Item 1. Introduction

Atlantic Wealth Partners, LLC ("AWP," "firm," "we," "us," and "our") is an investment advisor registered with the United States Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important that you understand the differences. Please note that free and simple tools are available to research advisory and brokerage firms and their associated financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We offer introductory financial consultation services ("IFC"), personal financial and retirement management services ("PWM"), personal chief financial officer services ("PCFO"), financial planning and consulting services, and pension consulting services.

In an IFC engagement, we will evaluate your unique financial circumstances and share with you our initial impressions and a preliminary financial recommendations and investment plan. We will provide an overview of our advisory services, answer your questions related to our services and initial recommendations, and explore the possibility of a further engagement. At your request, we will provide one-time recommendations for a customized investment portfolio. Unless we are engaged for further services, you are responsible for all investment decisions, implementation, and monitoring of your investments.

In a PWM engagement, we provide you with portfolio management and organic financial planning services. We will review your financial circumstances, design, monitor, and manage your investment accounts on an ongoing basis. We will directly invest the assets deposited to your account and/or strategically allocate your assets to certain independent third party asset managers ("TPAMs") that have been vetted by our firm. You will typically be required to grant us discretionary authority to buy and sell investments in your account without obtaining your consent prior to each transaction. We may also agree to non-discretionary relationship (*i.e.*, where we must obtain your consent prior to each transaction). We generally do not allow you to impose restrictions on the investments to be bought and sold for your account. We will review your investment accounts at least bi-annually and provide you with written "summary recommendations" concerning your financial planning matters (*e.g.*, retirement/estate planning, tax and education planning, budgeting/cash management). We will update these recommendations annually. You are responsible for all investment decisions, implementation, and monitoring of assets held outside the investment accounts under our discretionary management.

PCFO engagements are our most comprehensive offering, combining ongoing discretionary portfolio management services, comprehensive financial planning services, and the coordination of virtually all of your wealth management activities with your trusted third party legal, tax, insurance, and other advisors. This service includes, without limitation, legal and tax strategy coordination, tax minimization planning, wealth transfer design, charitable plan design, asset protection and exposure monitoring, insurance policy management, asset allocation/investment plan design, leverage/credit management, and direct investment analysis services.

Our financial planning and consulting services are tailored to assist you in the management of your financial affairs. We will review your financial situation and assets, risk profile, investment time horizon, and investment goals and provide you with a written summary of our recommendations. No review or update of our summary recommendations is typically provided. Except were we are engaged for account monitoring services, you are responsible to monitor your investments. Our pension consulting services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, and/or education services to plan participants. Clients of these services maintain the sole discretion to make all final investment decisions.

We advise our clients regarding investments stocks, bonds, mutual funds, exchange traded funds ("ETFs"), limited partnerships (such as hedge funds or private equity), TPAM separately managed accounts, variable and indexed annuities, life insurance (including private placement life insurance), and direct investments in real estate, oil, gas, or other privately held businesses, among other investment types. PWM accounts are subject to a minimum annual fee of $2,500. PCFO accounts are subject to a minimum annual fee of $60,000. Financial planning accounts are subject to a minimum fee of $1,500.

More detailed information about our advisory services and account minimums is contained in our Form ADV Part 2A "firm brochure" at Items 4 and 7.

Conversation Starter: Ask us:

- *(i) Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *(ii) How will you choose investments to recommend to me?*
- *(iii) What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

In certain situations clients can pay a one-time $500 fee for initial financial consultation services. Depending on the circumstances, this fee may be waived. PWM clients typically pay annual asset-based management fees calculated as a percentage of the value of their investment account (ranging from 0.50% - 1.50% per year). Asset-based fees are charged quarterly, in advance, based on the time-weighted daily average value of the client's account at the end of the previous quarter. PWM accounts where assets are held away from our firm typically pay annual fixed fees ranging from $2,500 - $25,000, as determined based on their total assets under our advisement ("AUA"). These fess are paid monthly or quarterly, in advance, and never exceed 1.50% of the value of the client's AUA. PCFO clients pay a combination of annual fixed fees (ranging from $60,000 to $750,000 per year), asset-based fees (ranging from 0.25 – 0.35% per year), and/or performance-based fees ranging from 10.00 – 20.00% of new net profits experienced in the client's designated investment accounts). Fixed fees for these services are billed quarterly in advance. Asset-based fees for these services are billed semi-annually in advance. Performance-based fees for these services are billed annually in arrears. All fees for these services are pro-rated for partial periods.

Our advisory fees do not include brokerage commissions and transaction costs, custodial charges, taxes, wire transfer fees or any other similar fees or expenses associated with activity in your

investment accounts, which you will separately pay. Our advisory fees also do not include any internal management fees or other fees or costs associated with your participation in any mutual funds, ETFs, variable products (life insurance and annuities), alternative investments, or costs associated with your independent engagement of any TPAMs, legal or tax advisors.

You should consider that the more assets you have in your portfolio management account the more you will pay us, thus creating an incentive for us to encourage you to increase and/or maintain the level of assets in your account. On the same basis, this also incentives us to maximize your returns, and minimize your downside risk, relative to your stated risk tolerance. You pay our advisory fee regardless of the level of activity in your account within any billing period.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More detailed information about our advisory fees is contained in our Form ADV Part 2A "firm brochure" at Item 5.

Conversation Starter: Ask us: *"Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"*

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

Example 1: The value of your asset-based advisory fee account goes up, and while the annual percentage we charge may stay the same, the total compensation you pay us goes up proportionately.

Example 2: Your account value goes down, but you still must pay us an asset-based fee advisory fee proportional to your assets under management.

Representatives of our firm are individually licensed to sell insurance, may sell insurance products to clients, and may receive commissions in connection with such transactions. AWP is also affiliated with Prudent Insurance, LLC, a licensed general insurance agency which may also receive compensation as a result of sales of insurance products to clients. Certain representatives of our firm are individually licensed real estate brokers and may receive customary fees and commissions associated with real estate transactions conducted on the behalf of advisory clients. We are also affiliated with Stephen T. Olson, Inc. a licensed real estate brokerage firm which may also receive compensation as a result of real estate transactions with clients. We are also affiliated with AWP Tax Planning, LLC, a tax planning and preparation firm which may also receive compensation as a result of referrals of our advisory clients. AWP may recommend that clients purchase interests of certain privately offered pooled investment vehicles ("Affiliated Funds") that are sponsored, managed, and advised by AWP and/or its affiliates, some or all of whom may share personnel. When clients elect to purchase interests in our Affiliated Funds, certain of AWP's personnel and affiliates will benefit and receive additional compensation indirectly as a result of such transactions.

Advisory fees paid to AWP are separate and distinct from any commissions or other compensation which may be received by representatives of our firm or our affiliates. Our advisory fees will not be reduced by the amount of any commissions or other compensation received by any of our affiliates. The foregoing arrangements create conflicts of interest with clients. As fiduciaries, we will only transact business, recommend insurance products, or recommend investments in the Affiliated Funds or the services offered by our affiliates when fully disclosed, suitable, and appropriate for the client. You are never obligated to use any of our representatives or affiliates for any of the foregoing products or services and you are never obligated to invest in the Affiliated Funds.

More detailed information related to these conflicts of interest is contained in our Form ADV Part 2A "firm brochure" at Items 5 and 10.

Conversation Starter: Ask us: *How might your conflicts of interest affect me, and how will you address them?"*

How do your financial professionals make money?

Our financial professionals are compensated with annual salaries and/or discretionary bonuses. Additional compensation may be received as described above.

More detailed information about our conflicts of interest is contained in our Form ADV Part 2A "firm brochure" at Items 5 and 10.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. We encourage you to visit Investor.gov/CRS for a free and simple search tool to research any of our financial professionals.

Conversation Starter: Ask us: *"As a financial professional, do you have any disciplinary history? For what type of conduct?"*

Item 5. Additional Information

Additional information regarding our firm, including our firm brochure and this Client Relationship Summary can be obtained by visiting https://adviserinfo.sec.gov/firm/summary/289440, our firm website at www.atlanticwp.com, or by contacting us by telephone at 561-632-0566. We are always available to answer any of your questions.

Conversation Starter: Ask us: *"Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"*

SUMMARY OF MATERIAL CHANGES

This Client Relationship Summary reflects the following material changes from the initial version dated June 15, 2020:

- Item 2, under the heading, "What investment services and advice can you provide me?," has been amended to reflect that personal chief financial officer services ("PCFO") accounts are now subject to a minimum annual fee of $60,000. In the prior version of this Client Relationship Summary the minimum annual fee for PCFO accounts was stated as $40,000.

- Item 3, under the heading, "What fees will I pay?," has been amended to reflect that, in addition to fixed fees, PCFO accounts now may be made subject to asset-based and/or performance-based fees. In the prior version of this Client Relationship Summary, PCFO accounts were subject only to annual fixed fees determined based upon the client's assets under advisement.

- Item 3, under the heading, "How else does your firm make money and what conflicts of interest do you have?," has been amended to disclose that:

    - AWP is affiliated with Stephen T. Olson, Inc., a licensed real estate brokerage firm which may receive customary fees and commissions as a result of investment real estate transactions conducted on the behalf of advisory clients. Referrals of advisory clients to Stephen T. Olson, Inc. may create a conflict of interest, which the firm attempts to mitigate by acting in the best interest of our clients

    - AWP is affiliated with AWP Tax Planning, LLC, a tax planning and preparation firm which may receive customary fees as a result of providing tax services to advisory clients. Referrals of advisory clients to AWP Tax Planning, LLC may create a conflict of interest, which the firm attempts to mitigate by acting in the best interest of our clients.

    - AWP may recommend that clients purchase interests of certain privately offered pooled investment vehicles ("Affiliated Funds") that are sponsored, managed, and advised by AWP and/or its affiliates, some or all of whom may share personnel. When clients elect to purchase interests in our Affiliated Funds, certain of AWP's personnel and affiliates will benefit and receive additional compensation indirectly as a result of such transactions. Our recommendation that an advisory client invest in any Affiliated Funds may create a conflict of interest, which the firm attempts to mitigate by acting in the best interest of our clients.

ATLANTIC WEALTH
PARTNERS

Item 1: Cover Page

June 17, 2021

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Jupiter, Florida 33477
Phone: 561-632-0566
atlanticwp.com

Firm Contact:

Stephen T. Olson | Founder and Managing Principal

This brochure provides information regarding qualifications and business practices of Atlantic Wealth Partners, L.L.C. ("Atlantic Wealth Partners"). If you have questions about the contents of this brochure please call us at (561) 632-0566. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov by searching for our firm by name or by its unique CRD number (CRD No. 289440).

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this firm brochure and any brochure supplements for more information on the qualifications of our firm and our associates.

ITEM 2: MATERIAL CHANGES

Open communication and transparency form the foundation of our client relationships. Atlantic Wealth Partners provides you with complete and accurate information in a timely manner. We encourage all current and prospective clients to read this brochure carefully and encourage you to discuss any questions you may have with us by contacting as at the telephone number on the cover page. Your feedback ensures that we continually improve.

We are required to notify you of all material changes to our brochure on at least an annual basis. This brochure reflects the following material changes since the filing of our last annual update to this document dated March 2, 2020.

- Item 1 – This Item now reflects that Atlantic Wealth Partners is an investment advisor registered with the SEC (effective April 1, 2020). Prior its registration with the SEC, the firm had been registered with the State of Florida Office of Financial Regulation.
- Items 4, 5, and 6 – These items have been amended to reflect the following:
    - third party money managers may be incorporated into our "Private Wealth Management" services and "Personal Chief Financial Officer" services;
    - we now offer pension consulting services to retirement plans and their sponsors;
    - our asset based fees for "Private Wealth Management" services are based on the time-weighted daily average value of your account at the end of the previous billing period;
    - changes to the range and amount of fixed fees, hourly fees, and minimum fees that we may charge in connection with our financial planning and "Personal Chief Financial Officer" services;
    - the addition of performance-based fees for certain services; and
    - changes to our termination policies for certain services;
    - disclosure related to conflicts of interest arising as a result of performance-based fees and side-by-side management of accounts.
- Items 5, 10, and 11 – These items have been amended to discuss certain conflicts of interest arising from our and our related persons' role with respect to certain privately offered real estate investment vehicles in which advisory clients may participate.
- Item 10 has been updated to reflect that we are affiliated with AWP Tax Planning, LLC by virtue of shared ownership and management personnel and to discuss the conflicts of interest which arise where we may refer advisory clients to this firm for tax planning and/or tax return preparation services.
- Item 12 – This item now contains additional disclosures concerning our brokerage practices as they relate to TD Ameritrade Institutional, one of our recommended brokers.
- Item 15 – This item now discloses that our firm may be deemed to have custody based on its maintaining standing letters of authorization and the role of its related persons in certain privately offered real estate investment vehicles in which advisory clients may participate.

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ITEM 4: ADVISORY BUSINESS

Our Firm

Atlantic Wealth Partners is an SEC registered investment advisor established in 2017 as a limited liability company formed under the laws of the State of Florida. Stephen T. Olson is the founder and sole Managing Principal of our firm. Our principal office is located in Jupiter, Florida.

The information contained below describes our investment advisory services, practices, and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our services to the needs of our clients. As used throughout this firm brochure, the words "we," "our," "firm," "AWP" and "us" refer to Atlantic Wealth Partners, and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Our firm exists to provide individuals and families with customized, comprehensive wealth management, financial planning, and investment advisory services to meet their goals while remaining sensitive to their emotional and financial tolerance to risk, and the time horizon for their investments and financial objectives.

As your fiduciary, it is our legal and moral duty to always act in your best interests. This is accomplished by understanding the details and challenges of our clients' financial lives. Together, we:

a) Identify areas of financial, legal and tax exposure in order to establish and set clear financial objectives; and
b) Collaborate and coordinate with your tax and legal advisors to establish clear, written, and unbiased recommendations.

AWP works with you to implement our investment recommendations and to monitor progress towards your financial goals and objectives.

Except for engagements for introductory financial consultation services, each client receives customized financial recommendations and an investment management plan (encompassing managed, held-away, and private holdings) geared towards their financial goals and objectives. We build these recommendations around life milestones and needs, including retirement, wealth transfer, business succession planning, charitable planning, income protection and asset protection goals, with a focus on five main areas:

1. Minimizing taxes (income and estate);
2. Identifying acceptable levels of risk and counseling to realize risk-adjusted returns in your securities portfolio and held away assets (real estate, privately held businesses, deferred compensation plans, etc.);
3. Managing liquidity needs and maximizing cash flow;
4. Creating sustainable retirement income; and
5. Minimizing the burden of probate and death taxes on your heirs.

Every investment management plan is based on the client's unique investment strategy, personal situation, and willingness, ability and suitability to accept market risk. Plans are formalized with a written Investment Policy Statement or similar document to ensure consistent adherence to your financial goals. We pride ourselves on being a service-oriented practice with open lines of communication. Working with clients to understand their objectives while educating them about our process facilitates the partnerships we value and our clients deserve.

Types of Services Offered

- Introductory Financial Consultation Services

We offer prospective clients an introductory financial consultation to discuss the nature of our services and the client's financial status and objectives to offer our initial investment plan and/or to determine the possibility of a further potential advisory relationship.

During an introductory financial consultation, we will typically interview you to learn the details of your investment experience and financial objectives, risk tolerance, and time horizon for investments. We will review your current financial circumstances, including the nature, amount, and location of your assets (including but not limited to any checking, savings, IRA, 401(k), brokerage accounts, life insurance, and real estate holdings) and liabilities, current life insurance policies and benefits, and your current and expected income level. We will provide an initial evaluation of your current investments and asset allocation mix; discuss wills, trusts, estate planning, and insurance matters with you; provide basic information regarding our investment processes and strategies, investment risks, and common investment types we may recommend (e.g., mutual funds, exchange traded funds ["ETFs"], stocks, bonds, and certificates of deposit ["CDs"], among others); and share with you our initial impressions and preliminary recommended investment plan. We will also answer any questions you have related to your assets or our services at this time. If necessary, we will typically schedule a follow-up consultation to determine whether you would like to engage us for further advisory services. There is no obligation to engage our firm for further services and the decision as to whether to implement any of our preliminary investment recommendations is entirely left to your discretion.

- Private Wealth Management ("PWM") Services

Our PWM services deliver thoughtful, robust, ongoing traditional portfolio/asset management and organic financial planning services to our clients. Our long-term relationship with you under this program is strengthened by regular information share meetings focused on goal-driven strategy and execution.

During the initial and early stage information share meetings we seek to review, evaluate and understand the entirety of your financial situation, existing resources, goals and your tolerances for risk. We will then develop, document, and share our immediate considerations to further your stated goals.

Based on our dialogue and the supporting information, we will then develop and present you with a detailed, individualized investment portfolio typically encompassing low-cost mutual funds and ETFs, fixed income instruments (including, without limitation, treasuries, money market funds, corporate bonds, asset-backed securities, municipal bonds and international bonds) individual equity securities (i.e., stocks), and/or other public and private securities or investments. We may also advise on any legacy assets already held by you at the onset of our relationship, as you request. As described in further detail below, our PWM services may further incorporate the use of certain independent third-party money managers, sub-advisers, and/or private investment managers for management of all or a portion of your assets.

Following implementation of your initial investment portfolio, we will monitor the performance of your account on an ongoing basis and implement changes as needed or appropriate, in consideration of current economic conditions, our market opinions and assumptions, and your individual financial circumstances, all in pursuit of your ultimate investment goals. We will also provide you with detailed status updates and reporting regarding your account at least quarterly. It is your ongoing responsibility to advise us in writing of any material changes to your financial circumstances.

In addition to ongoing management of your investment portfolio, we will also provide you with financial planning services that may encompass a variety of topics such as retirement and estate planning, investment planning, education planning, tax planning, debt/credit analysis, charitable giving, and other areas, as may be relevant to your unique financial circumstances. These planning services will include delivery of an informal written summary or checklist of action items and recommendations addressing the selected financial topics ("Summary Recommendations"). Our Summary Recommendations will be updated annually, or otherwise, at your reasonable request. Frequent requests for updates of our Summary Recommendations may require payment of additional fees at our then applicable rates.

Recommendations of TPAMs. Where appropriate, our PWM Services may include recommendations for the allocation of some or all of your assets to certain independent third party money managers, sub-advisers, and/or private investment managers (collectively, "TPAMs"). The TPAMs we may recommend under this service may be accessible to us via the investment platform of your independent qualified custodian. In other instances, we may recommend that the client directly engage a TPAM whose services are made available outside of any custodial investment platform. In each case, you may be required to enter into a separate advisory agreement and/or to execute a trading authorization empowering the selected TPAM(s) to trade your account on a discretionary basis.

We may utilize an "Overlay Management Feature" that creates a custom asset allocation model for your account, including the use of TPAMs. Through the overlay feature, we will recommend allocations of your assets to preferred TPAMs, who will in-turn implement trade orders, invest and reinvest your assets in the strategy designated by our firm on a discretionary basis, and perform any necessary periodic rebalancing of your account. Prior to referring clients to TPAMs, our firm conducts reasonable due diligence to determine that they are appropriately licensed to conduct business with applicable regulatory authorities.

Our TPAM search, selection, evaluation, and monitoring services assist our clients in the identification of independent third-party managers that are consistent with the asset allocation plan determined for each client. Key factors we consider when evaluating TPAMs are their investment process, investment philosophy, risk management, historical performance, investment strategy and style, fees and operating expenses, fund size, and tax-efficiencies. In evaluating investment managers, we may also incorporate both qualitative and quantitative fundamental analysis to validate and confirm a manager's investment style and skill, as well as compare them to other managers of similar style. We may utilize various research databases, proprietary models, financial periodicals, prospectuses and filings with the SEC, industry contacts and manager data, among other items, as part of the research process.

We will monitor your TPAM accounts on an ongoing basis to ensure the selected TPAMs is/are performing as expected and that your overall mix of TPAM investments remains well suited to your investment profile. If we believe that any TPAM is no longer suitable for you, or that a different manager is more suitable for your needs, then we will contract and/or recommend that you contract with a different TPAM and/or reallocate your assets among existing TPAMs accordingly.

Irrespective of the use of any TPAMs, our firm maintains responsibility for the ongoing professional relationship, including the initial and ongoing suitability determination. We are not an agent of any TPAM. We retain the authority and responsibility to provide customized investment advice and strategic services to you. Clients are provided with a copy of each TPAM's Form ADV Part 2 (or equivalent disclosure information) prior to entering into any TPAM engagements.

Investment Discretion. As a PWM Services client, you will typically be required to grant our firm discretionary authority over your accounts held at the qualified custodian. In doing do, you empower AWP to (i) select the securities to buy and sell; (ii) the amount of securities to buy and sell; (iii) determine when to buy and sell securities; and (iv) take all other actions necessary or incidental to the execution of such transactions; all for your account and risk and without obtaining specific consent from you for each transaction. At your option, our discretionary authority may be expanded to include the ability to engage and terminate TPAMs (including negotiating fees to be paid to such TPAMs) on your behalf. You will provide this authorization to us in our written advisory agreement and/or in the account opening agreement with the qualified custodian of your assets. In limited circumstances and in our sole discretion, we may agree to manage your PWM account on a non-discretionary basis.

Implementation decisions regarding any of our Summary Recommendations for assets held away from the accounts we manage directly are at the exclusive discretion of the Client and may be completed by our firm, at your option, subject to the payment of applicable advisory fees. You are under no obligation to use our firm to implement any of our Summary Recommendations for assets held away.

- Financial Planning (Planning, Consulting, and Analysis) Services

We offer stand-alone Financial Planning services that typically encompass preparation of dynamic, easily understood and actionable recommendations, based on a thorough evaluation of your personal financial situation and objectives. The customized action plan specifies strategic measures for your immediate implementation and execution into your existing financial planning activities.

Our Financial Planning services may encompass some or all of the following topics:

- Investment planning
- Retirement planning
- Estate planning
- Charitable planning
- Education planning
- Corporate and Personal tax planning
- Cost segregation studies
- Corporate structure
- Real estate analysis
- Mortgage/Debt analysis
- Insurance analysis
- Credit evaluation
- Third Party Asset Manager Selection
- Ongoing Asset Monitoring

With the exception of ongoing asset monitoring services, assuming prompt provision of all information from the client, our financial planning services are typically completed within 30-60 days of our engagement. Unless specifically requested by the client and agreed in writing, our performance of these services is not typically accompanied by delivery of a formal written financial plan, but instead may take the form of an informal written summary or checklist of action items and recommendations provided to the client. Our final set of recommendations will only be updated upon your specific request and upon re-engagement of our firm for such update(s) and the payment of a new advisory fee. Implementation of our recommendations will be at the exclusive discretion of the client and may be completed by our firm, at your option, for an additional cost. You are under no obligation to use our firm to implement any recommendations provided.

Our asset monitoring services include ongoing monitoring of investment accounts selected by the client. We will monitor your accounts based on your stated investment objectives, financial circumstances, and risk tolerance and alert you if your portfolio becomes over-weighted or if the current economic climate shifts the expected targets of your portfolio.

In providing these services, you are advised that AWP is not a law firm or insurance agency, nor are we acting as accountants or tax advisors. Accordingly, no portion of our investment advice should be construed as legal or tax advice. Clients may elect to engage any recommended third-party professionals at their own discretion and risk.

- Personal CFO (Chief Financial Officer) Services

For a select group, we manage, monitor, and coordinate the ongoing execution and integration of all wealth management activities - including legal, accounting and tax needs, discretionary portfolio management, and, where appropriate, the selection and monitoring of TPAMs, all while acting in the capacity of your "Personal Chief Financial Officer." This comprehensive, full-service Personal CFO approach includes the following advisory services, as customized to the client's needs:

- Document management
- Legal & tax strategy interpretation & coordination
- Income & estate tax minimization planning
- Income plan management
- Retirement plan design
- Wealth transfer plan design
- Charitable plan design
- Asset protection strategy implementation & exposure monitoring
- Beneficiary education
- Investment policy development
- Asset allocation development
    - Investment vehicle selection
    - Investment manager (TPAM) selection & due diligence
    - Investment oversight & performance monitoring
    - Investment management fee negotiation
- Insurance policy management
    - Active policy management
    - Solvency studies
- Direct investment analysis (real estate, business, acquisitions, etc.)
- Leverage management – financing negotiation

As part of the Personal CFO data gathering process, we will ask that you to provide us with all your financial documents and statements. We will request input and information from you, including historical financial information, present financial condition and account information, and your investment history and experience. The information we request may vary, depending upon the individual needs and objectives that you express to us or that we may discover in our interviews with you. We will also request the names and relationships of other trusted advisors (i.e., attorneys, accountants, bankers, etc.).

Compiling all your financial documents and statements is merely the first step in our Personal CFO discovery process. This second step is uniquely designed to help you identify your values, goals and priorities, and how they relate to your finances. This discovery session focuses on what matters to you – your beliefs about money, your unique history with money, your values, and your goals. It helps you bring into focus an action plan for the life you want to life and the legacy you want to leave behind.

During this process, we will discuss topics such as:

- Preserving Existing Capital;
- Building More Wealth;
- Preserving Purchasing Power;
- Preserving Your Lifestyle;
- Minimizing Unnecessary Investment Risk;
- Building Family Peace;
- Educating the Next Generation; and
- Minimizing Excessive Income and Estate Taxation.

Based upon the data gathered, we will provide you with various options that represent solutions to accomplish your objectives. A series of meetings will take place where we educate you on our proposed solutions and address any questions you may have regarding the options presented. We identify the actions necessary to bring your goals into reality. The most common results from this process are recommendations for an appropriate cash flow plan, investment plan, asset protection plan, risk management structure, estate and tax plan, and overall financial plan.

We assist you in implementing all of your decisions and will coordinate them with all of your trusted advisers, as necessary. We communicate with your accountant and your attorney (if you have directed us to do so) to implement your specific plan. We execute the portfolio design that you've selected, helping you to liquidate and acquire securities and engage any TPAMs we've identified in the plan.

Recommendations of TPAMs. The PWM services portion of our Personal CFO Services may include recommendations for the allocation of some or all of your assets to certain TPAMs. The TPAMs we may recommend under this service may be accessible to us via the investment platform of the independent qualified custodian of your account. In other instances, we may recommend that the client directly engage a TPAM whose services are made available outside of any custodial investment platform. In each case, you may be required to enter into a separate advisory agreement and/or to execute a trading authorization empowering the selected TPAM(s) to trade your account on a discretionary basis.

We may utilize an "Overlay Management Feature" that creates a custom asset allocation model for your account, including the use of TPAMs. Through the overlay feature, we will recommend allocations of your assets to preferred TPAMs, who will in-turn implement trade orders, invest and reinvest your assets in the strategy designated by our firm on a discretionary basis, and perform any necessary periodic rebalancing of your account. Prior to referring clients to TPAMs, our firm conducts reasonable due diligence to determine that they are appropriately licensed to conduct business with applicable regulatory authorities.

Our TPAM search, selection, evaluation, and monitoring services assist our clients in the identification of independent third-party managers that are consistent with the asset allocation plan determined for each client. Key factors we consider when evaluating TPAMs are their investment process, investment philosophy, risk management, historical performance, investment strategy and style, fees and operating expenses, fund size, and tax-efficiencies. In evaluating investment managers, we may also incorporate both qualitative and quantitative fundamental analysis to validate and confirm a manager's investment style and skill, as well as compare them to other managers of similar style. We may utilize various research databases, proprietary models, financial periodicals, prospectuses and filings with the SEC, industry contacts and manager data, among other items, as part of the research process.

We will monitor your TPAM accounts on an ongoing basis to ensure the selected TPAMs is/are performing as expected and that your overall mix of TPAM investments remains well suited to your investment profile. If we believe that any TPAM is no longer suitable for you, or that a different manager is more suitable for your needs, then we will contract and/or recommend that you contract with a different TPAM and/or reallocate your assets among existing TPAMs accordingly.

Irrespective of the use of any TPAMs, our firm maintains responsibility for the ongoing professional relationship, including the initial and ongoing suitability determination. We are not an agent of any TPAM. We retain the authority and responsibility to provide customized investment advice and strategic services to you. Clients are provided with a copy of each TPAM's Form ADV Part 2 (or equivalent disclosure information) prior to entering into any TPAM engagements.

Recommendation of other Third-Party Professionals. As part of our Personal CFO services, we may recommend the use of certain other third-party professionals to assist you in implementing our recommendations. These third-parties may include, without limitation, attorneys, certified public accountants, insurance agents and others. You are advised that AWP is not a law firm or insurance agency, nor are we acting as accountants or tax advisors. Accordingly, no portion of our investment advice should be construed as legal or tax advice. Clients may elect to engage any recommended third-party professionals at their own discretion and risk.

Investment Discretion. As a Personal CFO client, you will be required to grant our firm discretionary authority over your accounts held at the qualified custodian. In doing so, you will empower AWP to (i) select the securities to buy and sell; (ii) the amount of securities to buy and sell; (iii) determine when to buy and sell securities; (iv) engage and disengage TPAMs (including negotiating fees to be paid to such TPAMs) and/or reallocate your assets among TPAMs; and (v) take all other actions necessary or incidental to the

execution of such transactions; all for your account and risk and without obtaining specific consent from you for each transaction. You will provide this authorization to us in our written advisory agreement and/or in the account opening agreement with the qualified custodian of your assets.

- Pension Consulting Services

We offer ongoing pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, and/or education services to plan participants regarding risk tolerance and investment choices.

NOTE: Certain plans we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 ("ERISA"). We will provide pension consulting services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. The consulting services we provide are advisory in nature. In providing services to any plan and its underlying participants, our status is that of an investment adviser registered with the SEC. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as a fiduciary of the Plan as defined in Section 3(21) under ERISA, only. In all cases, our status as a fiduciary under ERISA is clearly disclosed in a written advisory agreement. If there is any discrepancy between the disclosures in this paragraph and the agreement, the agreement shall govern.

- Tailored Advisory Services

AWP offers personalized investment advisory services developed as a hybrid of any of the foregoing service offerings that are tailored to the unique needs of your personal situation and financial reality. During the first information share meeting we will work with you to determine an appropriate mix of services based on your needs and circumstances.

The investment advice we provide is driven by each client's individual financial objectives and personal investment profile. This profile is based upon numerous factors including the client's investment objectives and goals, personal risk assessment, asset class preferences, investment horizon, liquidity needs, generational requirements, charitable desires, estate planning and tax considerations. According to these needs we develop and recommend an appropriate strategic portfolio asset allocation for the client. On a periodic basis, we may recommend tactical changes in those allocations to take advantage of an opportunity to capitalize on conditions in the current economic or market environment. Depending on a particular clients' needs and goals, we may or may not recommend a tactical change in the client's asset allocation.

To implement our recommended strategic and tactical asset allocations at the client portfolio level, our firm typically recommends particular strategies in each of the portfolio's selected asset classes. To execute these strategies, we recommend only unaffiliated investment managers, funds and other investments that employ that strategy. Examples of the kinds of investments we might recommend include, without limitation: stocks, bonds, mutual funds, ETFs, limited partnerships (such as hedge funds or private equity), TPAM managed accounts, variable annuities, life insurance (including private placement life insurance), direct investments in real estate, oil, gas, or other privately held businesses.

Clients are advised that all (or substantially all) of the investment products and TPAMs we recommend can be invested in or otherwise be accessed by the client directly, without the services of our firm; however, the client would not receive the services provided by us designed, among other things, to assist the client in determining which products and services are most appropriate to the client's financial condition and objectives.

Client Imposed Investment Restrictions. Our firm does not usually allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. This is especially difficult when the management of the client's account involves the use of TPAMs, since our firm does not directly trade the client's account. We will work with clients to make exceptions to this policy on a case-by-case basis, where we determine such exceptions and restrictions to be reasonable, in our sole discretion.

Participation in Wrap Fee Programs

We do not offer or sponsor any wrap fee programs.

Regulatory Assets Under Management

As of December 31, 2020, we managed approximately $154,374,044 of client assets on a discretionary basis and approximately $0 of client assets on a non-discretionary basis. As of the same date, we advise on approximately $30,523,438 of additional client assets and accounts.

ITEM 5: FEES & COMPENSATION

Compensation for Our Advisory Services

We receive the following advisory fees in connection with our services to clients. All client fee arrangements are set forth in written advisory agreement.

- Introductory Financial Consultation Services

Initial client consultations are typically charged a fixed fee of $500, although we may negotiate this rate on a per client basis. If the client elects to engage us for further services, the fixed fee charged will be fully or partially offset (at our discretion) against the charges the client will incur in connection with such further services. Clients that seek to have us design a stand-alone custom investment portfolio without further services from our firm will be charged an additional fee, not to exceed $2,500 in which case, there is no fee offset.

- Private Wealth Management (PWM) Services

PWM Services clients pay either an annual asset-based management fee or fixed fees in connection with our rendering of PWM services.

Asset-based Fees. Our asset-based fees are charged in accordance with the following fee schedule:

Assets Under Management	Annual Percentage of Assets Charge
First $500,000	1.50%
Next $2,000,000	1.25%
Over $2,500,000	0.50%

Annualized fees are paid quarterly, in advance, based on the time-weighted daily average value of your account at the end of the previous quarter, unless otherwise agreed upon. For accounts opened during a calendar quarter, the fees due and payable are calculated on a pro-rated basis for the balance of the quarter. Our fees are negotiable, and adjustments are made for deposits and withdrawals during the quarter.

Fixed Fees. We also offer fixed fees for PWM services on accounts that are held away from our firm, that are determined by the total value of assets (not net worth) under our advisement. We reserve the right to negotiate such fixed advisory fees based on the scope and complexity of the engagement with a maximum annual fee of up to $25,000. Our fixed fees for PWM services will never exceed 1.50% of the assets under our management. Our fixed fees will be paid by direct fee deduction (as described below) or be directly invoiced to you on a prorated basis and billed quarterly or monthly. Our fixed fee is based

on the value of assets as of the previous year and re-assessed every 12 months. We will inform the client of the annual fixed fee for the coming year in writing 60 days prior to the annual service contract renewal. Once the assets are eligible to be transferred to our firm upon retirement, your fixed-fee engagements will typically convert to the asset-based fee schedule described above.

The qualified custodian will send an account statement to you, typically monthly, but no less than quarterly, identifying the amount of funds and each security in the account at the end of the period and setting forth all transactions in the account during that period, including the amount of any advisory fees paid directly to us. You bear the responsibility for verifying the accuracy of our advisory fee calculations and we therefore encourage you to reconcile our invoices against the qualified custodian's account statements carefully and promptly upon receipt. If you believe we have miscalculated the advisory fees applied to your account or if there is any other issue with your account, you should contact us immediately at the phone number and e-mail address listed on the cover page of this brochure.

- Financial Planning (Planning, Consulting, and Analysis)

Hourly or Fixed Fees. Our firm charges on an hourly or fixed fee basis for Financial Planning Services. Total estimated fees, as well as the ultimate fee charged, are based on the scope and complexity of the engagement and the time, research, and other resources we expect to devote to complete the services. Our hourly fee rates typically range from $300 - $600 per hour and our fixed fees typically range from $1,500 to $25,000 but may exceed these ranges in certain cases. Where hourly fees apply, you will be provided with a good-faith estimate of the total expected costs of these services at the time of engagement. A retainer of 50% of the fixed fees or our good faith estimate of hourly fees is due at the time of engagement. The remainder of our fees, if any, is billed directly to the client and due within 30 days of delivery of our written recommendations to you or the completion of our consultation. Our firm does not require any prepayment of fees exceeding $1,200 when these services cannot be rendered within six months.

- Personal CFO Services

We may be compensated for our Personal CFO services by the client's payment of fixed annual fees, asset-based fees, and/or performance-based fees.

Fixed Fees. Fixed fees for these services are determined based on the total value of assets under our advisement, the scope of services desired by the client, and the complexity, time commitment, and resources expected to be devoted to administering the client's assets (including real estate, businesses, life insurance, restricted stock, partnerships, annuities, retirement plans, and other assets under advisement). Fees for this service may be negotiated on an individual client basis and may range up to $750,000 annually. All fixed fees for these services are prorated and billed quarterly in advance to the client. We will inform the client of the annual fixed fee for the upcoming year in writing 90 days prior to the annual service contract renewal.

Fixed fees are presented to clients in writing. We will provide supporting documentation of the expected scope and complexity of the engagement upon client request. Any number of accounts, business entities, trusts, investment properties, and/or private holdings will be analyzed, reviewed and monitored on an ongoing basis. As such the value of each client's assets, the extent of the use of TPAMs, the extent of associated tax implications, and the financial planning and consulting services to be provided will be among the many factors presented to support the proposed fixed fee.

Combined Asset-based Fees and Performance-based Fees. Where you meet the definition of a "qualified client" under the Investment Advisers Act of 1940, your account may be subject to a combination of annual asset-based fees and performance-based fees. These fees may be structured as either:

(i) an asset-based fee equal to 0.25% of the market value of the client's designated investment accounts managed by AWP, paid in two equal semi-annual installment payments, billed in advance, combined with a performance fee equal to twenty percent (20.00%) of all "New Net Profits" experienced within the designated investment accounts during each calendar year in excess of a six percent (6.00%) "hurdle" return, billed annually in arrears; or

(ii) an asset-based fee equal to 0.35% of the market value of the client's designated investment accounts managed by AWP, paid in two equal semi-annual installment payments, billed in advance, combined with a performance fee equal to ten percent (10.00%) of all New Net Profits experienced within the designated investment accounts, billed annually in arrears.

The specific investment accounts subject to these fees will be set forth in a written advisory agreement with the client. For purposes of calculating the performance fee, New Net Profits shall be computed using the following formula: (1) the net realized profit and loss during the calendar year, plus (2) the change in unrealized profit and loss on open positions during the calendar year, minus (a) all brokerage commissions, transaction fees, advisory fees paid to AWP, and other charges incurred during the period and (b) cumulative net loss, if any, carried over from previous periods (adjusted for any withdrawals) ("loss carryforward").

The performance fee will be calculated and paid in arrears and will be prorated for partial calendar years. If the client's account does not generate New Net Profits in a given period, no performance fee will be due to us unless the client's account experiences New Net Profits in a subsequent period. The amount of the performance fee due to our firm, if any, will be determined independently with respect to each calendar year, in that a fee, once paid, will not be returned or refunded to the client. However, no further fee will be payable until the entirety of any loss carryforward amount has been recovered.

Direct Fee Deduction

Unless otherwise agreed in writing, pursuant to your consent contained in our written advisory agreement and/or your account opening agreement with the qualified custodian, our advisory fees will be paid and deducted directly from your account(s) held at the qualified custodian. We will send the qualified custodian notice of the amount of the fee to be deducted from your account each time a fee becomes due. If there is insufficient cash in your account to pay our fees, we will first liquidate money market shares to generate the cash necessary to pay such fees. However, if money market shares or cash value are not available, other investments will be liquidated instead. Please note that unexpected or premature liquidation of investments to pay our fees may impair the performance of your account.

We will only accept payment of our fees in this manner where the qualified custodian of your accounts sends you an account statement at least quarterly, reflecting all holdings in your account, their value, and a record of all transactions in your account over the period, including, without limitation, any payments of fees to us. We encourage you to promptly and carefully review the custodian's account statements upon receipt to contact us at the telephone number on the cover page of this brochure with any questions or concerns.

Termination & Refunds

Any of our advisory service offerings may be terminated by the client within five (5) days of executing a written agreement for services, without penalty.

Thereafter, either party may terminate our PWM services at any time upon ninety (90) days' written notice, for any reason, and without penalty. Likewise, either party may terminate our Personal CFO services at any time upon sixty (60) days' written notice, for any reason, and without penalty. Upon notice of termination of either service, our firm will close your account and process a pro-rata refund of any unearned advisory fees paid in advance.

Any unpaid fees due to us at the time of termination are then due and payable on a pro-rata basis.

Either party may terminate our Financial Planning services at any time upon ten (10) days' written notice, for any reason, and without penalty. Clients receive a pro-rata refund of unearned fees based on the time and effort expended by our firm through the termination date. Any unpaid fees due to us at the time of termination are then due and payable on a pro-rata basis.

Other Fees and Expenses

Separate from our advisory fees, clients may be subject to some or all of the following additional fees and costs. You should review both our advisory fees and the separate costs and expenses charged by your custodian, mutual fund(s) and ETFs, and any TPAMs to fully understand the total costs you will incur.

Mutual Fund, ETF, Private Fund, Custodial and Brokerage Charges. As part of our investment advisory services, we may recommend that you invest in mutual funds, ETFs, and in appropriate circumstances, privately offered funds or investment vehicles. The fees that you pay to our firm are separate and distinct from the internal management fees and other expenses that may be charged by mutual funds, ETFs and/or such private investment funds to their shareholders. You will also pay the broker/custodian of your account transaction charges, custodial charges, and/or brokerage fees and commissions for the purchase or sale of securities in your account. We do not share in any portion of the foregoing additional fees and expenses. To fully understand the total cost you will incur, you should review the prospectus of each fund in which you invest and the contractual arrangement with the qualified custodian of your account.

Compensation to TPAMs. TPAMs engaged by the client will receive advisory fees as described in a separate advisory agreement and/or custodian account opening documents executed by the client. These fees are separate and in addition to AWP's advisory fees. The TPAM's separate advisory fees shall be charged at rates determined by the TPAM and paid in accordance with the payment procedures set forth in the underlying advisory agreement and/or custodial account opening documents governing the client's TPAM relationship(s). In most cases, the TPAM will directly deduct its advisory fees from the client's account in same manner AWP does on either a monthly or quarterly basis. However, the specific billing procedures for TPAMs may vary. In no event will the advisory fees paid to any TPAM exceed 3.00% of the assets allocated to such TPAM.

We do not share in any portion of the advisory fees you pay to any TPAMs, nor do we act as a solicitor or agent for any TPAMs. Accordingly, we will only recommend TPAMs when the recommendation is suitable and appropriate for you in line with our role as your fiduciary.

Compensation to Other Third-Party Professionals. All fees paid to any recommended third-party professionals are separate and in addition to any advisory fees paid to us and are independently negotiated, together will all other terms and conditions of the third party engagement, between the client and the third party provider.

Miscellaneous Out-of-Pocket Expenses. Clients are charged for any out of pocket expenses, such as postage, copying, etc. Fees incurred are billed at actual cost.

Project-based Fees. Only where specifically agreed with the client in writing, we may charge certain project-based fees related to special financial consulting, analysis, and due diligence services requested by the client. As examples, these fees may take the form of a percentage of the value of personal, real property, or business property acquired by the client, a percentage of the tax or cost savings experienced by the client as a result of following our recommendations, a fixed fee, or another format.

529 Account and HSA Set Up Fees. At the client's option as part of any of our services, we may provide research, analysis, and account set up services in connection with Section 529 accounts and/or Health Savings Accounts. We charge a one-time $500 fee for such services, which includes implementation of an initial investment portfolio. At the client's further option, we will manage 529 accounts with balances of $100,000 or more for asset-based fees in accordance with the asset-based fee schedule set forth above.

Other Compensation

Compensation for Sale of Insurance Products and Securities. Certain investment advisor representatives of AWP are also licensed to sell insurance in one or more states and may be affiliated with a licensed general insurance agency (including our affiliate, Prudent Insurance, LLC) or act as a direct agent representative of a specific insurance company or companies. Insurance related business is transacted with advisory clients and licensed individuals may receive commissions from insurance products sold to clients. Clients are advised that the fees paid to us for investment advisory services are separate and distinct from the commissions earned by any individual or insurance agency (including Prudent Insurance, LLC) for selling insurance products to clients. If requested by a client, we will disclose the amount of commission expected to be paid.

The receipt of insurance related commissions by an individual associated with the firm presents a conflict of interest. As fiduciaries we must act primarily for the benefit of our investment advisory clients. As such, we will only transact insurance related business with clients when fully disclosed, suitable, and appropriate. Further, we must determine in good faith that any commissions paid to our representatives and affiliates are appropriate. Clients are informed that they are under no obligation to use any individual associated with our firm for insurance products or services. Clients may use any insurance firm or agent they choose.

Representatives of our firm are licensed real estate brokers. As a result, they can receive customary fees and commissions associated with investment real estate transactions conducted on the behalf of advisory clients. These services are independent of our advisory services and are governed under a separate engagement agreement. Clients are under no obligation to utilize this service and will not be actively solicited.

Neither AWP nor any of its related persons receive direct compensation for the sale of any securities. However, certain of AWP's personnel will benefit and receive certain additional compensation indirectly as a result of the sale of certain securities to advisory clients. Specifically, AWP may recommend to clients the purchase of interests of certain privately offered pooled investment vehicles ("Affiliated Funds") that are sponsored, managed, and advised by AWP and/or its affiliates, some or all of whom may share personnel (such entities, "Fund Management Affiliates"). AWP's Fund Management Affiliates include AWP RE, LLC and AWP Acquisitions, LLC. We may form additional Fund Management Entities in the future. The Affiliated Funds are expected to focus on the acquisition, financing, and operation of real properties identified by AWP and/or its Fund Management Affiliates. Generally, client investment in the Affiliated Funds will increase the amount of compensation due AWP's personnel, creating a conflict of interest. These conflicts of interest and how we mitigate them are addressed in further detail in Items 10 and 11 of this brochure.

Neither AWP nor its personnel receive commissions on the basis of the sale of any securities, including the interests of the Affiliated Funds. Further, neither AWP nor its personnel receive compensation arising from markups on sales of securities.

IRA Rollover Conflicts Disclosure

As part of our advisory services to you, we may recommend that you withdraw or "roll over" assets from an employer's retirement plan to an individual retirement account ("IRA") that we may advise on and which may therefore result in additional advisory fees payable to us. This type of recommendation represents a conflict of interest for our firm. You are under no obligation to follow such advice. Alternatively, you may have the options of (1) maintaining your retirement plan as is, (2) rolling over your account to the

employer's new retirement plan, (3) taking a taxable distribution, or (4) rolling over your account to a new IRA. It is important to understand the advantages and disadvantages of each approach, which will depend on individual financial circumstances. Prior to proceeding with any such action, we encourage you to contact us and your independent legal and/or tax professionals for more information.

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

Performance-based fees are fees that are based on a share of capital gains or capital appreciation experienced in a client's account. We charge performance-based fees only to "qualified clients" as that term is defined under Rule 205-3 of the Investment Advisers Act of 1940, or as otherwise permitted under applicable state law. In most states, including Florida, a qualified client generally includes any client having a net worth of greater than $2,000,000 or who places at least $1,000,000 under the management of our firm immediately after entering an agreement for advisory services. Please refer to Item 5 for additional information on this topic.

We manage accounts that are charged performance-based fees while at the same time managing accounts (perhaps with similar objectives) that are not charged performance-based fees ("side-by-side management"). Performance-based fees and side-by-side management create conflicts of interest, which we have identified and described in the following paragraphs.

Performance-based fee arrangements create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent such arrangements. In order to address this potential conflict of interest, we periodically review client accounts to ensure that investments are suitable and that the account is being managed according to the client's investment objectives and risk tolerance.

Performance-based fees may also create an incentive for our firm to overvalue investments which lack a market quotation. In order to address such conflict, we have adopted policies and procedures that require our firm to "fairly value" any investments, which do not have a readily ascertainable value.

The Performance Fee calculation also includes, in part, unrealized appreciation on open positions held in the client's account at the conclusion of a billing period. Clients are advised that such appreciation may never be realized by the client. For example, if at the end of a period the client's account had unrealized profits on open positions, AWP may receive a Performance Fee based on such unrealized profits. Following payment of the Performance Fee, those open positions might, due to adverse market conditions, be closed out at no profit or even at a loss; nevertheless, AWP would retain the entire Performance Fee paid

Side-by-side management might provide an incentive for our firm to favor accounts for which we receive a performance-based fee. For example, we may have an incentive to allocate limited investment opportunities with higher upside potential to clients who are charged performance-based fees over clients who are charged asset based fees only. To address this conflict of interest, we have instituted policies and procedures that require our firm to allocate investment opportunities (if they are suitable) in an effort to avoid favoritism among our clients, regardless of whether the client is charged performance fees.

AWP and individuals associated with our firm may manage accounts which belong either to themselves, individually, or to their family or their affiliates (collectively, "Proprietary Accounts") while simultaneously managing client accounts. It is possible that orders for Proprietary Accounts may be entered in advance of or opposite to orders for client accounts, pursuant to, for instance, a neutral allocation system, a different trading strategy, or trading at a different risk level. Proprietary Accounts may also invest in the same securities as client accounts. The management of any Proprietary Account is subject to our Code of Ethics and the duty of our firm and its personnel to exercise good faith and fairness in all matters affecting client accounts.

Item 7: Types of Clients & Account Requirements

Our firm concentrates its services on providing comprehensive advice to the following types of clients:

- Individuals and high net worth individuals;
- Trusts, estates or charitable organizations;
- Pension and profit-sharing plans; and
- Corporations, limited liability companies and other businesses.

Requirements for opening and maintaining accounts or otherwise engaging our firm are as follows:

- Financial Planning engagements are generally assessed a minimum fee of $1,500, which may be applied towards the minimum asset-based management fee if the client elects to have our firm assist with the implementation of any recommended investments.
- The minimum fee for a PWM Services account is $2,500 per year. We may waive or reduce this fee in our discretion for certain clients.
- The minimum fee for Personal CFO Services is $60,000 per year. We may waive or reduce this fee in our discretion for certain clients.

We reserve the right to waive the foregoing minimum requirements on a per client basis.

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

Methods of Analysis

We may use some or all of the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis: Fundamental analysis is the analysis of a business's financial statements (usually to analyze the business's assets, liabilities, and earnings), health, and its competitors and markets. Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts. Fundamental analysis maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by purchasing the mispriced security and then waiting for the market to recognize its "mistake" and reprice the security. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis: Technical analysis is a security analysis methodology for forecasting the direction of prices through the study of past market data, primarily price and volume. A fundamental principle of technical analysis is that a market's price reflects all relevant information, so their analysis looks at the history of a security's trading pattern rather than external drivers such as economic, fundamental and news events. Therefore, price action tends to repeat itself due to investors collectively tending toward patterned behavior – hence technical analysis focuses on identifiable trends and conditions. Technical analysis does not consider the underlying financial condition of a company or security. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of overall market movement.

Modern Portfolio Theory ("MPT"): A mathematical framework for assembling a portfolio of assets such that the expected return is maximized for a given level of risk, defined as variance. Its key insight is that an asset's risk and return should not be assessed by itself, but by how it contributes to a portfolio's overall risk and return. MPT assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk.

Mutual Fund and/or ETF Analysis: We conduct analysis of the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. The underlying assets in a mutual fund or ETF are also reviewed in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. The funds or ETFs are monitored in an attempt to determine if they are continuing to follow their stated investment strategy. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager may not be able to replicate past success. In addition, as our firm does not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the Client if that security were to fall in value. There exists risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Sector Analysis: Sector analysis involves identification and analysis of various industries or economic sectors that are likely to exhibit superior performance. Academic studies indicate that the health of a stock's sector is as important as the performance of the individual stock itself. In other words, even the best stock located in a weak sector will often perform poorly because that sector is out of favor.

Cyclical Analysis: Clinical analysis is the statistical analysis of specific events occurring at a sufficient number of relatively predictable intervals that they can be forecasted into the future. Cyclical analysis asserts that cyclical forces drive price movements in the financial markets. Risks include, cycle inversion or disappearance. There is no expectation that this type of analysis will pinpoint turning points, instead it may be used in conjunction with other methods of analysis.

TPAM Analysis: This is the analysis of the experience, investment philosophies, and past performance of independent TPAMs in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. Key factors we may consider when evaluating TPAMs are investment process, investment philosophy, risk management, historical performance, investment strategy and style, fees and operating expenses, fund size, and tax-efficiencies. Our evaluation may also incorporate both qualitative and quantitative fundamental analysis to validate and confirm a manager's investment style and skill, as well as compare them to other managers of similar style. We may utilize various research databases, proprietary models, financial periodicals, prospectuses and filings with the SEC, industry contacts and manager data, among other items, as part of the research process. Monitoring the TPAM's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment completes analysis. As part of the due-diligence process, the TPAM's compliance and business enterprise risks are surveyed and reviewed.

Investment Strategies We Use

The investment advice our firm provides is guided by each client's personal investment profile. The investment strategies we use are based on our beliefs that:

(1) "Value-driven" investment decisions may provide for a margin of safety that results in a lower probability of losing permanent capital, which may ultimately lead to long term wealth accumulation;

(2) Investment discipline structured around (a) strategic asset allocation focused on clients' long-term objectives and (b) tactical asset allocation that, from time to time, requires us to reduce overpriced assets and purchase underpriced assets, will naturally create a "buy low, sell high" framework to protect capital in down markets and reduce volatility;

(3) Allocating meaningful capital to highly qualified managers and ideas is better than over diversifying a portfolio; and

(4) It is unlikely that a single investment firm can internally employ the "best" talent to trade all types of securities and strategies; therefore, we seek out highly qualified independent third-party managers within each asset class to manage our clients' capital, where appropriate.

In line with the foregoing, we use some or all of the following strategies in managing client accounts:

Asset Allocation: Rather than focusing primarily on asset selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

There are several types of asset allocation strategies based on investment goals, risk tolerance, time frames and diversification. The most common forms of asset allocation are: strategic, dynamic, tactical, and core-satellite.

- Strategic Asset Allocation: The primary goal of a strategic asset allocation is to create an asset mix that seeks to provide the optimal balance between expected risk and return for a long-term investment horizon. Generally speaking, strategic asset allocation strategies are agnostic to economic environments, i.e., they do not change their allocation postures relative to changing market or economic conditions.

- Dynamic Asset Allocation: Dynamic asset allocation is similar to strategic asset allocation in that portfolios are built by allocating to an asset mix that seeks to provide the optimal balance between expected risk and return for a long-term investment horizon. Like strategic allocation strategies, dynamic strategies largely retain exposure to their original asset classes; however, unlike strategic strategies, dynamic asset allocation portfolios will adjust their postures over time relative to changes in the economic environment.

- Tactical Asset Allocation: Tactical asset allocation is a strategy in which an investor takes a more active approach that tries to position a portfolio into those assets, sectors, or individual stocks that show the most potential for perceived gains. While an original asset mix is formulated much like strategic and dynamic portfolio, tactical strategies are often traded more actively and are free to move entirely in and out of their core asset classes

- Core-Satellite Asset Allocation: Core-Satellite allocation strategies generally contain a 'core' strategic element making up the most significant portion of the portfolio, while applying a dynamic or tactical 'satellite' strategy that makes up a smaller part of the portfolio. In this way, core-satellite allocation strategies are a hybrid of the strategic and dynamic/tactical allocation strategies mentioned above.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Long-Term Purchases: Our firm may buy securities for your account and hold them for a relatively long time (more than a year) in anticipation that the security's value will appreciate over a long horizon. The risk of this strategy is that our firm could miss out on potential short-term gains that could have been profitable to your account, or it's possible that the security's value may decline sharply before our firm makes a decision to sell.

ETFs: An ETF is a type of Investment Company (usually, an open-end fund or unit investment trust) whose primary objective is to achieve the same return as a particular market index. The vast majority of ETFs are designed to track

an index, so their performance is close to that of an index mutual fund, but they are not exact duplicates. A tracking error, or the difference between the returns of a fund and the returns of the index, can arise due to differences in composition, management fees, expenses, and handling of dividends. ETFs benefit from continuous pricing; they can be bought and sold on a stock exchange throughout the trading day. Because ETFs trade like stocks, you can place orders just like with individual stocks - such as limit orders, good-until-canceled orders, stop loss orders etc. They can also be sold short. Traditional mutual funds are bought and redeemed based on their net asset values ("NAV") at the end of the day. ETFs are bought and sold at the market prices on the exchanges, which resemble the underlying NAV but are independent of it. However, arbitrageurs will ensure that ETF prices are kept very close to the NAV of the underlying securities.

Mutual Funds: A mutual fund is a company that pools money from many investors and invests the money in a variety of differing security types based the objectives of the fund. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate.

The benefits of investing through mutual funds may include professional management of the fund's underlying holdings; diversification achieved through the basket of securities held by the fund; access to investments through relatively low investment minimums; and liquidity of mutual fund shares. Mutual funds also have features that some investors might view as disadvantages, such as payment of related sales charges, management fees, and capital gains taxes (depending on the timing of investment), lack of transparency and ability to control mutual fund holdings; inability to obtain real-time (or close to real-time) pricing information (mutual fund's NAVs may might not be calculated until many hours after an order is placed).

It is important to note that when an investor buys and holds mutual fund shares, the investor will owe income tax on any ordinary dividends in the year the investor receives or reinvests them. Moreover, in addition to owing taxes on any personal capital gains when the investor sells shares, the investor may have to pay taxes each year on the fund's capital gains. That is because the law requires mutual funds to distribute capital gains to shareholders if they sell securities for a profit and prohibits them from using losses to offset these gains.

Individual Stocks: A common stock is a security that represents ownership in a corporation. Holders of common stock exercise control by electing a board of directors and voting on corporate policy. Investing in individual common stocks provides us with more control of what you are invested in and when that investment is made. Having the ability to decide when to buy or sell helps us time the taking of gains or losses. Common stocks, however, bear a greater amount of risk when compared to certificate of deposits, preferred stock and bonds. It is typically more difficult to achieve diversification when investing in individual common stocks. Additionally, common stockholders are on the bottom of the priority ladder for ownership structure; if a company goes bankrupt, the common stockholders do not receive their money until the creditors and preferred shareholders have received their respective share of the leftover assets.

Fixed Income: Fixed income (including treasuries, money market instruments, corporate bonds, asset-backed securities, municipal bonds and international bonds) is a type of investment or budgeting style for which real return rates or periodic income is received by the investor at regular intervals and at reasonably predictable levels. The interest payment on fixed-income securities is considered regular income and is determined based on the creditworthiness of the borrower and current market rates. In general, bonds and fixed-income securities with longer-dated maturities pay a higher rate, also referred to as the coupon rate, because they are considered riskier. The longer the security is on the market, the more time it has to lose its value and/or default. At the end of the bond term, or at bond maturity, the borrower returns the amount borrowed, also referred to as the principal or par value.

Variable Annuities ("VA"): A VA is a type of annuity contract that allows for the accumulation of capital on a tax-deferred basis. As opposed to a fixed annuity that offers a guaranteed interest rate and a minimum payment at annuitization, VAs offer investors the opportunity to generate higher rates of returns by investing in equity and bond sub-accounts. If a VA is annuitized for income, the income payments can vary based on the performance of the subaccounts. Risks associated with VAs may include:

- Taxes and federal penalties for early withdrawal
- Enduring surrender charges for early withdrawal
- Earnings taxed at ordinary income tax rates
- Mortality expense to compensate the insurance company for insurance risks
- Fees and expenses imposed for the subaccounts
- Other features with additional fees and charges
- Investment losses

Private Placement Life Insurance: Private placement life insurance ("PPLI") products are long-term investments similar to variable life insurance products, except that purchasers are able to invest policy premiums into various alternative investments. In addition to the risks associated with VAs set forth above, PPLI products also present the risk that, as unregistered securities products, they are not subject to the same regulatory requirements and oversight as their registered counterparts. PPLI products are not be suitable for all investors. An investment in PPLI products is subject to fluctuating values of the underlying investment options and it entails risk, including the possible loss of principal. You should consider the investment objectives, risks, charges and expenses of any PPLI product carefully before investing. Additional risk disclosures and other important information about PPLI products are contained in their offering memorandums, which clients are urged to carefully review with their tax and legal advisors before investing.

Cash and Cash Equivalents: Our firm generally invests client cash balances in money market funds, FDIC Insured CDs, high-grade commercial paper and/or government backed debt instruments. Ultimately, our firm tries to achieve the highest return on client cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so us to allow us to avail the client of investment opportunities and/or to pay advisory fees without having to liquidate other holdings unexpectedly or prematurely.

Risks

General: Investing in securities involves a risk of loss, (including the risk of total loss) that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing in the stock market, are appropriately diversified in investments, and ask any questions. Past performance is not a guarantee of future returns.

Incomplete or Inaccurate Client Information: The investments recommended by our firm are based solely upon the information you and/or your trusted advisors provide to us. We rely on this information without verification and you are responsible to advise us promptly of any material changes in such information. While we strive to consult with you on a regular basis, the lack of constant and continuous communication presents a risk insofar as your liquidity, net worth, risk tolerance and/or investment goals could change abruptly, with no advance notice to our firm, resulting in a mis-aligned investment portfolio and the potential for losses or other negative financial consequences.

Financial Risk: Financial risk is represented by internal disruptions within an investment or the issuer of an investment that can lead to unfavorable performance of the investment. Examples of financial risk can be found in cases like Enron or many of the dot com companies that were caught up in a period of extraordinary market valuations that were not based on solid financial footings of the companies.

Economic Risk: The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Strategy Risk: There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

Market Risk and Company Specific Risk: Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. The value of your portfolio may decrease if the value of an individual company or multiple companies in the portfolio decreases or if our belief about a company's intrinsic worth is incorrect. Further, regardless of how well individual companies perform, the value of your portfolio could also decrease if there are deteriorating economic or market conditions. It is important to understand that the value of your investment may fall, sometimes sharply, in response to changes in the market, and you could lose money. Investment risks include price risk as may be observed by a drop in a security's price due to company specific events (e.g. earnings disappointment or downgrade in the rating of a bond) or general market risk (e.g. such as a "bear" market when stock values fall in general). For fixed-income securities, a period of rising interest rates could erode the value of a bond since bond values generally fall as bond yields go up. When investing in particular stocks, there is the risk that the underlying company will perform poorly or have its value reduced based on factors specific to the company or its industry.

ETF & Mutual Fund Risk: The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds.

Fixed Income Securities Risk: Typically, the values of fixed-income securities change inversely with prevailing interest rates. Therefore, a fundamental risk of fixed-income securities is interest rate risk, which is the risk that their value will generally decline as prevailing interest rates rise, which may cause your account value to likewise decrease, and vice versa. How specific fixed income securities may react to changes in interest rates will depend on the specific characteristics of each security. Fixed-income securities are also subject to credit risk, prepayment risk, valuation risk, and liquidity risk. Credit risk is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of a bond to decline.

Interest Rate Risk: Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Liquidity Risk: Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

TPAM Risk: The risk of investing with a TPAM who has been successful in the past is that they may not be able to replicate that success in the future. In addition, as our firm does not control the underlying investments in a TPAM's portfolio, there is also a risk that a TPAM may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as our firm does not control the TPAM's daily business and compliance operations, our firm may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

As of the date of this firm brochure, neither AWP nor any of its related persons are or intend to become registered as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or registered representative of associated person of any of the foregoing.

As described at Item 5 of this brochure, (i) representatives of our firm are licensed as life insurance agents/brokers and/or as real estate brokers and (ii) we are affiliated with Prudent Insurance, LLC, a general insurance agency. The foregoing relationships create conflicts of interest between our firm and the client. Please see Item 5 for further information on how we address the conflicts of interest presented by these arrangements.

As described in Item 5 of this brochure, certain of AWP's related persons may also be affiliated with AWP's Fund Management Affiliates, which in-turn sponsor, manage, and advise the Affiliated Funds. Conflicts of interest may exist with respect to such persons' allocation of their time and effort to AWP's advisory clients and the Fund Management Entities. For example, because the compensation these individuals may receive as a result of their efforts on behalf of AWP and the Fund Management Entities varies in character (i.e., asset-based, performance-based, a combination of the two, etc.) and amount, these individuals may be incentivized to allocate more of their time and effort to one or more entities over one or more others. To address this conflict, AWP's personnel are required to act at all times in accordance with AWP's Codes of Ethics (discussed in Item 11 of this brochure) and to act only from principles of fair and equitable dealing and good faith with respect to all AWP's advisory clients. Please see Item 11 for more details.

AWP is affiliated with AWP Tax Planning, LLC ("AWP Tax") as a result of common ownership and shared management personnel. AWP Tax offers tax planning and tax return preparation services and advisory clients of AWP may be referred to AWP Tax for these services. Referrals to of our advisory clients to AWP Tax may create a conflict of interest, which the firm attempts to mitigate by acting in the best interest of our clients. We will only refer you to AWP Tax when we believe it to be in your best interests. Clients are under no obligation to utilize the services of AWP Tax.

AWP is affiliated with Stephen T. Olson, Inc., as a result of common ownership and shared management personnel. Stephen T. Olson, Inc. is a licensed real estate brokerage firm and advisory clients of AWP may be referred to Stephen T. Olson, Inc. for commercial or multifamily investment real estate brokerage services. Referrals to of our advisory clients to Stephen T. Olson, Inc. may create a conflict of interest, which the firm attempts to mitigate by acting in the best interest of our clients. We will only refer you to Stephen T. Olson, Inc. when we believe it to be in your best interests. Clients are under no obligation to utilize the services of Stephen T. Olson, Inc.

Stephen T. Olson, the manager of our firm, is also the manager of Monstro PCFO, LLC, a registered investment advisor, where he also serves as that firm's Chief Compliance Officer. Mr. Olson is further a principal of Monstro, LLC, which expects to offer web-based investment and financial management services. It is possible that advisory clients of AWP may be solicited to engage the services of Monstro PFCO, LLC and/or Monstro, LLC. To mitigate conflicts of interest which may arise as a result of these arrangements, AWP and Mr. Olson, as a fiduciary, will only act in the client's best interest. Upon client request, we will disclose any additional compensation that Mr. Olson, Monstro PCFO, LLC, and/or Monstro, LLC will receive as a result of any related transactions entered with advisory clients.

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

As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transaction and insider trading. Our firm requires all representatives to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment with our firm, and at least annually thereafter, all representatives of our firm must acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively impact or appear to impact our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

Our firm recognizes that the personal investment transactions of our representatives demands the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some securities.

In order to prevent conflicts of interest, our firm has established procedures for transactions effected by our representatives for their Proprietary Accounts[1]. In order to monitor compliance with our personal trading policy, our firm has pre-clearance requirements and a quarterly securities transaction reporting system for all of our representatives.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. Likewise, related persons of our firm buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize these conflicts of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available to clients, free of charge, upon request. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day, unless included in a block trade.

AWP shares common personnel with the Fund Management Entities which sponsor and provide advisory services to the Affiliated Funds. Such shared personnel may privately offer the securities of the Affiliated Funds to AWP's advisory clients, where appropriate. Should any advisory client invest in any Affiliated Fund(s), the shared personnel will indirectly receive compensation as a result; specifically, such clients will be subject to certain reallocations of profits and payments of management and acquisition fees payable and reallocable to the Fund Management Entities. AWP's personnel will receive a portion of these fees and profit reallocations. Neither AWP nor its related persons receive any sales based commissions, mark-ups, spreads, premiums, or other similar remuneration as a result of investment by any AWP client in the Affiliated Funds.

We mitigate the conflicts of interest arising as a result of the above described arrangements by requiring that AWP and its related persons only recommend investment in the Affiliated Funds to advisory clients when the same is in-line with their fiduciary duty to the client and investment in the Affiliated Funds is in-line with the client's investment objectives, needs, and tolerance for risk. Additionally, prior to making an investment in any Affiliated Fund, clients are urged to obtain a comprehensive understanding of the terms and conditions of the investment by reviewing the applicable private offering memorandum, fund operating agreement, subscription documents, organizational documents, and/or other important information regarding the investment objectives, underlying investments, investment time-horizon, costs, fees, tax implications, and the risks associated with participation in the Affiliated Fund. We always encourage Clients to review these documents with their independent legal and tax counsel.

Except as described above, neither our firm nor our related persons recommend, buy or sell for client accounts securities in which our firm or any related person has a material financial interest without prior disclosure to the client.

Item 12: Brokerage Practices

Selecting a Brokerage Firm

Client assets must be maintained by a qualified custodian, typically a broker-dealer and/or banking institution. Our firm seeks to recommend a custodian who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services (i.e., best execution). The factors considered, among others, may include:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

In seeking best execution for clients, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates, to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions.

In view of these considerations, our firm recommends that clients use the brokerage services of Charles Schwab & Co., Inc. ("Schwab") and/or TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TDI") Both Schwab and TDI are members of FINRA and the SIPC. Our firm is independently owned and operated, and not affiliated with Schwab or TDI.

[1] For purposes of the policy, our associates' personal accounts generally include any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

Schwab and/or TDI will hold client assets in a brokerage account and buy and sell securities when instructed to do so by AWP. While our firm recommends that clients use Schwab and/or TDI as their custodian/broker, clients will decide whether to do so and open an account with Schwab and/or TDI by entering into an account agreement directly with them. Our firm does not open the account. The client authorizes our firm to direct the execution of any transactions for the client's account through the client's chosen custodian.

Schwab Disclosures. Where your account is maintained at Schwab, our firm will use Schwab as the broker to execute trades. Schwab generally does not charge a separate fee for custody services, but is compensated by charging commissions or other fees to clients on trades that are executed or that settle into the Schwab account. For some accounts, Schwab may charge your account a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's commission rates and/or asset-based fees applicable to client accounts were negotiated based on our firm's commitment to maintain a minimum threshold of assets in accounts at Schwab. This commitment benefits clients because the overall commission rates and/or asset-based fees paid are lower than they would be if our firm had not made the commitment. In addition to commissions or asset-based fees, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that our firm has executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. Since trades for accounts custodied at Schwab are expected to be executed exclusively utilizing Schwab's execution services, we generally do not expect to incur any "trade away fees" in client accounts, although they may occur on occasion. These fees are in addition to the commissions or other compensation paid to the executing broker-dealer. Because of this, in order to minimize client trading costs, our firm has Schwab execute most trades for the accounts.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like our firm. They provide our firm and clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help manage or administer our client accounts while others help manage and grow our business. Schwab's support services are generally available on an unsolicited basis (our firm does not have to request them) and at no charge as long as our firm keeps a total of at least $10 million of client assets in accounts at Schwab. If our firm has less than $10 million in client assets at Schwab, our firm may be charged quarterly service fees. Here is a more detailed description of Schwab's support services. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which our firm might not otherwise have access or that would require a significantly higher minimum initial investment by firm clients. Schwab's services described in this paragraph generally benefit clients and their accounts.

Schwab also makes available other products and services that benefit our firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both Schwab's and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts; and
- Assists with back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Technology, compliance, legal, and business consulting;
- Publications and conferences on practice management and business succession; and
- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, Schwab will arrange for third-party vendors to provide the services to our firm. Schwab may also discount or waive fees for some of these services or pay all or a part of a third-party's fees. Schwab may also provide our firm with other benefits, such as occasional business entertainment for our personnel.

Irrespective of direct or indirect benefits to our client through Schwab, our firm strives to enhance the client experience, help clients reach their goals and put client interests before that of our firm or associated persons.

TDI Disclosures. Clients should be aware that there is no direct link between TDI and AWP in connection with the advice we provide to clients. We are required to disclose that we receive economic benefits through the custody and operating relationships we maintain with TDI that are not typically available to retail investors. These benefits include the following products and services, provided by TDI (or its affiliates) without cost or at a discount: duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving representatives, access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares directly to or from client accounts), the ability to have advisory fees deducted directly from client accounts, access to an electronic communications network for client order entry and account information, access to mutual funds with no transaction fees, and discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by third-party vendors.

TDI may also pay for business consulting, professional services, and research received by AWP affiliated persons and may also pay or reimburse expenses (travel, lodging, meals, and entertainment expenses) for AWP personnel to attend conferences or meetings relating to their service platforms or to their advisor custody and brokerage services generally. Some of these products and services made available by TDI, may benefit AWP, but may not benefit its clients. Such other services made available by TDI are intended to help us manage and further develop our business enterprise, and such services may or may not depend on the amount of brokerage transactions directed to TDI.

Clients should be aware that the receipt of economic benefits by AWP described above, in and of itself, may create a conflict of interest, and may directly or indirectly influence our recommendation of TDI for custody and brokerage services. The firm attempts to mitigate this conflict by acting in the best interest of its clients.

Soft Dollars

Our firm does not receive soft dollars in excess of what is allowed by Section 28(e) of the Securities Exchange Act of 1934. The safe harbor research products and services obtained by our firm will generally be used to service all of our clients but not necessarily all at any one particular time.

Client Brokerage Commissions

Schwab and TDI do not make client brokerage commissions generated by client transactions available for our use.

Client Transactions in Return for Soft Dollars

Our firm does not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

Brokerage for Client Referrals

Our firm does not receive brokerage for client referrals.

Directed Brokerage

Neither our firm nor any of our firm's representatives have discretionary authority in making the determination of the brokers-dealers and/or custodians with whom orders for the purchase or sale of securities are placed for execution, or the commission rates at which such securities transactions are effected. Unless the client has a pre-existing brokerage relationship, our firm routinely recommends and requires that clients direct us to execute transactions through Schwab and/or TDI. Clients must independently select from our recommended custodians by completing the appropriate account opening documentation, and in doing so, direct and authorize our firm to execute transactions for the client's account through such custodian. Not all advisers have this requirement.

If the client has established pre-existing relationship with a custodian other than our recommended custodians for execution of transactions (i.e., directed brokerage), you are advised that we may be unable to seek best execution of your transactions and your commission costs may be higher than those of our recommended custodians. For example, in a directed brokerage account, you may pay higher brokerage commissions and/or receive less favorable prices on the underlying securities purchased or sold for your account because we may not be able to aggregate your order with the orders of other clients. In addition, where you direct brokerage, we may place orders for your transactions after we place transactions for clients using our recommended custodian. We reserve the right to reject your request to use a particular custodian if such selection would frustrate our management of your account, or for any other reason.

Special Considerations for ERISA Clients. A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, our firm will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of Orders

Our firm provides investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when our firm believes that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner, which is deemed equitable to the accounts involved. In any given situation, our firm attempts to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

ITEM 13: REVIEW OF ACCOUNTS

Accounts are monitored on a regular and continuous basis by the firm's Managing Principal, Stephen T. Olson. Formal client reviews are conducted at least bi-annually or more frequently at the client's request.

The nature of these reviews is to learn whether client accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable.

The client will receive brokerage statements no less than quarterly from the trustee or custodian. In addition to these statements, our firm will provide quarterly performance reports to PWM clients. The client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity.

Our firm may review client accounts more frequently than described above. Among the factors that may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

For Financial Planning clients (other than those who engage us for ongoing asset monitoring services), we will not provide updates or reviews of our financial plans or recommendations once the final version has been delivered to the client. We will only provide updates and reviews of our prior recommendations and financial plans at the specific request of the client and a subsequent written engagement for services. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for a post-financial plan meeting or update to their initial written financial plan, subject to the payment of a additional fees.

Introductory financial consultation accounts do not receive any reviews or updates of any kind following the initial meeting with the client or the delivery of an initial custom portfolio recommendation (if requested by the client) unless they separately engage our firm for such reviews and updates, subject to the payment of additional fees.

ITEM 14: CLIENT REFERRALS & OTHER COMPENSATION

Schwab and TDI

Our firm receives economic benefit from Schwab and TDI in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab and TDI. These products and services, how they benefit our firm, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability of Schwab's and/or TDI's products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

Referral Fees

Our firm does not engage paid solicitors for client referrals.

ITEM 15: CUSTODY

Client accounts are typically held by a qualified custodian such as Schwab and/or TDI. Except for our ability to directly deduct our advisory fees from client accounts, the ability to disburse or transfer certain client funds pursuant to Standing Letters of Authorization ("SLOAs") executed by clients, and as otherwise explained below in this Item 15, AWP does not have custody of client assets and shall have no liability to the client for any loss or other harm to any property in the account as the result of non-directed activities. This includes harm to any property in the account resulting from the insolvency of the custodian or any unauthorized acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the SIPC or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer. Where a client has executed a SLOA, AWP follows the guidance set forth in the SEC's no-action letter to the Investment Advisor Association dated February 21, 2017.

As a fiduciary, AWP and its personnel will always act in the best interests of its clients. The above paragraph does not limit or modify that duty in any way. Account statements sent to the client by the custodian will include fees

charged by our firm. We strongly urge you to review and compare the investment advisory fees contained in the custodial account statements and any invoices, statements, or reports received from us for accuracy. You should contact us immediately if there if there is any discrepancy or if you have any questions about your account.

As discussed in Items 5, 10 and 11, certain related persons of AWP are also affiliated with the Fund Management Affiliates which sponsor, manage and advise the Affiliated Funds. This dual affiliation results in our firm having custody over client funds that are invested in our Affiliated Funds. Because AWP is deemed to have custody of the assets invested in the Affiliated Funds by its advisory clients, the firm is subject to certain annual independent audit requirements relating to its Affiliated Funds. Each participant in the Affiliated Funds will receive periodic progress reports regarding their investment in the fund. In addition, in accordance with Rule 206(4)-2(b)(4) under the Investment Advisers Act of 1940, each Affiliated Fund will engage an independent public accountant who is subject to examination by the Public Company Accounting Oversight Board to verify the fund's assets and prepare audited financial statements at the end of each fiscal year of operations. The Affiliated Funds will distribute such audited financial statements to each participant within 120 days of the end of each fiscal year.

In addition, a limited number of clients may engage our firm to perform bill pay services and to perform other discretionary services based on power of attorney, granting our firm the discretion to disburse client funds and/or securities without first obtaining client approval. We are deemed to have actual custody over all such client assets. Accordingly, we have entered into a written agreement with an independent certified public accountant to verify by actual examination all such accounts at least once during each calendar year at a time that is chosen by the accountant without prior notice or announcement to us, and that is irregular from year to year ("surprise examination"). As part of this arrangement, the independent accountant must file a Form ADV-E with the SEC along with a copy of the audit or surprise examination report within 120 days of the audit or surprise examination's conclusion.

Item 16: Investment Discretion

We generally require clients to provide our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, our firm is authorized to execute securities transactions, determine which securities are bought and sold, the total amount to be bought and sold, and the timing of such transactions. Should clients grant our firm non-discretionary authority, our firm would be required to obtain the client's permission prior to effecting securities transactions. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

Item 17: Voting Client Securities

Our firm does not accept authority to vote client securities nor do we offer to provide clients advice regarding how to vote proxies. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. Any proxies received by us will be promptly forwarded to you. Clients are solely responsible for exercising their rights to vote as a shareholder.

Item 18: Financial Information

While we do require prepayment of more than $1,200 in fees for certain of our services, all services to be rendered on account of these prepayments are completed within six months. Our firm does not have any financial condition or commitment that impairs our ability to meet our contractual and fiduciary obligations to clients, nor have we ever been the subject of a bankruptcy proceeding.

[End of Brochure]

ATLANTIC WEALTH
PARTNERS

ITEM 1: COVER PAGE

Part 2B of Form ADV: Brochure Supplement

June 17, 2021

STEPHEN T. OLSON

759 Parkway Street
Suite 201
Jupiter, Florida 33477
Phone: 561-632-0566
atlanticwp.com

Firm Contact:

Stephen T. Olson | Founder and Managing Principal

This ADV Part 2B ("brochure supplement") provides information about Stephen T. Olson that supplements Atlantic Wealth Partners, LLC's ("Atlantic Wealth Partners") Form ADV Part 2A ("brochure"). You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Additional information about Stephen T. Olson is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Stephen T. Olson is 6285609.

ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Stephen T. Olson | Birth Year: 1987
"Steve"

Educational Background:

- 2009 – University of South Florida – Bachelor of Arts

Business Background:

- 02/2021 – Present AWP RE, LLC; Principal
- 02/2021 – Present AWP Acquisitions, LLC; Principal
- 01/2021 – Present AWP Tax Planning, LLC; Principal
- 06/2019 – Present Monstro, LLC; Principal
- 10/2017 – Present Monstro PCFO, LLC; Managing Member, Chief Compliance Officer, & Investment Advisor Representative
- 10/2017 – Present Atlantic Wealth Partners, LLC; Managing Member, Chief Compliance Officer & Investment Advisor Representative
- 09/2017 – Present Prudent Insurance, LLC; Principal and Insurance Agent
- 01/2007 – Present Stephen T. Olson, Inc.; President and Real Estate Broker
- 01/2014 –10/2017 The Center for Wealth Planning, Inc., Financial Advisor Investment Advisor Representative & Registered Representative
- 02/2011 – 12/2013 Wells Fargo Bank, NA; Banker
- 01/2009 – 12/2011 Waterway Capital Partners, Inc.; Chief Investment Officer

Exams, Licenses & Other Professional Designations:

- 2014: Series 6, 63, & 65 Exams
- FL Insurance License (Health & Life Including Annuities & Variable Contracts)
- FL Real Estate Broker's License

Mr. Olson holds the CERTIFIED FINANCIAL PLANNER™ designation offered by the CFP Board. Certified Financial Planner™, CFP® and federally registered CFP (with a 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.

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 are 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 the 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 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 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

Mr. Olson also holds the Accredited Estate Planner® designation. The AEP® designation is a voluntary certification; no federal or state law or regulation requires financial planners to hold AEP® certification.

The AEP designation is awarded by the National Association of Estate Planners and Councils ("NAEPC") to estate planners who have completed two graduate-level courses administered by The American College of Financial Services, meet specific professional requirements, and who practice as one of the following: attorney, CPA, trust officer, CLU®, CFP® certificant or ChFC®. It is awarded to

estate planning professionals who meet stringent requirements of experience, knowledge, education professional reputation, and character. NAEPC has designated The American College of Financial Services as the primary provider of the education courses required to earn the AEP® designation.

Amongst other requirements, recipients of the AEP® designation must meet the following requirements:

- Education – Recipients must complete two graduate courses through The American College of Financial Services, including a mandatory advanced estate planning course and one (1) elective course in "Financial Statements and Business Valuation and Analysis," "Business Succession Planning," "Planning for Impact in the Context of Family Wealth," "Charitable Giving Strategies," or "Executive Compensation". Alternatively, recipients must complete graduate level coursework from other approved colleges and universities.
- Engagement and Experience – Recipients must be presently and significantly involved in "estate planning activities" (defined as spending at least one-third of one's time on such matters); and meet a minimum requirement of professional experience engaged in estate planning and estate planning activities.
- Membership - Recipients are required to be members of, and continuously maintain membership in, an affiliated local or regional estate planning council where such membership is available. Where no affiliated local council membership is available, the recipient is required to continuously maintain an At-Large individual membership in the National Association of Estate Planners & Councils.
- Professional References and Good Character - Recipients must submit three (3) professional references and be in continuously good standing with their respective professional organization or licensing authority (e.g., state bar association for attorneys, etc.).
- Code of Ethics – Recipients must sign a declaration agreeing to be bound by the NAEPC's code of ethics.
- Team Concept – Recipients must acknowledge a commitment to the team concept of estate planning as defined by the NAEPC.

On an annual basis, AEP designation holders must certify or re-certify that:

1. They are continuously engaged in estate planning activities in their professional discipline;
2. They are in good standing with their respective professional organizations and/or license authorities and are not subject to any disciplinary misconduct or investigation;
3. They maintain membership in an affiliated local or regional estate planning council where such membership is available (availability must be reassessed by designee for annual recertification); otherwise they must be an individual, At-Large member of the NAEPC and maintain that membership;
4. They have abided by and will continue to abide by the NAEPC Code of Ethics;
5. They are dedicated to the team concept of estate planning; and
6. They have currently satisfied the continuing education requirements of their designated professional discipline and have maintained a minimum of thirty (30) hours of continuing education during the prior two (2) years, of which at least fifteen (15) hours were in estate planning, in order to satisfy the AEP® designation continuing education requirement.

Certification and re-certifications by designation holders are subject to audit by the NAEPC. Failure to re-certify or comply with any of the above requirements on an annual basis will subject the holder of the designation to enter inactive status and result in ineligibility to use the designation until such time as re-approved by the NAEPC.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Olson.

Item 4: Other Business Activities

Mr. Olson is a licensed insurance agent/broker. He may offer insurance products and services to advisory clients and receive customary fees and/or commissions as a result of such transactions, either directly or via Atlantic Wealth Partners' affiliate, Prudent Insurance, LLC, an independent insurance agency. A conflict of interest arises as these insurance sales create an incentive for Mr. Olson to recommend insurance products or services based on the additional compensation he may receive as a result of such sales, rather than the client's best interests. To mitigate conflicts of interest which may arise as a result of these arrangements, Mr. Olson, as a fiduciary, will only act in the client's best interest. Upon client request, Mr. Olson will disclose any additional compensation that he and/or Prudent Insurance, LLC will receive as a result of any related transactions entered with advisory clients.

Mr. Olson is also registered as an investment advisor representative of Monstro PFCO, LLC, an affiliated registered investment advisor firm, and a principal of Monstro, LLC, which expects to offer web-based investment and financial management services. It is possible that advisory clients of Atlantic Wealth Partners may be solicited to engage the services of Monstro PFCO, LLC and/or Monstro, LLC. To mitigate conflicts of interest which may arise as a result of these arrangements, Mr. Olson, as a fiduciary, will only act in the client's best interest. Upon client request, will disclose any additional compensation that he, Monstro PCFO, LLC, and/or Monstro, LLC will receive as a result of any related transactions entered with advisory clients.

Mr. Olson is also a licensed real estate broker associated with Stephen T. Olson, Inc. As such, only where explicitly agreed with the client, he may receive normal and customary fees associated with real estate transactions. To mitigate conflicts of interest which may

arise as a result of these arrangements, Mr. Olson, as a fiduciary, will only act in the client's best interest. Upon client request, will disclose any additional compensation that he and/or Stephen T. Olson, Inc. will receive as a result of any related transactions entered with advisory clients.

Mr. Olson is also the principal of AWP RE, LLC and AWP Acquisitions, LLC (collectively, the "Fund Management Affiliates"), entities which may sponsor, manage, and/or advise certain privately offered pooled investment vehicles ("Affiliated Funds") in which clients may participate. The Affiliated Funds are expected to focus on the acquisition, financing, and operation of real properties identified by Atlantic Wealth Partners and/or its Fund Management Affiliates and may pay compensation to the Fund Management Affiliates in connection with their role in sponsoring, managing, and/or advising the Affiliated Funds. As a result of these arrangements, Mr. Olson may benefit and receive certain additional compensation indirectly as a result of client participation in the Affiliated Funds. Additional conflicts of interest may exist with respect to Mr. Olson's allocation of his time and effort to Atlantic Wealth Partner's advisory clients and the Fund Management Entities. To mitigate conflicts of interest which may arise as a result of these arrangements, Mr. Olson will at all times act in accordance with Atlantic Wealth Partner's Codes of Ethics and act only from principles of fair and equitable dealing and good faith with respect to the firm's advisory clients.

For more information on how Atlantic Wealth Partners addresses the foregoing conflicts of interest, please see Item 5 of the firm brochure. You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Item 5: Additional Compensation

Except as set forth in Item 4 above, Mr. Olson does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mr. Olson is the sole owner and Chief Compliance Officer and as such has no internal supervision placed over him. He is, however, bound by our firm's Code of Ethics. Mr. Olson can be reached at the telephone number which appears on the cover page of this brochure supplement.

ATLANTIC WEALTH
PARTNERS

ITEM 1: COVER PAGE

Part 2B of Form ADV: Brochure Supplement

June 17, 2021

TAD SACHECK

759 Parkway Street
Suite 201
Jupiter, Florida 33477
Phone: 561-632-0566
atlanticwp.com

Firm Contact:

Stephen T. Olson | Founder and Managing Principal

This ADV Part 2B ("brochure supplement") provides information about Tad Sacheck that supplements Atlantic Wealth Partners, LLC's ("Atlantic Wealth Partners") Form ADV Part 2A ("brochure"). You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Additional information about Tad Sacheck is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Tad Sacheck is 6084705.

Item 2: Educational Background & Business Experience

Tad Sacheck | Birth Year: 1984

Educational Background:

- 2008: Indiana University in Bloomington; Bachelor of Art, Economics

Business Background:

- 11/2018 – Present Atlantic Wealth Partners, LLC; Operations Manager and Investment Adviser Representative
- 08/2017 – 11/2018 Raymond James; Private Wealth Advisor
- 08/2015 – 08/2017 Motiv8 Advisors; Vice President of Marketing
- 01/2013 – 08/2015 Brokers International Mountain States; Vice President of Marketing
- 05/2008 – 12/2012 USA Tax & Insurance Services Inc.; Sr. Recruiter and Business Developer

Exams, Licenses & Other Professional Designations:

- 2017: Series 7 & 63 Exams
- 2017: Accredited Asset Management Specialist (AAMS®)
- 2010: Series 65 Exam
- 2008: FL Insurance License (Health & Life Including Annuities & Variable Contracts)

Mr. Sacheck holds the Accredited Asset Management Specialist (AAMS®) designation. The College for Financial Planning® awards the AAMS® designation to students who successfully complete the program, pass the final examination and comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed. Continued use of the AAMS® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the AAMS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Sacheck.

Item 4: Other Business Activities

Mr. Sacheck is a licensed insurance agent/broker. He may offer insurance products and services to advisory clients and receive customary fees and/or commissions as a result of such transactions, either directly or via Atlantic Wealth Partners' affiliate, Prudent Insurance, LLC, an independent insurance agency. A conflict of interest arises as these insurance sales create an incentive for Mr. Sacheck to recommend insurance products or services based on the additional compensation he may receive as a result of such sales, rather than the client's best interests. To mitigate conflicts of interest which may arise as a result of these arrangements, Mr. Sacheck, as a fiduciary, will only act in the client's best interest. Upon client request, Mr. Sacheck will disclose any additional compensation that he and/or Prudent Insurance, LLC will receive as a result of any related transactions entered with advisory clients.

For more information on how Atlantic Wealth Partners addresses this conflict of interest, please see Item 5 of the firm brochure. You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Item 5: Additional Compensation

Mr. Sacheck does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Stephen Olson, Chief Compliance Officer of Atlantic Wealth Partners, supervises and monitors Mr. Sacheck's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Stephen Olson if you have any questions about Mr. Sacheck's brochure supplement at (561)-632-0566.

ATLANTIC WEALTH
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ITEM 1: COVER PAGE

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June 17, 2021

GREGGORY BRANT

759 Parkway Street
Suite 201
Jupiter, Florida 33477
Phone: 561-632-0566
atlanticwp.com

Firm Contact:

Stephen T. Olson | Founder and Managing Principal

This ADV Part 2B ("brochure supplement") provides information about Greggory Brant that supplements Atlantic Wealth Partners, LLC's ("Atlantic Wealth Partners") Form ADV Part 2A ("brochure"). You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Additional information about Greggory Brant is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Greggory Brant is 6255725.

ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Greggory Brant | Birth Year: 1989

Educational Background:

- 2013 - Duquesne University, Executive Certificate in Financial Planning
- 2012 - Robert Morris University, MBA; Business Administration
- 2011 - Robert Morris University, B.S., Financial Mathematics

Business Background:

- 05/2019 – Present Atlantic Wealth Partners, LLC; Investment Adviser Representative
- 10/2018 – 05/2019 J.P. Morgan Securities LLC; Financial Advisor
- 06/2018 – 10/2018- Unemployed
- 01/2017 – 05/2018 Ameriprise Financial; Lead Registered Associate
- 09/2014 – 01/2017 Alliance Bernstein; Senior Associate
- 04/2014 – 09/2014 JP Morgan Chase; Relationship Banker
- 10/2013– 02/2014 Evershore Financial Group; Financial Planner

Exams, Licenses & Other Professional Designations:

- 2018: SIE - Securities Industries Essentials Examination
- 2013: Series 66 – Uniformed Combined State Law Examination
- 2013: Series 7 – General Securities Representative Examination

Mr. Brant holds the CERTIFIED FINANCIAL PLANNER™ designation offered by the CFP Board. Certified Financial Planner™, CFP® and federally registered CFP (with a 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.

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 are 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 the 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 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 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 the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ITEM 3: DISCIPLINARY INFORMATION

There are no legal or disciplinary events material to the evaluation of Mr. Brant.

Item 4: Other Business Activities

Mr. Brant is a licensed insurance agent/broker. He may offer insurance products and services to advisory clients and receive customary fees and/or commissions as a result of such transactions, either directly or via Atlantic Wealth Partners' affiliate, Prudent Insurance, LLC, an independent insurance agency. A conflict of interest arises as these insurance sales create an incentive for Mr. Brant to recommend insurance products or services based on the additional compensation he may receive as a result of such sales, rather than the client's best interests. To mitigate conflicts of interest which may arise as a result of these arrangements, Mr. Brant, as a fiduciary, will only act in the client's best interest. Upon client request, Mr. Brant will disclose any additional compensation that he and/or Prudent Insurance, LLC will receive as a result of any related transactions entered with advisory clients.

For more information on how Atlantic Wealth Partners addresses this conflict of interest, please see Item 5 of the firm brochure. You should have received a copy of that brochure. Please contact us at (561) 632-0566 if you did not receive a copy of the firm's brochure or if you have any questions about the contents of this brochure supplement.

Item 5: Additional Compensation

Mr. Brant does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Stephen Olson, Chief Compliance Officer of Atlantic Wealth Partners, supervises and monitors Mr. Brant's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Olson if you have any questions about Mr. Brant's brochure supplement at (561) 632-0566.

ATLANTIC WEALTH
PARTNERS

PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM

Maintaining your trust and confidence is a high priority. You deserve to understand how we protect your privacy when collecting and using information about you. We take specific steps to safeguard that information. This notice is provided to you on behalf of Atlantic Wealth Partners, LLC.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may only disclose information collected in accordance with this policy. Atlantic Wealth Partners, LLC does not sell customer lists. We will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Atlantic Wealth Partners, LLC, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other advisers;
- To consumer reporting agencies;
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To protect your accounts/non-public information from unauthorized access or identity theft;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or Atlantic Wealth Partners, LLC;
- To service your accounts, such as by issuing checks and account statements;
- To comply with Federal, State, and Self-Regulatory Organization requirements;
- To keep you informed about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to Stephen Olson at Atlantic Wealth Partners, LLC, 759 Parkway Street, Suite 201, Jupiter, FL 33477; (561) 632-0566.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Atlantic Wealth Partners, LLC, 759 Parkway Street, Suite 201, Jupiter, FL 33477; (561) 632-0566.