balanced:

The global balanced portfolio is a total return portfolio. It invests in a combination of mutual funds, ETFs, and individual holdings. It has a global reach beyond that of a traditional 60/40 split. In addition to equity and fixed income positions, it may hold positions in alternative investments.

Core Equity

The core equity portfolio is an all-equity model based on the S&P 500. The model purchases individual securities, ETF's, and mutual funds. Macroeconomic trends, along with sector specific events, lead to under or overweight positions. The portfolio manager seeks to purchase high-caliber companies that are considered "best of class" to compose the majority of this model's holdings. We may utilize options as a hedging strategy.

Global Alpha:

The global alpha portfolio is a theme-based, unconstrained model. The portfolio managers seek to identify macro-themes among asset classes and markets. The model has the ability to significantly overweight specific asset classes in an attempt to deliver an absolute return irrespective of market conditions. The portfolio may invest in individual securities, ETF's, mutual funds, and other investment vehicles. We may utilize options alternative assets as a hedging strategy.

DART (The Dynamic Asset Rotation Timing Portfolio):

The DART portfolio is a tactical asset allocation model. Its goal is to outperform the 60% S&P 500/40% Aggregate Bond Index split over time by reducing downside risk. The portfolio's beta is adjusted in response to market volatility. It has the ability to own a broad spectrum of asset classes. The DART strategy invests exclusively in ETFs and is rebalanced monthly.

Other Terms & Conditions:

Prior to engaging Ventura Wealth to provide any investment advisory services, the client will be required to enter into a formal *Agreement* with Ventura Wealth setting forth the terms and conditions under which Ventura Wealth shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Both Ventura Wealth's *Agreement* and the custodial/clearing agreement authorize the custodian to debit the account for the amount of the Ventura Wealth's investment advisory fee and to directly remit that management fee to Ventura Wealth. In the event that Ventura Wealth bills the client directly, payment is due upon receipt of Ventura Wealth's invoice. The *Agreement* between Ventura Wealth and the client will continue in effect until terminated by either party. In the event the client terminates Ventura Wealth's services, the balance of any unearned fee, if any, shall be refunded to the client.

Item 5. FEES AND COMPENSATION

Financial Planning Fees:

Ventura Wealth's financial planning and consulting fees are negotiable, but generally range from \$250 to \$500 on an hourly rate basis, and from \$2,000 to \$10,000 on a fixed fee basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s). Prior to engaging Ventura Wealth to provide financial planning or consulting services, clients will be required to enter into a *Financial Planning and Consulting Agreement* with Ventura Wealth setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Ventura Wealth commencing services.

Investment Management Fees:

Ventura Wealth's investment management fee schedule ("Advisory Fees") for accounts managed by Ventura Wealth is based on a percentage of assets (generally net of any debit balances) and is set forth below. The Advisory Fees represent the highest fee that may be charged absent special circumstances:

<u>Advisory Assets</u>	<u>Annual Fee</u>
0 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.25%
\$1,000,001 - \$5,000,000	1.00%
All assets in excess of \$5 million	Negotiable

Ventura Wealth's Advisory Fees shall also be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. Ventura Wealth's actual fees may be negotiated, and a client may pay more or less than similar clients depending on the particular circumstances of the client, which may include considerations related to size of the client's account, additional and/or differing levels of service or as negotiated. Clients that negotiate fees may end up paying a higher fee than that set forth in the fee schedules above as a result of fluctuations in the client's assets under management and/or account performance.

Ventura Wealth will generally recommend a broker-dealer/custodian for client's investment management assets. In addition to the investment management fee, the client may incur brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual securities transactions). In addition, the client will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses). Client may also incur additional investment management fees assessed by independent managers.

Item 6. PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT

Ventura Wealth does not charge performance-based fees.

Item 7. TYPES OF CLIENTS

Ventura Wealth provides investment advisory services to the following clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates, Charitable Organizations;
- Corporations
- Pension Plans & 401(k)

Minimum Account Size

As a condition for starting and maintaining a relationship, Ventura Wealth generally imposes a minimum portfolio size of \$500,000 for its Investment Management Services. Ventura Wealth, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and *pro bono* activities. Ventura Wealth only accepts clients with less than the minimum portfolio size if, in its sole opinion, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance.

Item 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Ventura Wealth's research process incorporates fundamental, quantitative, and technical analysis. We use several sources of independent, objective research as well as conduct our own proprietary research. Our portfolio management process emphasizes asset allocation and risk control strategies. Ventura Wealth analyzes the current global macroeconomic situation and then analyze individual markets and sectors for the purpose of making allocation decisions. Individual investment positions and portfolios are monitored consistently and adjusted as necessary in response to prevailing market risk factors.

In creating a financial plan, clients of Ventura Wealth are consulted to determine their risk profile. Annually, clients are asked to provide information on changes to their risk profile, as well as their financial health. Savings rates, withdrawal rates, and other major cash flows are monitored regularly. Sophisticated financial plans are created using analytical software to help guide the placement of assets into appropriate investment vehicles. Client education seminars and materials are provided regularly to promote client awareness of applicable financial topics and fluctuations in the global financial markets.

Ventura Wealth does not guarantee the future performance of any account or any specific level of performance, the success of any investment decision or strategy that Ventura Wealth may use, or the success of Ventura Wealth's overall investment management. All investment decisions are subject to various markets, currency, economic, political, and business risks, and that those investment decisions will not always be profitable. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Ventura Wealth if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Ventura Wealth's previous recommendations and/or services.

Item 9. DISCIPLINARY INFORMATION

Ventura Wealth and its personnel have not been the subject of any reportable disciplinary information.

Item 10. OTHER FINANCIAL INDUSTRY AFFILIATIONS

Ventura Wealth is affiliated with Ventura Wealth Insurance Services, LLC (VWIS"). VWIS and Ventura Wealth are owned by the same principals, Nick Ventura, Daniel McElwee and Tom Cahill. VWIS is an insurance agency in which certain of Ventura Wealth's advisory affiliates conduct insurance activities as forth below:

Licensed Insurance Representatives:

Ventura Wealth's Advisory Affiliates, in their individual capacities, are licensed insurance producers and may recommend the purchase of certain insurance products to its clients. Although Ventura Wealth does not sell insurance products, it permits its Advisory Affiliates as licensed insurance producers, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that Ventura Wealth's Advisory Affiliates recommend the purchase of insurance products and receive insurance commissions or additional compensation as a result. Such conflict is disclosed at time of sale and in this Brochure to the client.

Registered Representative of Broker-Dealer:

Ventura Wealth's Advisory Affiliates, in their individual capacities are registered representatives of American Portfolios Financial Services Inc ("American Portfolios"), an SEC registered broker-dealer and member of FINRA. Brokerage commissions may be charged by American Portfolios to effect securities transactions and thereafter, a portion of these commissions may be paid by American Portfolios to Ventura Wealth's Advisory Affiliates. Prior to effecting any transactions, the client will be required to enter directly into an account agreement with American Portfolios. The brokerage commissions charged by American Portfolios may be higher or lower than those charged by other broker-dealers. In addition, certain of the Ventura Wealth's Advisory Affiliates may also receive additional ongoing 12b-1 fees from the mutual fund company.

A conflict of interest exists to the extent that the Ventura Wealth recommends the purchase of securities wherein its Advisory Affiliates receive commissions or other additional compensation as a result of clients purchasing securities based upon such recommendations.

For ERISA Accounts, Ventura Wealth will offset its advisory fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Ventura Wealth's Advisory Affiliates in their individual capacities as registered representatives of American Portfolios.

Item 11. CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Ventura Wealth or related persons may own an interest in, or buy and sell for their own account, the same securities that may also be held, purchased or sold in client accounts. In all cases, clients' orders are given priority. In no case shall the adviser or associate receive a better price or more favorable circumstance than a client. In some cases, the adviser may buy or sell a specific security for their own account, which the adviser does not consider appropriate for client accounts.

Ventura Wealth has implemented an investment policy relative to personal securities transactions. This investment policy is part of Ventura Wealth's overall Code of Ethics which serves to establish a standard of business conduct for all of Ventura Wealth's Associated Persons that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Ventura Wealth also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Ventura Wealth or any person associated with Ventura Wealth.

Ventura Wealth has adopted procedures to implement the firm's policy on personal securities transactions and reviews to monitor and ensure the firm's policy is observed, implemented properly, and amended or updated, as appropriate. Ventura Wealth's access persons primarily invest along with the firm's advisory clients within several investment models managed by the firm. These investment models are "block traded" such that all accounts (clients and access persons) receive the exact same price. Notwithstanding, when different investment models trade on the same day, an access person may receive a different price than the Firm's advisory clients. Any such price discrepancy is solely due to separate investment models executing block transactions at different times.

Item 12. BROKERAGE PRACTICES

1. Research and Other Soft Dollar Benefits:

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Ventura Wealth may receive from a broker-dealer/custodian (or a mutual fund company), without cost (and/or at a discount) support services and/or products, certain of which assist Ventura Wealth to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Ventura Wealth may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Ventura Wealth in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received assist Ventura Wealth in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Ventura Wealth to manage and further develop its business enterprise.

Ventura Wealth's clients do not pay more for investment transactions effected and/or assets maintained at a particular broker-dealer/custodian as a result of this arrangement. There is no corresponding commitment made by Ventura Wealth to any particular broker-dealer/custodian or to any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

2. Brokerage for Client Referrals:

Ventura Wealth does not receive client referrals from any broker-dealer custodian.

3. Directed Brokerage:

The client may direct Ventura Wealth to use a particular broker-dealer (subject to Ventura Wealth's right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-dealer, and Ventura Wealth will be unable to seek better execution services or prices from other broker-dealers or be able to "bunch" the client's transactions with orders for other client's accounts managed by Ventura Wealth. As a result, these clients may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Ventura Wealth seeks to execute orders for its clients fairly and equitably. Ventura Wealth follows written procedures pursuant to which it may, and to the extent consistent with Best Execution, combine purchase or sale orders for the same security for multiple clients (sometimes called "***bunching***") so that they can be executed at the same time. The procedures for bunching trades may differ depending on the particular strategy or type of investment. Ventura Wealth is not required to bunch or aggregate orders if it determines that bunching or aggregating is not practical.

When client orders are bunched by Ventura Wealth, the order will be placed with the broker-dealer custodian for execution. When a bunched order is completely filled, Ventura Wealth generally will allocate the securities purchased or proceeds of sale among participating accounts based on the purchase or sale order. Adjustments or changes may be made by Ventura Wealth under certain circumstances, such as to avoid odd lots or excessively small allocations. If the bunched order is filled at different prices, through multiple trades, generally all such participating accounts will receive the average price. When a bunched order is partially filled, Ventura Wealth's procedures provide that the securities are to be allocated in a manner deemed fair and equitable to clients.

Software and Support Provided by Financial Institutions

Ventura Wealth may receive from *TD Ameritrade*, without cost to Ventura Wealth, computer software and related systems support, which allow Ventura Wealth to better monitor client accounts maintained at *TD Ameritrade*. Ventura Wealth may receive the software and related support without cost because Ventura Wealth renders investment management services to clients that maintain assets at *TD Ameritrade*. The software and related systems support may benefit Ventura Wealth, but not its clients directly. In fulfilling its duties to its clients, Ventura Wealth endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Ventura Wealth's influence Ventura Wealth's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services. Additionally, Ventura Wealth may receive the following benefits from *TD Ameritrade* through their respective investment adviser divisions: receipt of

duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its investment adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

TD Ameritrade Institutional Program

Ventura Wealth participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/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. Ventura Wealth receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 of this ADV Part 2A

Item 13. REVIEW OF ACCOUNTS

Account reviews are conducted on an ongoing basis by Ventura Wealth's principal, Nick Ventura. All investment management clients are required to discuss with Ventura Wealth their investment objectives, needs and goals and to keep him informed of any changes. All clients are encouraged to meet at least annually with the adviser to review financial planning issues, including investment objectives and performance.

Item 14. CLIENT REFERRALS AND OTHER COMPENSATION

As disclosed under Item 12 above, Ventura Wealth participates in TD Ameritrade's institutional customer program and Ventura Wealth may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Ventura Wealth's participation in the program and the investment advice it gives to its Clients, although Ventura Wealth 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 Ventura Wealth 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 Ventura Wealth by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Ventura Wealth's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Ventura Wealth but may not benefit its Client accounts. These products or services may assist Ventura Wealth in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Ventura Wealth manage and further develop its business enterprise.

The benefits received by Ventura Wealth 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, Ventura Wealth endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Ventura Wealth or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Ventura Wealth's choice of TD Ameritrade for custody and brokerage services.

Ventura Wealth also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Ventura Wealth is participating in the program. Specifically, the Additional Services include payment for Thinkpipes, a third-party firm that assists Ventura Wealth in its ability to provide advisory services to its clients. TD Ameritrade provides the Additional Services to Ventura Wealth in its sole discretion and at its own expense, and Ventura Wealth does not pay any fees to TD Ameritrade for the Additional Services. Ventura Wealth and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Ventura Wealth's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Ventura Wealth, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Ventura Wealth's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Ventura Wealth, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Ventura Wealth may have an incentive to recommend to its Clients that the assets under management by Ventura Wealth be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Ventura Wealth's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

Ventura Wealth has entered into a Solicitor Agreement. The percentage of the advisory fee to be paid to the Solicitor is jointly determined by Ventura Wealth and the Solicitor, based primarily on the projected amount of investment advisory services that will be provided to the advisory Client. Ventura Wealth's advisory fees do not differ between referred and non-referred accounts but are determined based on the level of assets managed. Certain terms of the agreement with the Solicitor are disclosed in writing to referred Clients in a Solicitor's Disclosure Statement Pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended.

Item 15. CUSTODY

Ventura Wealth does not maintain physical custody client assets. Ventura Wealth engages several qualified, nationally recognized SEC registered broker-dealers to custody and safe keep client assets. Ventura Wealth's *Agreement* and/or the separate agreement with its custodian may authorize Ventura Wealth through such custodian to debit the client's account for the amount of Ventura Wealth's fee and to directly remit that management fee to Ventura Wealth. Such an arrangement is considered to be by Custody. In accordance with applicable custody rules, the custodians recommended by Ventura Wealth have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account.

Ventura Wealth effects third party asset transfers in client accounts using a Standing Letter of Authorization (“SLOA”). Pursuant to the SEC No Action Letter, Ventura Wealth is deemed to have Custody over these accounts. Accordingly, Ventura Wealth has instituted procedures and controls such that it can comply with the seven representations noted in the SEC No-Action letter and avoid the annual surprise audit requirement. Additionally, since many of the seven representations involve the qualified custodian’s operations, Ventura Wealth is in close collaboration to ensure compliance with the SEC guidance.

Item 16. INVESTMENT DISCRETION

Ventura Wealth primarily provides advisory services on a discretionary basis. Ventura Wealth is considered to exercise discretion over a client’s account if it can effect transactions without first having to seek client consent. Ventura Wealth is given this limited power of attorney authority in the Advisory Agreement executed by the client. Clients may request a limitation on this authority (such as certain securities not be bought or sold) subject to Ventura Wealth’s acceptance of such limitation.

Item 17. VOTING CLIENT SECURITIES

Ventura Wealth does not vote client proxies. Ventura Wealth’s clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client’s investment assets. Ventura Wealth and the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client’s investment assets.

With respect to shareholder class action litigation and similar matters, Ventura Wealth generally will not make any filings in connection with any shareholder class action lawsuits involving securities currently or previously held in clients’ accounts. Ventura Wealth recommends that its clients promptly review these materials, as they identify important deadlines and may require action in the client’s part. Ventura Wealth will not be required to notify third party custodians or clients who utilize third party custodians of shareholder class action lawsuits and similar matters.

Item 18. FINANCIAL INFORMATION

Based upon Ventura Wealth’s business practices, use of a qualified custodian and advisory fee procedures, the SEC does not require the disclosure of financial information. Please be advised that there are no known financial conditions that would impair Ventura Wealth’s ability to meet contractual commitments to clients.

Ventura Wealth has not been the subject of any bankruptcy petition or filing.