

Accretive Wealth Management, LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Accretive Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (925) 365-1533 or by email at: faraz.sattar@accretivewealth.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 Accretive Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Accretive Wealth Management, LLC's CRD number is: 164341

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Accretive Wealth Management, LLC on March 27, 2020 are described below. Material changes relate to Accretive Wealth Management, LLC's policies, practices or conflicts of interests only.

- Accretive Wealth Management, LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

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Item 1: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

Accretive Wealth Management, LLC is a Limited Liability Company organized in the state of California. The firm was formed in April 24, 2012, and the principal owner is Faraz Sattar.

B. Types of Advisory Services

Accretive Wealth Management, LLC (hereinafter "AWM") offers the following services to advisory clients. Before a portfolio is constructed for a client, AWM works to create a "Life Plan." A Life Plan is a planning process which allows AWM to understand the client's objectives, need for income or cash, investment time frame and risk tolerance.

Investment Advisory Services

AWM offers ongoing portfolio management services based on the Life Plan of each client. The Life Plan aids in the selection of a portfolio that matches each client's specific situation. Investment Advisory Services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| - Investment strategy | - Personal investment policy |
| - Asset allocation | - Asset selection |
| - Risk tolerance | - Regular portfolio monitoring |
| - Business succession | - Retirement Planning |
| - Education Planning | - Risk Management |
| - Gifting | |

A Life Plan is offered to all clients although not all clients will select A Life Plan. AWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. AWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement. Depending upon the complexity of the financial plan AWM may refer the client to an unaffiliated financial planning organization. AWM will not charge a fee to refer to an unaffiliated financial planning organization or share in a fee charged by an unaffiliated financial planning

organization. AWM will ensure that any referred financial planning organization is properly licensed or registered.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Pension Consulting Services

AWM uses third party pension administrators for all plans. We use Hicks Pension Services and Retirement Security Advisor Council.

AWM offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Selection of Other Advisers

AWM may direct clients to third party money managers. Clients will pay a separate fee to the third party money managers. The combined fees of AWM and the third party money managers will not exceed any limit imposed by any regulatory agency. Before selecting other advisers for clients, AWM will always ensure those other advisers are properly licensed or registered as an investment adviser.

Services Limited to Specific Types of Investments

AWM primarily limits its investment advice to private placements. However, AWM will also provide advice regarding mutual funds, equities, bonds, fixed income, debt securities, ETFs, hedge funds, REITs, insurance products including annuities, and government securities. AWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

AWM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. AWM does not participate in any wrap fee programs.

E. Amounts Under Management

AWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 129,883,579.00	\$ 20,118,760.00	02/28/2021

Item 5: Fees and Compensation

A. Fee Schedule

Investment Advisory Services Fees

Total Assets Under Management	Annual Fee
First \$500,000	1.50%
Next \$500,000	1.25%
Next \$2,000,000	1.00%
Next \$2,000,000	0.75%
Next \$5,000,000	0.65%
Over \$10,000,000	Negotiable

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days' written notice.

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Lower fees for comparable services may be available from other sources.

Selection of Other Advisers Fees

AWM will direct clients to third party money managers. Clients will pay a separate fee to the third party money managers. The fees will be disclosed in each contract between AWM and the client and each third party adviser and the client. The combined fees will not exceed any limit imposed by any regulatory agency. Fees will vary depending on the third party adviser. Client should review the ADV Part 2A of the third party adviser for additional information.

Financial Planning Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$500 and \$5,000. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Fees charged by a referred unaffiliated financial planning organization will be by a separate fee agreement and AWM will not charge a fee for the referral and will not share in any fees charged by the unaffiliated financial planning organization.

Pension Consulting Services Fees

The rate for pension consulting services is up to 1.00% of the plan assets for which AWM is providing such consulting services. These fees are negotiable.

Performance-based Fees

AWM does charge performance-based fees in limited circumstances. Only qualified investors will be charged performance based fees.

B. Payment of Fees

Payment of Investment Advisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears.

Payment of Other Advisers' Fees

Other Advisers' fees are withdrawn directly from the client's accounts with client written authorization. Fees withdrawn will vary depending on the third-party adviser. Clients should review the ADV Part 2A of the third-party adviser for additional information.

Payment of Financial Planning Fees

Fixed Financial Planning fees are paid via check in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

Payment of Pension Consulting Services Fees

Pension consulting fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client and clients may select the method in which they are billed. Fees are paid quarterly in arrears.

Payment of Performance based fees

Performance based fees will be charged on an annual basis and in arrears.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, Platform fees, etc.). Those fees are separate and distinct from the fees and expenses charged by AWM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

AWM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither AWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

AWM does charge performance based fees in limited circumstances. Performance fees will only be charged to qualified investors and discussed with each client prior to incurring the performance-based fees.

The formula for performance fees is a range of up to 20% of any net gains in the account after a twelve month period with no hurdle rate. The negotiated rate will be stated in the advisory contract of the client. The base for the calculation will be the initial deposit in the account. The ensuing twelve month period base will be the prior ending value of the account minus the performance fee charged. Clients may terminate the contract without penalty, for full refund, within five business days of signing the contract. Thereafter, clients may terminate the contract with thirty days' written notice. Clients must pay the prorated performance-based fees for the billing period in which they terminate the contract up to and including the day of termination.

AWM manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) as well as accounts that are NOT billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because AWM or its supervised persons have an incentive to favor accounts for which AWM and its supervised persons receive a performance-based fee. AWM addresses the conflicts by ensuring that clients who have performance-based accounts do not receive preferential treatment. AWM provides best execution practices and upholds its fiduciary duty for all clients.

Clients that are paying a performance-based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

Item 7: Types of Clients

AWM generally provides investment advice and management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Small Businesses
- ❖ Corporate/Institutional Clients

Minimum Account Size

There is an account minimum, \$500,000, which may be waived by the investment adviser, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AWM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. AWM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

AWM uses long term trading and short term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

AWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. AWM invests in private equity, private real estate, private debt, hedge funds and QOZs.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Hedge Funds are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

Private Equity Funds: In addition to the risks associated with hedge funds, there are risks specifically associated with investing in private equity. Capital calls can be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Private placements carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

Precious Metal ETFs (Gold, Silver, and Palladium Bullion backed “electronic shares” not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither AWM nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AWM nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither AWM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AWM will direct clients to third party money managers. Clients will pay a separate fee to the third party money managers. The fees will be disclosed in each contract between AWM and the client and each third party adviser and the client. The combined fees will not exceed any limit imposed by any regulatory agency. AWM will always act in the best interests of the client, including when determining which third party manager to recommend to clients. AWM will ensure that all recommended advisers or managers are licensed or notice filed in the states in which AWM is recommending them to clients.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

AWM does not recommend that clients buy or sell any security in which a related person to AWM or AWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AWM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of AWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AWM will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian will be chosen based on their relatively low transaction fees and access to mutual funds and ETFs. AWM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

AWM recommends the custodians Equity Advisr Solutions and Millennium Trust Company.

1. Research and Other Soft-Dollar Benefits

AWM receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions (“soft dollar benefits”).

2. Brokerage for Client Referrals

AWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

AWM will require clients to use a specific broker-dealer to execute transactions. We don’t require unless it’s a tax-deferred investment. We may start back in the future,

B. Aggregating (Block) Trading for Multiple Client Accounts

AWM maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing AWM the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least annually by Faraz Sattar. Faraz Sattar is the chief advisor and is instructed to review clients’ accounts with regards to their investment policies and risk tolerance levels. All accounts at AWM are assigned to this reviewer.

AWM is not currently creating, maintaining or monitoring financial plans. If financial planning services resume, AWM will ensure financial planning accounts are reviewed on a regular basis.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a quarterly written report that details the client's account including assets held and asset value from the custodian. The client will receive a portfolio performance report from the portfolio manager on a quarterly basis.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits as described in Item 12 above, AWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to AWM clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

AWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

AWM, with client written authority, has limited custody of client's assets through direct fee deduction of AWM's Fees only. If the client chooses to be billed directly by the Custodian, AWM would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

For those client accounts where AWM provides ongoing supervision, the client has given AWM written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides

AWM discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

AWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

AWM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

AWM has not been the subject of a bankruptcy petition in the last ten years.