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## **Form ADV Part 2A Brochure**

### **OMNI 360 Wealth, Inc.**

777 Scudder Mills Road, Building 4, Ste 101  
Plainsboro, NJ 08536  
(609)452-0889  
<https://www.pfg-planning.com/>

### **Cover Page**

October 11, 2023

**This brochure provides information about the qualifications and business practices of OMNI 360 Wealth, Inc. If you have any questions about the contents of this brochure, please contact us [lindaf@pfg-planning.com](mailto:lindaf@pfg-planning.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 OMNI 360 Wealth, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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## **Item 2 Material Changes**

The material changes in this brochure from the last annual updating amendment of OMNI 360 Wealth, Inc. on 02/21/2023 are described below. Material changes relate to OMNI 360 Wealth, Inc.'s policies, practices or conflicts of interests.

- OMNI 360 Wealth, Inc. is now owned by OMNI 360 Advisors, LLC, which is the successor holding company of Princeton Financial Group, LLC.. The ownership of OMNI 360 Advisors, LLC is:

31.05%	James Colitsas, CPA
31.05%	Neel Shah
11.16%	Thomas Colitsas, EA, Public Accountant
17.01%	Linda J. Farinola, CFA, CFP(r), EA
5.41%	Joyce Morrison
3.87%	Nancy Crowe, CPA
- Neel Shah will be coming on as an advisor of OMNI 360 Wealth, Inc. effective November 1, 2023. He currently owns and manages Shah and Associates, P.C. (an estate planning law firm), Shah Total Planning, Inc and Beacon Wealth Solutions, LLC (Beacon) a registered investment advisor with the State of New Jersey. Beacon Wealth will be merging into OMNI 360 Wealth, Inc. effective November 1, 2023.
- PFG – Financial Planning & Management has updated its business name to OMNI 360 Wealth, Inc.

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### OMNI 360 Wealth, Inc. (SEC No. 124878)

#### **Item 4 Advisory Business**

OMNI 360 Wealth, Inc. (OMNI) was founded in 1996 by Linda J. Farinola (aka Linda J. Grant). There are three investment advisors (Linda J. Farinola, James G. Colitsas and Bryan P. Katz) and two administrative employees. The firm is located in New Jersey and registered with the SEC as a registered investment advisor.

Linda J. Farinola, Bryan P. Katz perform most of the investment advisory services for OMNI 360 Wealth, Inc. James Colitsas does have some communication with clients that were previously under his advisement.

OMNI 360 Wealth, Inc. provides financial planning and investment management services to individuals, families, small businesses and related entities. OMNI works with clients to define financial objectives and develop strategies for reaching those objectives. The areas of focus include: identification and prioritization of financial goals and potential problems, cash flow management and budgeting, education funding plans, retirement planning, estate planning, charitable goals, employee benefits, insurance needs, tax planning, investment and portfolio analysis and other financial issues specific to the client.

OMNI 360 Wealth, Inc. does provide investment advisory services on a discretionary basis as a stand-alone service. As part of that service, we do collect and analyze significant information about the client and set up investment guidelines and policies that are specific to that client and account.

The firm's compensation is solely from the fees paid directly by the clients. The firm does not receive commissions based on the client's purchase of any securities. No referral fees are paid or accepted. No financial benefits are received from custodians or broker-dealers based on the client security transactions ("soft dollar benefits").

Assets under direct management of OMNI are held by independent custodians, Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) in the client's name. OMNI does not hold client funds. OMNI is considered to have custody in some jurisdictions due to the fact that a) we do charge our fees directly to client accounts and b) we do move money between client accounts with proper authorization. This would include accounts from an individual to or from an account that is held by the client jointly with another. The SEC determined that these transfers constitute custody and has issued a no action letter that outlines conditions on how those transactions are handled. OMNI complies with those conditions which are outlined in the custody section of this report.

OMNI also offers investment advisory services to business retirement accounts as a Registered Investment Advisor. OMNI does not have discretionary authority on those plans which are held at various custodians.

We may recommend other professionals, (e.g. lawyers, accountants, insurance agents etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis. Conflicts of interest are disclosed to the client and the relationships are managed in the best interest of the client.

Linda J. Farinola is the president of OMNI 360 Wealth, Inc. and spends approximately 75% of her time as manager, chief compliance officer and investment advisor for the firm. Linda also performs some management duties (10%) for OMNI 360 Advisors, LLC. the indirect owner of OMNI - Planning & Management. Linda also performs tax planning and preparation services (10%) for OMNI 360 Tax, Consulting and Accounting which is also owned by OMNI 360 Advisors, LLC.

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### Principal Owners - see Material Changes

OMNI 360 Wealth, Inc. is now owned by OMNI 360 Advisors, LLC, . The ownership of OMNI 360 Advisors, LLC is

31.05%	James Colitsas, CPA
31.05%	Neel Shah
11.16%	Thomas Colitsas, EA, Public Accountant
17.01%	Linda J. Farinola, CFA, CFP(r), EA
5.41%	Joyce Morrison
3.87%	Nancy Crowe

### Types of Advisory Services

**Financial Planning** services are offered on a comprehensive, piecemeal, or hourly basis. A written evaluation of the client's current situation and their goals is provided to the client. OMNI works with the client to define financial objectives and develop strategies for reaching those objectives. The areas of focus include: identification and prioritization of goals, employee benefits, insurance needs, tax planning, investment and portfolio analysis and other issues specific to the client. The financial planning engagement also includes assistance with implementation of the recommendations accepted by the client. Telephone support and meetings occur as required typically for a one year period.

**Investment Management** is provided to clients mostly on a discretionary basis. OMNI works with clients to come up with investment guidelines that reflect the clients' needs, goals, temperament, and financial situation. Assets are then managed on an ongoing basis within the framework of the established guidelines. The guidelines outline the intended use for the funds, tax issues, asset allocation targets and ranges, benchmarks, permitted or prohibited assets or other client specific issues.

### *Use of Third-Party Service Provider*

OMNI 360 Wealth, Inc. (Omni) has retained Buckingham Strategic Partners, LLC ("BSP") to act as a sub-advisor for certain client accounts. BSP shall provide various model asset allocation portfolios (each a "Portfolio", collectively "Portfolios") for selection by Omni. Each Portfolio strives to achieve long-term risk and return objectives through diversification among multiple asset classes using investment options available to BSP, which may include, but not limited to, mutual funds and/ or exchange traded funds from Dimensional Fund Advisors LP, Bridgeway Capital Management, Inc., AQR Capital Management, LLC, The Vanguard Group, Inc., Stoneridge Asset Management, LLC or other providers selected by BSP. Each Portfolio is designed to meet a particular investment goal which Omni has determined is suitable based on the client's circumstances. Once the appropriate Portfolio(s) has been determined, the Portfolio will continuously be managed based on the portfolio's goal and BSP will have the discretionary authority to manage the Portfolio(s), including periodically rebalancing. However, Adviser, on behalf of its client, will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Should material life events occur, clients should immediately contact Omni to determine if changes to an account and the allocation of the assets held in the account are necessary.

In some cases, OMNI 360 Wealth selects Parametric Portfolio Associates ("Parametric"), LLC for sub- advisory management within client accounts. Parametric Portfolio Associates, LLC is an unaffiliated third-party sub-advisor owned by Eaton Vance Acquisitions, LLC a wholly owned indirect subsidiary of Morgan Stanley. Parametric shall manage the assets in accordance with the investment strategy and any customization selected by Omni for each client account. Parametric collaborates advisers to design and implement customized solutions through the application of equity, fixed income and derivative programs. Clients may impose restrictions on investments in securities or types of securities and set additional investment guidelines as they deem necessary through Omni. Clients where Parametric is implemented will receive disclosures related to Parametric and their separate and distinct fees.

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**Portfolio Analysis** is provided to some clients who choose to make their own investment decisions and initiate their own transactions. OMNI provides an analysis and recommendations for the client that are consistent with their objectives. We work to identify strengths, weaknesses and potential risks of a portfolio and find alternatives that would reduce the costs or risk, while maintaining or improving the potential gain of the portfolio.

**Concierge Services and Special Projects** may occasionally be undertaken that are not described in the other types of agreements.

**Treasury Management Services** are also provided to businesses. These services can include cash and investment management, banking service reviews, internal processes and controls, accounting and funding preparation and strategy.

### Types of Investments

In general, we offer advisory on publicly traded investments, where information about the investment is available to the public. This includes stocks, bonds, mutual funds and exchange traded funds (ETFs). We will on occasion review privately offered investments for a client if reliable information is made available to us. We also offer limited advice on 529 or Annuity sub accounts if the account's performance and holdings is available. We do not offer advice on Hedge Funds which do not publicly provide information about their strategies, objectives, holdings and outlook.

We tailor our advisory services to the needs of our clients. We invest a lot of time and resources to learn about our clients' entire financial position, goals, demographics and preferences. We advise clients based on their needs. Clients may impose restrictions on investing in certain securities or types of securities. For example, if a client does not like a certain company for moral or religious reasons, we do respect their wishes.

We do not participate in wrap fee programs.

As of August 31, 2023, we manage a total of \$150,637,115 on a discretionary basis and \$0 on a non-discretionary basis.

OMNI also advises on a number of 401(k) retirement plans that totaled approximately \$96,000,000.

### Item 5 Fees and Compensation

A. OMNI 360 Wealth, Inc. bases its fees on either:

- (1) A percentage of assets under management or
- (2) Hourly charges or
- (3) Fixed fees for a project such as a financial plan or portfolio analysis or
- (4) Subscription Services based on set fee

OMNI 360 Wealth, Inc. provides investment supervisory services in the form of discretionary asset management. We work with each client to establish mutually agreed upon investment guidelines for each account. These guidelines include allowable ranges for asset allocation, types of securities permitted or prohibited. OMNI then has discretionary authority to select monitor and trade the securities with those established guidelines.

The customary fee schedule for discretionary investment advisory services, expressed as an annual percentage of assets under management or account value are:

Up to \$1,000,000	100bp or 1.00% of market value
\$1,000,000 and up	75bp or 0.75% of market value

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For new households there is a minimum fee per year of \$1000. Fees are negotiable depending on the scope, complexity and frequency of client needs.

Fees for assets under management that are managed in house are charged on a quarterly basis in arrears.

Fee for assets under management that are handled through Buckingham Strategic Partners will be charged in advance. Clients will be refunded for any charges or time not applicable.

Financial Planning or non-discretionary investment advisory services are charged either on a fixed fee, hourly or subscription basis. The fixed fee for an initial plan with one year of follow up can range from \$1500 - \$18,000. Fees are billed when the initial plan is reviewed with the client.

Annual Updates of a financial plan range from \$1,000 - \$12,000 per year. The maximum deposit required for an annual retainer is \$500.

The standard hourly rate for financial planning services is \$320 for partners, \$280 for senior advisors, \$180 for junior advisors and \$90 for administrative staff. Hourly fees are billed either at the end of a project or on a monthly basis, depending on the time frame. Hourly rates may be discounted for clients under a fixed fee agreement.

The subscription based model is charged on a monthly or quarterly basis for clients who wish to pay a regular flat fee. They typically have regularly scheduled meetings and likely have significant assets that are not covered by an Assets under management agreement. The annual rate can range from \$1500 to \$36,000 a year depending on the scope and complexity of the arrangement.

Fees are negotiable. In general, fees are not billed until work has been performed. Agreements canceled within 5 business days are fully refundable. Cancellations after 5 days are partially refundable on a pro rata basis.

B. Clients may elect to have fees deducted from their account or pay separately by check, ACH or credit card. We encourage clients to have fees deducted as it allows us to focus on investing rather than collections. It also mitigates any conflicts that may arise if a customer does not pay their fees for an extended period. If clients elect to pay discretionary investment advisory by check, we require a retainer of not more than \$500- or 1-year fee, whichever is less.

C. Clients may also be subject to broker commission or custody fees. We work primarily with Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) who has no custody fees on publicly traded assets. We do not typically buy non-traded assets in client accounts, however, clients at times may either instruct us to purchase them or transfer them in from another custodian. Any additional trade or custody fees are disclosed at that time.

There are nominal commissions of stocks, some exchange traded funds and close end funds. Also, some open ended mutual funds have commissions associated with them. OMNI works to minimize the use of funds with commissions and consider the impact of any fees when choosing investments. We do not purchase investments with front or back end loads.

Refer to ITEM 12 that discusses brokerage for further information.

D. Clients are not required to pay fees in advance unless they do not allow for account deductions for discretionary services. If that occurs, we require the lesser of \$500- or 1-year fee.

E. OMNI and all of its employees or supervised persons do not collect compensation for the sale of securities or other investments under the OMNI umbrella.

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

OMNI 360 Wealth, Inc. does not use a performance-based fee structure because of the potential conflict of interest. Performance based compensation may create an incentive for the advisor to recommend an investment that may carry higher degree of risk to the client. However, the nature of the asset-based fees does allow OMNI 360 Wealth, Inc. to participate in the growth of the clients' wealth to some degree. This also means that our fees can decline when the client's portfolio declines in value.

### **Item 7 Types of Clients**

OMNI 360 Wealth, Inc. provides investment advice to the following types of clients:

- Individuals & Families
- Trusts & Estates
- Charitable Organizations
- Businesses
- Employee Benefit Plan Sponsors (Client relationships vary in scope and length of service.)

### **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

OMNI 360 Wealth, Inc. security analysis methods included fundamental, technical and cyclical analysis.

**Fundamental Analysis** is an analysis of the issuing institutions financial situation, growth potential, credit worthiness. This is our primary method of analysis. Its risk is that sometimes regardless of the fundamentals, securities may be mispriced due to external factors or market sentiment.

**Technical Analysis** is when you look at price, volume and other statistics or stochastics about a security. This analysis is almost blind to the underlying fundamentals. We use this method on a limited basis and only after we have reviewed the fundamentals.

**Cyclical Analysis** is when you look at a security and its characteristics in relation to where we are in a business cycle. Certain types of investments and some market sectors have historically performed better or worse at different points in the business cycle.

We use this method of analysis in our asset allocation moves.

The primary sources of information are:

- Financial media
- Inspections of corporate activities
- Research materials prepared by others
- Corporate rating services
- SEC filings
- Company press releases

### **Investment Strategies**

The investment strategies used to implement any investment advice given to a client is based on the needs, objectives and situation of the client and can include:

- Long term purchases
- Short term purchases
- Trading
- Margin transactions
- Options writing, including covered options, naked options, spread and straddle strategies.



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### Risk of Loss

All investments carry certain risks that are borne by the investor. Our investment approach attempts to minimize risk by diversification and by aligning the investments with the client's goals. With all investments, investors face risk including: loss of principal, interest rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk and financial risk.

### Item 9 Disciplinary Information

OMNI 360 Wealth, Inc. and its employees have not been involved in any legal or disciplinary events related to past or present activities.

### Item 10 Other Financial Industry Activities and Affiliations

#### Activities

OMNI 360 Wealth, Inc. does participate in tax planning, business consulting and treasury management for businesses.

#### Affiliations

OMNI 360 Advisors, LLC is owned by

31.05%	James Colitsas, CPA
31.05%	Neel Shah, Esq, CFP®
11.16%	Thomas Colitsas, EA, Public Accountant
17.01%	Linda J. Farinola, CFA, CFP(®), EA
5.41%	Joyce Morrison
3.87%	Nancy Crowe, CPA

#### **OMNI 360 Advisors, LLC. owns the following subsidiaries**

- OMNI 360 Wealth Inc. a registered investment advisor.
- OMNI 360 Tax, Consulting & Accounting, LLC an accounting firm performing tax, consulting and accounting services
- OMNI 360 Risk Management, LLC. a licensed NJ insurance agency. This company started to sell life and health insurance in 2018. As a result, OMNI is no longer a pure fee only firm.

Omni 360 CPAs formerly, Princeton Financial Group, LLC is related CPA firm is owned 51% by James G. Colitsas, CPA, 15% Thomas Colitsas, EA and Public Accountant, 22% by Linda Farinola, CFP(r), CFA, EA and 7% by Joyce Morrison and 5% by Nancy Crowe, CPA.

Linda J. Farinola is the founder, manager and former owner of OMNI 360 Wealth, Inc.. She is also licensed as a NJ Life Insurance Agent and a tax preparer and consultant for the Princeton Financial Group. Linda does not underwrite life insurance or receive commissions but does charge for tax planning and consulting services.

James G. Colitsas, CPA is a majority owner and manager of OMNI 360 CPAs, LLC. He is also part owner of OMNI 360 Advisors, LLC. He is also a registered investment advisory representative for OMNI 360 Wealth, Inc..

Jim is also holds a life and health insurance license.

Linda J Farinola and James G. Colitsas both have life insurance licenses in the State of New Jersey. We have our insurance licenses so that we can offer advice about insurance as part of the financial planning done with OMNI 360 Wealth, Inc.. Neither Linda, Jim nor OMNI 360 Wealth, Inc. receive any commissions for the sale of insurance directly.

Bryan P. Katz is an investment advisor with OMNI 360 Wealth, Inc.. He manages our affiliate company Princeton Financial Group Risk Management which receives commission for insurance written through that affiliate. Bryan's compensation is dependent on part by the commissions received by the company.

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Thomas Colitsas, a 11.16% owner of OMNI 360 Advisors, LLC is 100% owner of Thomas Colitsas and Associates, PC. (TCA) TCA is an accounting firm and an insurance agency. The accounting business of TCA moved over to Princeton Financial Group, LLC in 2020 to streamline our identity and branding. Thomas Colitsas does hold a life and property casualty insurance license. TCA does receive commissions on life, health and property/casualty insurance through Thomas Colitsas & Associates. The majority of revenue in TCA is for consulting on various projects not related to the business of OMNI 360 Wealth, Inc..

James G. Colitsas and Thomas Colitsas, are members of Carnegie Holdings, LLC with a number of individuals that are clients of both OMNI 360 Tax, Consulting & Accounting, LLC and OMNI 360, Inc.. Carnegie Holdings, LLC is an owner of 777 Property Management, LLC, purchased a building in 2021, and OMNI 360 Advisors, LLC and OMNI 360 Wealth, Inc. are a tenant of the property.

Neel Shah will be coming on as an advisor of OMNI 360 Wealth, Inc. effective November 1, 2023. He currently owns and manages Shah and Associates, P.C. (an estate planning law firm), Shah Total Planning, Inc and Beacon Wealth, LLC a registered investment advisor with the State of New Jersey. Beacon Wealth will be merging into OMNI 360 Wealth, Inc. effective November 1, 2023.

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

OMNI 360 Wealth, Inc. and its employees abide by the code of ethics established by the following professional organizations:

- CFP® Board of Standards
- CFA Institute
- National Association of Enrolled Agents

In general, the principals include:

Integrity  
Objectivity  
Competence  
Fairness  
Confidentiality  
Professionalism  
Diligence

A copy of the Code of Ethics is available upon request

### **Participation or Interest in Client Transactions**

OMNI 360 Wealth, Inc., and its employees may at times buy or sell securities that are also held by clients. These transactions are kept track of and are available for viewing by clients upon request. Employees may not trade their own securities ahead of client trades.

Employees may also not sell or buy from a client.

Employee trades are not significant enough to affect the securities markets.

### **Item 12 Brokerage Practices**

#### **Selecting Brokerage Firms**

OMNI 360 Wealth, Inc. as a firm does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for services. OMNI recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at a reasonable commission rate, the

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quality of client service and availability of products.

OMNI recommends discount brokerage firms and trust companies (qualified custodians) such as TD Ameritrade and Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393). OMNI does not receive fees or commissions from these arrangements, although OMNI may benefit from electronic delivery of client information, electronic trading platforms and other services provided to the custodians for the benefit of the client. OMNI may also benefit from other services provided by custodians, such as research, continuing education and practice management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions. In general, we utilize Fidelity and Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) for all discretionary clients as it allows us to provide better service to our clients than splitting the business between custodians.

Receiving research, services and/or products from brokerage firms is a conflict of interest as it could provide incentive for OMNI 360 Wealth, Inc. to recommend a broker-dealer based on its interests rather than the clients. For this reason, we do not receive commissions from brokerage firms.

OMNI 360 Wealth, Inc., reviews the execution of trades and fees charged by the custodian on an annual basis.

### **Soft Dollars**

OMNI 360 Wealth, Inc. does not receive soft dollar benefits from the custodians or brokers that we recommend to clients.

### **Direct Brokerage**

OMNI 360 Wealth, Inc. does direct brokerage for fixed income OTC investments. OMNI chooses the broker based on security, price, product availability and service.

OMNI does not recommend, request or require that a client direct us to execute transactions through a specific broker-dealer. OMNI has no affiliation or economic relationship that creates a material conflict of interest. By directing brokerage OMNI may be unable to achieve most favorable execution of the client transactions or the client may receive less favorable prices. For this reason,

we limit broker directed trades to those OTC trades where the broker has presented value by offering a security that fits well with the client that may not be readily available elsewhere at an attractive price.

To date we have never had a client request to direct brokerage, and we would discourage it if requested. OMNI would permit a client to direct brokerage; however, the client would be required to sign a disclosure that by directing the transaction to another broker, they would be subject to higher commissions and that client may receive less favorable prices.

OMNI does aggregate the purchase or sale of securities for various client accounts. When OMNI purchases or sells the same security across multiple client accounts, it will aggregate those transactions and then allocate the trade across the portfolios. This practice ensures that no one client has a benefit over another in terms of price or quantity.

### **Item 13 Review of Accounts**

Linda J. Farinola reviews all supervisory accounts on an ongoing basis. Changes in market value and conditions are monitored and investigated in a timely manner. Daily access to account value is available to OMNI 360 Wealth, Inc. and to the client upon request.

Financial plans are prepared and reviewed by Linda J. Farinola, James G. Colitsas or Bryan Katz before being presented to clients. The scope of a financial plan is agreed upon with each individual client and documented in an engagement letter. These plans generally include some or all of the following components.

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- Net Worth Statement
- Cash Flow report - current and projected
- Asset Allocation report - current and recommended.
- Retirement savings and withdrawal plan
- Tax projections and planning recommendations
- Insurance needs analysis
- Goal funding strategies and recommendations

### Regular Reports

Clients receive monthly reports showing holding, market value and activity for the period from the custodian. Other information including performance and holdings is provided in written form in accordance with the investment advisory agreement but is not less frequent than quarterly.

These regular quarterly reports include the following information

- Beginning and ending value of the portfolio for the quarter, year-to-date, inception-to-date and the components of the value change.
- Investment return for the portfolio for the period(s) and comparable market indexes and benchmarks
- Asset Allocation of the portfolio
- Value of the portfolio in relation to capital invested
- Detailed listing of the investments including cost basis

Regular reviews of financial plans are generally triggered by the client. However, significant changes in market conditions tax laws or economic can also trigger a review by the advisor.

Portfolio Management Reports for both discretionary and non-discretionary clients are created periodically with the following information that is obtained from Morningstar. These reports are generally used by OMNI internally and provided to the client only upon request or as part of basis for discussion or when recommending a change in the portfolio.

- Portfolio Composition by asset class, geography, industry, bond quality, duration
- Performance of that portfolio over past 3-10 years
- Portfolio Statistics such as Sharp Ratios, Alpha, Beta or other risk/reward data and illustrations

## **Item 14 Client Referrals and Other Compensation**

### Incoming Referrals

OMNI 360 Wealth, Inc. has received many referrals over the years, mostly from colleagues and existing clients. OMNI does not receive any economic benefit from a non-client for providing advice to clients.

OMNI 360 Wealth, Inc. may, via written arrangement, retain third parties to act as solicitors for OMNI 360 Wealth, Inc.'s investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. OMNI 360 Wealth, Inc. will ensure each solicitor is properly registered in all appropriate jurisdictions.

### Referrals to Other Professionals

OMNI does not accept referral fees in any form of remuneration from other professions when a prospect or a client is referred to them. We generally recommend clients to those professionals that proved good service, reasonable prices and a pleasant and professional working relationship.

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### Item 15 Custody

#### Account Statements

All assets are held at qualified custodians, who provide account statements directly to clients at their address of record. Occasionally, qualified clients may invest in private placements which are not held at qualified custodians. In these cases, statements are generally provided directly by the investment principal at least annually. Clients should carefully review statements provided by their custodians and should compare them to statements received from OMNI.

#### Statements Provided by OMNI 360 Wealth, Inc.

Discretionary asset management clients are provided with account statements and performance reports on a quarterly basis. Brokerage statements and OMNI statements are reconciled not less than monthly for both quantity and cost basis. On an annual basis we will also provide net worth statements and tax reports as requested.

#### Custody

OMNI 360 Wealth, Inc. does not hold any client funds or investments in its name.

OMNI does charge its fees directly to client accounts on a quarterly basis. Internally managed accounts are charged in arrears and clients are provided a calculation of those fees at least 14 days before the fees are deducted. Accounts managed by Buckingham Strategic Partners are billed quarterly in advance.

OMNI does have the ability to move money from the advisory accounts to a like titled account at another institution if the client has the appropriate signed forms on file with us and the custodian, TD Ameritrade and Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393). OMNI also has the ability to move money from a joint account to one of the individual accounts, provided both parties sign the appropriate forms. OMNI does maintain the ability to move funds to an outside party that is not named on the account only with appropriate client paperwork.

OMNI confirms all move money requests verbally with the client.

The SEC has indicated that this is interpreted having the ability to move funds to or from an individual account to or from a joint account as having custody of client funds. We work diligently with TD Ameritrade and Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) to accomplish the following 7 steps for each such arrangement.

OMNI may also be deemed to have custody over the funds and securities of trust accounts for which it or its related persons serve as trustee.

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the RIA, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The RIA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. The RIA maintains records showing that the third party is not a related party of the RIA or located at the same address as the RIA.

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7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Item 16 Investment Discretion**

#### **Investment Discretion**

OMNI 360 Wealth, Inc.. accepts discretionary authority to manage securities accounts on behalf of clients under an Asset Management agreement. Trading is done within the framework of investment guidelines that are reviewed with and approved by the client.

#### **Limited Power of Attorney**

Clients must sign a limited power of attorney before OMNI 360 Wealth, Inc. is given discretionary authority to trade or charge fees. Limited power of attorney is included in the qualified custodian's account application.

### **Item 17 Voting Client Securities**

OMNI 360 Wealth, Inc. does not vote client proxies for mutual funds, stocks, ETFs or any other securities. OMNI receives informational copies.

Clients will receive their proxies or other solicitations directly from the custodian or transfer agent. Clients may contact OMNI via phone or E-mail with questions about a particular solicitation.

### **Item 18 Financial Information**

#### **Financial Condition**

OMNI 360 Wealth, Inc. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because OMNI 360 Wealth, Inc. does not serve as a custodian for client funds or securities and does not require a prepayment fee of more than \$500per client, six months or more in advance. We do maintain more than the minimum capital required by the State of New Jersey.

OMNI 360 Wealth, Inc. has not been the subject of a bankruptcy petition at any time.

**OMNI 360 Wealth, Inc.**

**Form ADV Part 2B  
Brochure Supplement**

**Bryan P. Katz, CFP (r), CLU, ChFC, CASL, RICP**

777 Scudder Mills Rd, Bldg 4, Ste 101  
Plainsboro, NJ 08540  
Phone: 609-452-0889

Date: 09/07/2023

**This brochure supplement provides information about Bryan P. Katz, CFP®, CLU, ChFC, CASL, RICP that supplements the OMNI 360 Wealth, Inc. brochure. You should have received a copy of that brochure. Please contact Linda Farinola if you did not receive OMNI 360 Wealth, Inc.'s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Bryan P. Katz, CFP®, CLU, ChFC, CASL, RICP is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### Item 2 Educational Background and Business Experience

1997 - BS in Business Administration with finance concentration - University of Delaware

1999 - Series 7 - General Securities Representative Examination

1999 - Series 63 - Uniform Securities Agent State Law Examination

2013 - Series 66 - Uniform Combined State Law Examination

2013 - CLU - Chartered Life Underwriter Designation

2014 - ChFC - Chartered Financial Consultant Designation

2015 - CASL - Chartered Advisory in Senior Living

2016 - RICP - Retirement Income Certified Professional

2016 - CFP(R) - Certified Financial Planner (TM)

Life & Health Insurance License - NJ, NY, PA

### Work Experience

1999-2003 - SG Cowen Securities Corp., NY, NY

2003-2011 - Caris & Company, Inc., NY, NY

2011-2012 - First Analysis Securities Cor, NY, NY

2013-2018 - Northwestern Mutual, Princeton, NJ

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical



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and practice standards for CFP® professionals.

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

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours of ethics.

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

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

### **Chartered Financial Consultant ®**

A Chartered Financial Consultant is a professional designation representing the completion of a comprehensive course consisting of financial education, examinations and practical experience. Chartered Financial Consultant designations are granted by the American College upon completion of seven required courses and two elective courses. Those who earn the designation are understood to be knowledgeable in financial matters and to have the ability to provide sound advice

### **Chartered Advisor for Senior Living ®**

Chartered Advisor for Senior Living (CASL) is a professional designation for individuals whose advice helps older clients achieve financial security. A CASL certification is often held by [financial advisors](#) who have demonstrated a commitment to helping clients who are middle aged and older to achieve and preserve financial security through [wealth management](#), wealth preservation and wealth transfer planning. The CASL designation, while still recognized by the [American College of Financial Services](#) (the CASL issuing organization), is no longer offered to new students

### **Chartered Life Underwriter ®**

The premier designation for insurance professionals. Launched in 1927, the Chartered Life Underwriter (CLU®) is the insurance profession's oldest standard of excellence. Today, it continues to be the credential for practitioners who desire to provide their clients with the security of life insurance and risk management. Since its inception, tens of thousands of financial services professionals have obtained this prestigious designation. With particular emphasis placed on ethics and commitment to clients, the CLU® has earned a distinguished reputation backed by security and stewardship.

### **Retirement Income Certified Professional ®**

RICP® prepares you to help clients obtain a secure retirement. This designation equips advisors with the knowledge to effectively manage the transition from asset accumulation during a client's working years to asset decumulation in retirement. RICP® enables the advisor to demonstrate tremendous value by delivering smart strategies for creating secure, sustainable income for a client's retirement.

### **Item 3 Disciplinary Information**

Bryan P. Katz has had no disciplinary action by any professional body or legal jurisdiction

### **Item 4 Other Business Activities**

Bryan P. Katz holds a life and health insurance license in NJ, NY and PA. Bryan manages Princeton Financial Group Risk Management, LLC and acts as an agent for the company.

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### **Item 5 Additional Compensation**

OMNI 360 Risk Management, LLC receives commissions and Bryan's compensation is determined in part by those commissions.

### **Item 6 Supervision**

As it relates to the investment advisory business of OMNI 360 Wealth, Inc., Bryan is supervised by Linda J. Farinola. 609-275-9009.

**OMNI 360 Wealth, Inc.**

**Form ADV Part 2B  
Brochure Supplement**

**James Colitsas, CPA**

777 Scudder Mills Rd, Bldg 4, Ste 101  
Plainsboro, NJ 08540  
Phone: 609-452-0889

Date: 09/07/2023

**This brochure supplement provides information about James Colitsas, CPA that supplements the OMNI 360 Wealth, Inc. brochure. You should have received a copy of that brochure. Please contact Linda Farinola if you did not receive OMNI 360 Wealth, Inc.'s brochure or if you have any questions about the contents of this supplement.**

**Additional information about James Colitsas, CPA is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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### Item 2 Educational Background and Business Experience

James Colitsas, CPA

Born 1972

#### Work Experience

2013 - Present	OMNI 360 Wealth, Inc. Plainsboro, NJ Investment Advisor Representative
2013 - Present	OMNI 360 Advisors, LLC formerly Princeton Financial Group, LLC Managing Member
1999 - 2019	Thomas Colitsas and Associates, Certified Public Accountants - Manager and Accountant
2012 - 2014	Coastal Equities - Financial Advisor
2010 - 2012	Colitsas Financial Services, PC - Owner
2005 - 2012	Raymond James Financial Services, Inc. Financial Advisor
2003 - 2005	North Coast Securities, Corp - Registered Representative
2001 - 2004	Registered Representative Financial Advisor 2000 - 2001 First Allied - Princeton, NJ  Terra Securities Corp - Registered Representative 1997 -
1999	Ernst and Young, New York, NY Staff Accountant

#### Education

1992-1997	Rutgers University, New Brunswick, NJ MBA and BA in Accounting
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#### Professional Designations

Certified Public Accountant NASD  
Series 7  
NASD Series 65  
NJ Life and Health Insurance License

### Item 3 Disciplinary Information

James G. Colitsas has had no disciplinary action by any professional body or legal jurisdiction

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### **Item 4 Other Business Activities**

James G. Colitsas is majority owner and managing member of the Princeton Financial Group, LLC. James is also the manager of Princeton Financial Group Accounting, LLC. James spends approximately 70% of his time in the accounting business.

James G. Colitsas is a members of Carnegie Holdings, LLC with a number of individuals that are clients of both Princeton Financial Group, LLC (the CPA firm) and OMNI 360 Wealth, Inc.. Carnegie Holdings, LLC is an owner of 777 Property Management, LLC, purchased a building in 2021, and Princeton Financial Group and OMNI 360 Wealth, Inc. will be a primary tenant of the property.

### **Item 5 Additional Compensation**

James G. Colitsas receives a regular draw from Princeton Financial Group, LLC. The amount of that draw is tied to the profitability of the related businesses.

### **Item 6 Supervision**

As it relates to the investment advisory business of OMNI 360 Wealth, Inc., James is supervised by Linda J. Farinola. 609-275-9009.

**OMNI 360 Wealth, Inc.**

**Form ADV Part 2B  
Brochure Supplement**

Linda Farinola, CFA, CFP®, EA

777 Scudder Mills Rd, Bldg 4, Ste 101  
Plainsboro, NJ 08540  
Phone: 609-452-0889

Date: 09/07/2023

**This brochure supplement provides information about Linda Farinola, CFA, CFP®, EA that supplements the OMNI 360 Wealth, Inc. brochure. You should have received a copy of that brochure. Please contact Linda Farinola if you did not receive OMNI 360 Wealth, Inc.'s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Linda Farinola, CFA, CFP®, EA is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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### **Item 2 Educational Background and Business Experience**

Linda J. Farinola, CFA, CFP(r), EA  
President

777 Scudder Mills Rd, Bldg 4, Ste 101  
Plainsboro, NJ 08540  
lindaf@PFG-planning.com  
609-275-9009

born 1960

### **Work Experience**

1997 - Current - OMNI 360 Wealth, Inc. formerly Sound Financial Solutions, Inc. dba PFG – Financial Planning & Management

President/Financial Planner/ Investment Advisor

2013 - Current - OMNI 360 Advisors, LLC formerly Princeton Financial Group, LLC.

Partner

OMNI 360 Advisors, LLC is largely a non operating entity Its purpose is to streamline marketing and expense efforts

2010 - 2018 - Thomas Colitsas & Associates, PA

2019 - Pres - OMNI 360 Tax, Consulting & Accounting

Accountant / Tax Preparer/Tax Planner

1984-1997 - Scor Reinsurance Company

Treasurer and Chief Investment Officer

Investment Portfolio manager for \$1billion investment portfolio

Managed Commercial Paper issuance and Cash Management Operations Trustee of Employee Pension Plans

Participated in IPO preparations and convertible bond offerings Managed banking relationships for U.S. companies

### **Educational and Professional Background**

2012 - NJ Life Insurance License 1999

- NASD Series 66 Exam

1997 - Enrolled Agent - Internal Revenue Service

1995 - Certified Financial Planner (TM) - CFP Board of Standards

1993 - Chartered Financial Analyst - Association of Management & Research

1988 - MBA - Rutgers University - Finance

1981 - Bachelor of Science - Penn State University - Accounting

Sound Financial Solutions, Inc.

### **Education and Business Standards**

OMNI 360 Wealth, Inc. requires that any employee whose function involves determining or giving investment advice to clients must be a graduate of a four year college and must:

1. Have at least three years' experience in insurance, investments, accounting or financial planning.

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2. Hold a Series 65 Investment Advisor Representative license or its equivalent.
3. Be an attorney, or hold or be pursuing one of the following designations: Certified Financial Planner (tm), Certified Public Accountant (CPA), Chartered financial Analyst (CFA) or Chartered Financial Consultant (ChFC)
4. Subscribe to the Code of Ethics of the CFO (tm) Board of Standards
5. Be properly licensed for all advisory activities in which they are engaged.

### Professional Certifications

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Ethics

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

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

CFA Institute Financial Adviser Statement for SEC Form ADV

*The Chartered Financial Analyst (CFA) charter* is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter,



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candidates must:

- 1) pass three sequential, six-hour examinations;
- 2) have at least four years of qualified professional investment experience;
- 3) join CFA Institute as members; and
- 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **An enrolled agent (EA) is a federally licensed tax practitioner who has proven technical expertise in the field of taxation.**

Enrolled agents are empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service (IRS) for audits, collections, and appeals. Only EAs, attorneys, and certified public accountants (CPAs) may represent taxpayers before IRS.

Enrolled agents advise, represent, and prepare tax returns for individuals, partnerships, corporations, estates, trusts, and any entities with tax-reporting requirements. The expertise of EAs in the continuously changing field of taxation enables them to effectively represent taxpayers audited by the IRS.

The IRS Restructuring and Reform Act of 1998 allow federally authorized practitioners (those bound by U.S. Department of the Treasury Circular 230 regulations) a limited client privilege. This privilege allows confidentiality between the

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taxpayer and the enrolled agent under certain conditions. The

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privilege applies to situations in which the taxpayer is being represented in cases involving audits and collection matters. It is not applicable to the preparation and filing of a tax return.

This privilege does not apply to state tax matters, although a number of states have an accountant-client privilege.

In addition to the stringent testing and application process, the IRS requires enrolled agents to complete 72 hours of continuing professional education, reported every three years, to maintain their EA status. NAEA members are obligated to complete 90 hours per three-year reporting period.

Because of the knowledge necessary to become an EA and the requirements to maintain the license, there are only about 40,000 practicing EAs.

Only EAs are required to demonstrate to the IRS their competence in matters of taxation before they may represent a taxpayer before the IRS. Unlike attorneys and CPAs, who may or may not choose to specialize in taxes, all EAs specialize in taxation. EAs are the only taxpayer representatives who receive their taxpayer representatives who receive their right to practice from the U.S. government (CPAs and attorneys are licensed by the states).

Enrolled agents are required to abide by the provisions of U.S. Department of the Treasury Circular 230, which provides the regulations governing the practice of EAs before the IRS. National Association of Enrolled Agents (NAEA) members also are bound by the NAEA Code of Ethics and Rules of Professional Conduct.

### **Item 3 Disciplinary Information**

None

### **Item 4 Other Business Activities**

Linda J. Farinola does perform some financial consulting, tax planning and treasury management services through OMNI 360 Wealth, Inc. for which it receives a fixed or hourly fee.

Linda J. Farinola also performs tax preparation, planning and review for OMNI 360 Accounting arm. Time spent on these tasks is approximately 10% or 5-6 hours per week.

### **Item 5 Additional Compensation**

Linda J. Farinola receives a regular draw from OMNI 360 Advisors, LLC. This draw is based on the profitability of the related business with an emphasis on OMNI 360 Wealth, Inc.. Linda receives no other compensation.

### **Item 6 Supervision**

Linda J. Farinola is the president of the firm and is not supervised. However, she does review investment policies and administrative aspects of the firm with James Colitsas. In addition, our internal control procedures require review and documentation of work.