



Brochure Form ADV Part 2A Item 1 - Cover Page

Generations Wealth, LLC

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March 31, 2023

This Brochure provides information about the qualifications and business practices of Generations Wealth, LLC. If you have any questions about the contents of this Brochure, please contact us at (513) 834-8056 or pamela.clark@generationswealth.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Generations Wealth, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Generations Wealth, LLC also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

Annual Update:

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's brochure, the adviser is required to notify clients and provide a description of the material changes. Generally, we will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

Material Changes You Should Know:

The last annual updating amendment of our Form ADV Part 2 ("Disclosure Brochure") dated March 28, 2022, has been updated as of March 31, 2023. Material changes since the last update include:

- Item 8 to specifically address retirement plan rollovers or transfers that are covered under a new Department of Labor ("DOL") rule and related Exemption 2020-02 ("PTE 2020-02").

Additionally, we have made other changes, some of which may clarify or enhance existing disclosures, but we do not consider these other changes to be material.

Full Brochure Available:

The revised Disclosure Brochure will be available since our last delivery or posting of this Disclosure Brochure on the SEC's public disclosure website (IAPD) at www.adviserinfo.sec.gov or you may contact us at (513) 834-8056 or pamela.clark@generationswealth.com to obtain a copy. When an update is made to this Disclosure Brochure, we will send a copy to you with the summary of material changes, or a summary of material changes that includes an offer to send you a copy [either by electronic means (email) or in hard copy form].

Item 3 - Table of Contents**Page**

Item 1 - Cover Page.....	1
Item 2 - Material Changes	1
Item 3 - Table of Contents.....	2
Item 4 - Advisory Business.....	3
Item 5 - Fees and Compensation.....	5
Item 6 - Performance-Based Fees and Side-By-Side Management.....	7
Item 7 - Types of Clients.....	7
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	7
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.....	15
Item 14 - Client Referrals and Other Compensation	16
Item 15 - Custody.....	16
Item 16 - Investment Discretion	17
Item 17 - Voting Client Securities	17
Item 18 - Financial Information	17
Brochure Supplements.....	Exhibit A

Item 4 - Advisory Business

General Information

Generations Wealth, LLC (Generations Wealth) has been in business since 2006 and provides a variety of investment, income tax, financial planning, and Personal CFO Services. These are described in more detail below.

Pamela Clark is the principal owner of Generations Wealth. Please see ***Exhibit A - Brochure Supplement*** for more information on this principal owner and other individuals who formulate investment advice and have direct contact with clients or have discretionary authority over client accounts.

As of December 31, 2022, Generations Wealth managed assets totaling \$244,436,115 which is all on a discretionary basis and \$0 on a non-discretionary basis.

SERVICES PROVIDED

Investment Services

Investment Plan

Generations Wealth will prepare an Investment Plan that incorporates the client's financial circumstances, risk capacity, and risk tolerance with their investment goals. This plan includes a financial outline based on the clients "Financial Profile" or "Profile" and an "Investment Policy Statement" or "IPS" to describe their investment objectives and guidelines.

The Financial Profile is a reflection of the client's current financial picture and a look to the future investment goals of the client. The IPS outlines the investment strategy and types of investments Generations Wealth recommends in meeting those goals.

The client is under no obligation to act upon any of the recommendations made by Generations Wealth under an Investment Plan or to engage the services of Generations Wealth or any recommended professional.

Investment Retainer

Upon completion of the Investment Plan, the client may choose to retain Generations Wealth on an ongoing basis. The Investment Retainer may include:

- Investment Plan implementation
- Portfolio management
- Portfolio accounting
- Performance and allocation reporting
- Cashiering and transfers
- Account administrative services

Under the Investment Retainer, the Profile and IPS are discussed regularly with the client, which does not necessarily result in a written document. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Generations Wealth based on updates to the client's financial or other circumstances.

Generations Wealth's investment services are largely based on academic studies and research that indicates that markets are efficient and advocates the benefits of using a passive, index-oriented approach to investing. For additional information about how Generations Wealth invests, please see ***Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.***

To implement the client's IPS, Generations Wealth will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Generations Wealth will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Generations Wealth in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Generations Wealth.

Income Tax Services

Income Tax Plan

Generations Wealth will prepare an Income Tax Plan to identify strategies to optimize the client's current income tax situation, simplify the process of tax compliance, and address future tax risks. This plan includes a projection of current-year tax liabilities/refunds and specific strategy recommendations.

The client is under no obligation to act upon any of the recommendations made by Generations Wealth under an Income Tax Plan or to engage the services of Generations Wealth or any recommended professional.

Income Tax Retainer

Upon completion of the Income Tax Plan, the client may choose to retain Generations Wealth on an ongoing basis. The Income Tax Retainer may include:

- Prepare and file federal, state, and local tax returns
- Tax payment processing and tracking
- Tax data organization and archiving
- Tax planning and optimization
- Tax notice and audit support

Financial Planning Services

Financial Plan

Generations Wealth will prepare a Financial Plan to address one or more areas of a client's financial situation, which may include:

- Analysis of goals and financial situation
- Retirement planning
- Education planning

- Estate planning
- Investment planning
- Income tax planning
- Risk management and insurance analysis

The client is under no obligation to act upon any of the recommendations made by Generations Wealth under a Financial Plan or to engage the services of Generations Wealth or any recommended professional.

Personal CFO

Personal CFO Retainer

Generations Wealth's Personal CFO Retainer involves overseeing all aspects of a client's wealth management. The Personal CFO Retainer may include:

- Personal financial advocate
- Coordination of investment, tax, financial planning, risk, and other specialties
- Comprehensive financial planning analysis, strategy, and implementation
- Financial statement analysis and reporting
- Budgeting and cash flow analysis
- Accounting and bill pay
- Financial data organization and archiving
- Document management

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Generations Wealth are exclusive of all custodial and transaction costs paid to the client's custodians, brokers or other third- party consultants. Please see ***Item 12 – Brokerage Practices*** for additional information. Fees paid to Generations Wealth are also separate and distinct from the fees and expenses charged by mutual funds, exchange traded funds ("ETFs") or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Generations Wealth and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Either Generations Wealth or the client may terminate the Retainer Agreement at any time, subject to any written notice requirements in the Agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the services were provided, and any fees due to Generations Wealth from the client will be invoiced or deducted from the client's account prior to termination.

Fee Description

As a fee-only firm, fees from clients are the sole source of Generations Wealth's compensation. Our fees are calculated as a percentage of assets accordingly to one of the (3) schedules below.

"Blueprint" Portfolio Value	Generations Wealth Advisory Fee
First \$800,000	0.75%
Above \$800,000	0.00%

"Compass" Portfolio Value	Generations Wealth Advisory Fee
First \$1,000,000	\$7,500
\$1,000,000 - \$10,000,000	0.75%
Above \$10,000,000	0.00%

"Cornerstone" Net Worth Value	Generations Wealth Advisory Fee
First \$7,000,000	\$35,000
\$7,000,000 - \$20,000,000	0.50%
Above \$20,000,000	0.00%

Generations Wealth will charge a one-time setup fee of between \$1,500 and \$5,000 depending on level of planning service chosen. For clients who choose an ongoing retainer relationship with us, the planning fee is also called a setup fee because it is required at the onset of a new client relationship. The planning (or setup) fees may include an Income Tax Plan and/or Investment Plan and/or a Financial Plan. The planning (or setup) fees are paid half in advance and the balance following the completion of the work.

Tools

Blueprint clients will utilize Schwab's Intelligent Portfolio platform. This is a digital platform that provides automated, algorithm-driven investment services with little to no human supervision. Once the clients risk profile is determined, the service leverages tailored funds chosen by Generations Wealth and provides automated and regular rebalancing and tax-loss harvesting (for portfolios greater than \$50,000 invested).

Compass and Cornerstone clients will be professionally managed using Generations Wealth's integrated suite of tools.

Fee Invoice

For all types of ongoing advisory services, the client will be charged at the end of each calendar quarter for advisory services rendered. For Blueprint and Compass clients, fees are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the average daily balance of the account for the preceding calendar quarter. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. The average daily balance is calculated using an industry standard third-party software application. The average daily closing balance calculation for the previous quarter is then multiplied by the annual management fee. The computed annual management fee (Avg Daily Balance * Management Fee) is divided by 4 and then applied for that quarter. For Cornerstone clients, Net Worth is calculated at least annually but no more frequently than quarterly. The Net Worth amounts used in the calculation is the same as what is reported to the client as Net Worth on a quarterly routine basis. Generations Wealth will deduct the quarterly fee from the client's investment portfolio; however, clients may elect to remit payment via check or ACH. In either instance, the client receives an invoice with the fee calculation.

Other Portfolio Expenses

Transaction Costs

Generations Wealth recommends a qualified third-party custodian to hold assets for clients. Clients are charged for all for custodial expenses (brokerage commissions or transaction fees) incurred on their behalf. These fees are levied by the custodian and charged directly to the client's account. Generations Wealth does not receive any income from custodial fees. Fees charged for buying and selling mutual funds and exchange traded funds (ETFs) generally range between no cost and \$20 per trade but may be higher.

Expense Ratios

All mutual funds and ETFs include a management fee paid to the investment manager of the fund. These fees and expenses are described in each fund's prospectus and generally include a management fee, other fund expenses and a possible distribution fee. Generations Wealth exclusively recommends low-cost, no-load funds. The current average-weighted expense ratio for a typical Generations Wealth portfolio approximates 0.26%.

Generations Wealth may, at its sole discretion, make exceptions to the foregoing or negotiate special fee arrangements where Generations Wealth deems it appropriate under the circumstances. Therefore, clients with similar assets under management and investment objectives may pay significantly higher or lower fees than other clients.

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

Generations Wealth does not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Generations Wealth has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Description

Generations Wealth generally serves individuals (high net worth to ultra-high net worth), families, trusts and institutional relationships (corporations, foundations, and qualified plans).

Account Minimums

Generations Wealth provides suggested account minimums for each service level; however, we allow clients to determine whether our services are appropriate for their needs. Therefore, Generations Wealth does not impose a minimum investment net worth requirement for individuals seeking services. However, portfolios below certain values are subject to a minimum fee. The minimum fee may result in an annual rate in excess of the stated rate.

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

Methods of Analysis

In accordance with the IPS, Generations Wealth client portfolios are generally comprised of passive

mutual funds offered by companies such as Dimensional Fund Advisors, Vanguard, and others, as well as ETFs.

Mutual funds and ETFs are generally evaluated and selected based on a variety of criteria, including, as applicable and without limitation: investment philosophy, expense ratio and other costs, tax characteristics, risk exposures, fund manager reputation and history, and other factors.

Fixed income investments may be used primarily to diversify equity investment risk and volatility, but also as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Generations Wealth will generally evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, credit risk, term risk, and issuer or fund manager.

Investment Strategies

Generations Wealth's strategic approach is to invest each portfolio in accordance with the IPS that has been developed specifically for each client. Securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Generations Wealth will invest a client's assets based on the following principles:

- Markets are efficient and assets are fairly priced.
- Risk and Return are directly related. Priced risk factors determine expected return.
- Investors should not expect to be compensated for taking risk that can be easily reduced through diversification.
- Portfolio structure (asset allocation) is the primary determinant of performance for a broadly diversified portfolio.
- Cost and performance are inversely related.

Generations Wealth does not engage in market forecasting, market timing, or stock picking. Generations Wealth's philosophy embraces the tenets of Modern Portfolio Theory, The Efficient Markets Hypothesis, and the Fama/French 5-Factor Model. Generations Wealth believes an efficient and cost-effective method of implementing a portfolio structured around priced risk factors is to use passively managed funds. The use of actively managed funds is not recommended because these funds may have holdings that vary across dimensions of risk, making portfolio structure difficult to maintain.

Generations Wealth's goal is to capture market-driven returns commensurate with a client's chosen level of risk. Generations Wealth should be judged by the ability to maintain a client's asset allocation to its intended structure, avoid unnecessary cost and taxation, and by the quality of our investment counsel.

For ongoing monitoring and portfolio rebalancing, Generations Wealth reviews each client's portfolio at least quarterly and rebalances their agreed-upon allocation on a contingent basis. In general, contingent rebalancing relies on an event to trigger the process. That event is typically a cash deposit or withdrawal or when a particular asset class deviates significantly from the intended target percentage. "Significantly" most often means a deviation of 15% to 25% on a relative basis or 5% on an absolute basis, but subject to the client's particular tax and risk circumstances. Generations Wealth believes the purpose of rebalancing is to maintain portfolio structure, not to enhance returns, and that performance is directly attributed to a client's exposure to risk. Rebalancing helps maintain consistent risk exposures.

IRA Rollover Recommendations

For the purpose of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02"), when applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under an exemption that requires us to act in your best interest and not put our interest ahead of yours. Under exemption, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Risk of Loss

While Generations Wealth seeks to diversify clients' investment portfolios across various asset classes consistent with their IPS in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money. Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Generations Wealth manages client investment portfolios based on Generations Wealth's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Generations Wealth allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that Generations Wealth's specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs, and Other Investment Pools. As described above, Generations Wealth may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Generations Wealth will generally invest portions of client assets directly into equity investments, primarily in pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Generations Wealth may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Generations Wealth may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Legal and Regulatory Matters Risks. Legal developments which may adversely impact investing and investment-related activities can occur at any time. "Legal Developments" means changes and other developments concerning foreign, as well as US federal, state and local laws and regulations, including adoption of new laws and regulations, amendment or repeal of existing laws and regulations, and changes in enforcement or interpretation of existing laws and regulations by governmental regulatory authorities and self-regulatory organizations (such as the SEC, the US Commodity Futures Trading Commission, the Internal Revenue Service, the US Federal Reserve and the Financial Industry Regulatory Authority). Our management of accounts may be adversely affected by the legal and/or regulatory consequences of transactions effected for the accounts. Accounts may also be adversely affected by changes in the enforcement or interpretation of existing statutes and rules by governmental regulatory authorities or self-regulatory organizations.

System Failures and Reliance on Technology Risks. Our investment strategies, operations, research, communications, risk management, and back-office systems rely on technology, including hardware, software, telecommunications, internet-based platforms, and other electronic systems. Additionally, parts of the technology used are provided by third parties and are, therefore, beyond our direct control. We seek to ensure adequate backups of hardware, software, telecommunications, internet-based platforms, and other electronic systems, when possible, but there is no guarantee that our efforts will be successful. In addition, natural disasters, power interruptions and other events may cause system failures, which will require the use of backup systems (off-site). To reduce the impact a system failure may have, we continually evaluate our backup and disaster recovery systems and perform periodic checks on the backup systems' conditions and operations. Despite our monitoring, hardware, telecommunications, or other electronic systems malfunctions may be unavoidable, and result in consequences such as the inability to trade for or monitor client accounts and portfolios. If such circumstances arise, the Investment Committee will consider appropriate measures for clients.

Cybersecurity Risk. A portfolio is susceptible to operational and information security risks due to the increased use of the internet. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyberattacks include, but are not limited to, infection by computer viruses or other malicious software code, gaining unauthorized access to systems, networks, or devices through “hacking” or other means for the purpose of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cybersecurity failures or breaches by third-party service providers may cause disruptions and impact the service providers’ and our business operations, potentially resulting in financial losses, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement, or other compensation costs, and/or additional compliance costs. While we have established business continuity plans and risk management systems designed prevent or reduce the impact of such cyberattacks, there are inherent limitations in such plans and systems due in part to the everchanging nature of technology and cyberattack tactics.

Pandemic Risks. The outbreak of the novel coronavirus rapidly became a pandemic and resulted in disruptions to the economies of many nations, individual companies, and the markets in general, the impact of which cannot necessarily be foreseen at the time. This created closed borders, quarantines, supply chain disruptions and general anxiety, negatively impacting global markets in an unforeseeable manner. The impact of the novel coronavirus and other such future infectious diseases in certain regions or countries may be greater or less due to the nature or level of their public health response or due to other factors. Health crises caused by the coronavirus outbreak and future infectious diseases may exacerbate other pre-existing political, social, and economic risks in certain countries. The impact of such health crises may be quick, severe and of unknowable duration. These pandemic and other epidemics and pandemics that may arise in the future, could result in continued volatility in the financial markets and could have a negative impact on investment performance.

As noted above, these risk factors are only the principal risks that we believe our clients’ investment portfolios face, but it is not intended to be a complete list or explanation of the risks involved in an investment strategy. Due to the dynamic nature of investments and markets, strategies may be subject to additional and different risk factors not discussed above.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of Generations Wealth or the integrity of Generations Wealth’s management. Generations Wealth has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Pamela Clark, Founder and Managing Member of Generations Wealth also serves as an outsourced financial professional for three private investment entities, New Vista Partners, LLC (“New Vista”), Eurovillage, LLC (“Eurovillage”), and Soimeni Parc SA (“Soimeni”). In addition, Ms. Clark owns a less than 2% interest in New Vista and Eurovillage and 12% interest bearing note receivable in Soimeni, of which are engaged in real estate development. From time to time and when appropriate in light of the client’s investment objectives and risk tolerance, Generations Wealth may recommend investments in New Vista, Eurovillage, Soimeni and/or its related entities. Ms. Clark’s role and ownership interest with these companies represents a conflict of interest when she invests, or recommends investment of, client assets into these companies. Although, neither Ms. Clark nor

Generations Wealth receive compensation for referring clients to New Vista, Eurovillage and Soimeni, Ms. Clark's ownership interest provides an incentive to recommend it to her clients. To mitigate any conflicts of interest that may arise from Ms. Clark's interest in these entities, clients will be provided a detailed offering memorandum explaining any conflicts of interest and providing extensive information about the opportunity. In addition, Generations Wealth does not assess an advisory fee on any balance invested in New Vista, Eurovillage, or Soimeni.

Generations Wealth does not recommend or select other investment advisers for our clients and receive compensation directly or indirectly from those advisers. In addition, Generations Wealth does not have other business relationships with those advisers.

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

Code of Ethics and Personal Trading

Generations Wealth has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Generations Wealth's Code has several goals. First, the Code is designed to assist Generations Wealth in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Generations Wealth owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Generations Wealth (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Generations Wealth's associated persons. Under the Code's Professional Standards, Generations Wealth expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Generations Wealth associated persons are not to take inappropriate advantage of their positions in relation to Generations Wealth clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Generations Wealth's associated persons may invest in the same securities recommended to clients. Under its Code, Generations Wealth has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

Because client accounts are invested almost exclusively in open-end mutual funds and ETFs, there is little opportunity for a conflict of interest between personal trades by Generations Wealth's associated persons and trades in client accounts, even when such accounts invest in the same securities. However, in the event of other identified potential trading conflicts of interest, Generations Wealth's goal is to place client interests first.

Consistent with the foregoing, Generations Wealth maintains policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions. If an associated person of Generations Wealth wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Generations Wealth's written policy.

Generations Wealth does not execute transactions on a principal or agency cross basis.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Generations Wealth seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Generations Wealth may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third-party research (or any combination) and may be used in servicing any or all of Generations Wealth's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Generations Wealth recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), TD Ameritrade Inc., (TD Ameritrade), or Fidelity Institutional Wealth Services ("Fidelity") (collectively "the Custodians"), all FINRA-registered broker-dealers, members SIPC, as qualified custodians to maintain custody of clients' assets. Generations Wealth may also effect trades for client accounts at the Custodians, or may in some instances, consistent with Generations Wealth's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although Generations Wealth may recommend that clients establish accounts at the Custodians, it is ultimately the client's decision to custody assets with the Custodians. Generations Wealth is independently owned and operated and is not affiliated with the Custodians.

The Custodians provide Generations Wealth with access to their institutional trading, custody, reporting and related services, which are typically not available to the Custodians' retail investors. The Custodians also make available various support services. Some of those services help Generations Wealth manage or administer our clients' accounts while others help Generations Wealth manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements but are part of the institutional platform offered by the Custodians. The Custodians' brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Generations Wealth client accounts maintained in its custody, the Custodians generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the Custodians or that settle into the Custodians' accounts. The Custodians also make available to Generations Wealth other products and services that benefit Generations Wealth but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Generations Wealth accounts, including accounts not maintained at the Custodians.

The Custodians' products and services that assist Generations Wealth in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of Generations Wealth's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

The Custodians also offer other services intended to help Generations Wealth manage and further develop its business enterprise. These services may include: (i) technology compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. The Custodians may make available, arrange and/or pay third-party vendors for the types of services rendered to Generations Wealth. The Custodians may discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Generations Wealth. The Custodians may also provide other benefits such as educational events or occasional business entertainment of Generations Wealth personnel. In evaluating whether to recommend that clients custody their assets at the Custodians, Generations Wealth may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by the Custodians, which may create a potential conflict of interest.

Directed Brokerage

Clients may direct Generations Wealth to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangements that Generations Wealth has with the Custodians are designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Generations Wealth to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Generations Wealth that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregated Trade Policy

Generations Wealth typically directs trading in individual client accounts as and when trades are appropriate based on the client's IPS, without regard to activity in other client accounts. However,

from time to time, Generations Wealth may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, Generations Wealth will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Generations Wealth or its officers, directors, or employees will be excluded first.

Administrative Trade Errors

From time-to-time, Generations Wealth may make an error in submitting a trade order on the client's behalf. Trading errors may include a number of situations, such as:

- The wrong security is bought or sold for a client,
- A security is bought instead of sold,
- A transaction is executed for the wrong account,
- Securities transactions are completed for a client that had a restriction on such security, or
- Securities are allocated to the wrong accounts.

When this occurs, Generations Wealth may place a correcting trade with the broker-dealer which has custody of the client's account. If an investment gain results from the corrective action, the gain will remain in the client's account unless it is legally not permissible for the client to retain the gain, or Generations Wealth confers with the client and the client decides to forego the gain (e.g., due to tax reasons). If a loss occurs due to our administrative trade error, Generations Wealth is responsible and will pay for the loss to ensure that the client is made whole.

Note: To limit the respective administrative expenses and burden of processing small trade errors, it should be noted some custodians (at their own discretion) may elect not to invoice Generations Wealth if the trade error involves a de minimis dollar amount (usually less than \$100). Generally, if related trade errors result in both gains and losses in your account, they may be netted.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Generations Wealth. These factors generally include, but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. All accounts are reviewed by Pamela Clark, Generations Wealth's Managing Member, or another Investment Adviser Representative on the team.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Generations Wealth provides at least a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

For those clients to whom Generations Wealth provides *Investment Consulting and Reporting on Held-Away Assets*, consultations are conducted on an as needed or agreed upon basis. Consultations are conducted by Pamela Clark, Managing Member, or another Investment Adviser Representative on the team. Generations Wealth provides written portfolio reports on a quarterly basis or upon request, depending on client preference.

When Generations Wealth provides separate financial planning and/or consulting services, reviews are conducted on an as needed or agreed upon basis. Such reviews are conducted by one of Generations Wealth's investment adviser representatives or principals.

Item 14 - Client Referrals and Other Compensation

As noted above, Generations Wealth receives an economic benefit from the Custodians in the form of support products and services they make available to Generations Wealth and other independent investment advisors whose clients maintain accounts at the Custodians. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of the Custodians' products and services to Generations Wealth is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither the Custodians nor any other party is paid to refer clients to Generations Wealth.

Item 15 - Custody

Schwab, TD Ameritrade, or Fidelity are the custodians of nearly all client accounts at Generations Wealth. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodians' responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Generations Wealth of any questions or concerns. Clients are also asked to promptly notify Generations Wealth if the custodian fails to provide statements on each account held.

Although Generations Wealth does not hold custody of any client funds or securities, Generations Wealth are deemed to have limited custody of some of our clients' funds or securities when the clients authorize Generations Wealth to deduct our management fees directly from the client's account. In addition, Generations Wealth are also deemed to have custody of clients' funds or securities when clients have standing letters of authorizations ("SLOAs") with their custodian to move money from a client's account to a third-party, and under that SLOA it authorizes Generations Wealth to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow.

Additionally, Generations Wealth will have access to username and password information for online access to certain client accounts, primarily Personal CFO Retainer clients. Generations Wealth will utilize this access to accounts for reporting purposes and report aggregation; in some cases, this access will be used to place buy and sell trades involving transactions needed for asset allocation conducted with the client's knowledge and authority. While online access to these accounts may give Generations Wealth the ability to withdraw funds or securities or transfer them to an account not in the client's name, Generations Wealth will not and would not conduct such transactions without obtaining direct authority from the client. Due to this authority, Generations Wealth have engaged an independent accountant to conduct an unannounced annual audit on these accounts.

From time to time and in accordance with our agreement with clients, Generations Wealth will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

Item 16 - Investment Discretion

As described in ***Item 4 - Advisory Business***, Generations Wealth will accept clients on a discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by the client, giving Generations Wealth the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and the withdrawal of advisory fees directly from the account. Generations Wealth then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Generations Wealth and the requirements of the client's custodian.

Item 17 - Voting Client Securities

As a policy and in accordance with Generations Wealth's client agreement, Generations Wealth does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Generations Wealth with questions relating to proxy procedures and proposals; however, Generations Wealth generally does not research proxy proposals.

Item 18 - Financial Information

Generations Wealth does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure with respect to this item.

As an advisory firm that maintains discretionary authority for client accounts, Generations Wealth are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Generations Wealth has no additional financial circumstances to report.

Generations Wealth has not been the subject of a bankruptcy petition at any time during the past ten years.

Exhibit A

Brochure
Supplement Form
ADV Part 2B Item 1 -
Cover Page
Pamela D. Clark, CPA, CFP®

CRD# 5156194

of

Generations Wealth, LLC

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March 31, 2023

This Brochure Supplement provides information about Pamela Clark, and supplements the Generations Wealth, LLC ("Generations Wealth") Brochure. You should have received a copy of that Brochure. Please contact us at (513) 834-8056 if you did not receive Generations Wealth's brochure, or if you have any questions about the contents of this Supplement.

Additional information about Pamela is available on the SEC's website at
www.AdviserInfo.sec.gov.

Item 2 - Educational Background and Business Experience

Pamela D. Clark (year of birth 1971) is Founder and Managing Member of Generations Wealth. Pamela began her career at Deloitte and Touche in 1994 and was ultimately promoted to a Tax Manager in 2000. Later she joined Truepoint Capital as a Senior Wealth Consultant. In 2006, Pamela founded **Generations Wealth Management, LLC** where she remained until 2014 when she co-founded Altiora Group, LLC. In 2018, Altiora Group, LLC. was renamed **Generations Wealth, LLC**.

Pamela received a BBA in Accounting from University of Cincinnati in 1994. She became a Certified Public Accountant* (CPA) in 1998 and she obtained her CERTIFIED FINANCIAL PLANNER™ certification** in 2005.

*A CPA is a Certified Public Accountant. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license to practice public accounting. While the exam is the same regardless of where it is taken, every state/jurisdiction has its own set of education and experience requirements that individuals must meet. However, most states require at least a bachelor's degree and a concentration in accounting, and at least one year of public accounting experience under the

supervision of or verification by a CPA. Once the designation is attained, the CPA is required to meet continuing education requirements.

****** The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Pamela has no such disciplinary information to report.

Item 4 - Other Business Activities

Pamela Clark, Founder and Managing Member of Generations Wealth also serves as an outsourced financial professional for three private investment entities, New Vista Partners, LLC ("New Vista"), Eurovillage, LLC ("Eurovillage") and Soimeni Parc SA ("Soimeni"). In addition, Ms. Clark owns a less than 2% interest in New Vista and Eurovillage, and 12% interest bearing note receivable in Soimeni, of which are engaged in real estate development. From time to time and when appropriate in light of the client's investment objectives and risk tolerance, Generations Wealth may recommend investments in New Vista, Eurovillage, Soimeni and/or its related entities. Ms. Clark's role and ownership interest with these companies represents a conflict of interest when she invests, or recommends investment of, client assets into these companies. Although, neither Ms. Clark nor Generations Wealth receive compensation for referring clients to New Vista, Eurovillage, and Soimeni, Ms. Clark's ownership interest provides an incentive to recommend it to her clients. To mitigate any conflicts of interest that may arise from Ms. Clark's interest in these entities, clients will be provided a detailed offering memorandum explaining any conflicts of interest and providing extensive information about the opportunity. In addition, Generations Wealth does not assess an advisory fee on any balance invested in New Vista, Eurovillage, or Soimeni.

Item 5 - Additional Compensation

Pamela has no other income or compensation to disclose.

Item 6 - Supervision

Pamela is the Founder and Managing Member Generations Wealth, and serves as the firm's Chief Compliance Officer, however; Pamela's personal trading is reviewed by Shawn Clark.

As Chief Compliance Officer, Pamela is responsible for providing compliance supervisory oversight to the staff. She may be contacted at (513) 834-8056.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Ryoichi Steven Tsuchiya

CRD# 3120557

of

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March 31, 2023

This Brochure Supplement provides information about Steve Tsuchiya, and supplements the Generations Wealth, LLC (“Generations Wealth”) Brochure. You should have received a copy of that Brochure. Please contact us at (513) 834-8056 if you did not receive Generations Wealth’s Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Steve is available on the SEC’s website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

Ryoichi Steven Tsuchiya (“Steve”) (year of birth 1972) is an Investment Consultant at Generations Wealth. Steve began his career as an Investment Specialist at Fidelity Brokerage Services in 1998. He later joined J.P. Morgan Chase Bank as a Client Advisor in 2010 where he served until joining Generations Wealth in 2018.

Steve received his degree in history from The Ohio State University in 1995.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Steve has no such disciplinary information to report.

Item 4 - Other Business Activities

Steve is engaged in various outside business activities including business venture designing art for commission and wholesale distribution; and writing/editing. Steve generally engages in these non-investment related business activities in a coordinated approach with his investment-related work.

Item 5 - Additional Compensation

Steve earns compensation from the outside business activities mentioned in Item 4 above.

Item 6 - Supervision

As Chief Compliance Officer, Pamela Clark is responsible for providing compliance supervisory oversight to Steve. She may be contacted at (513) 834-8056.