FORM ADV PART 2A
DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Giving Tree Wealth Advisors. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 123-456-9780. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

ADDITIONAL INFORMATION ABOUT GIVING TREE WEALTH ADVISORS (CRD #312361) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This filing is in accordance with the annual filing requirement for investment advisors. Since the last filing of this brochure on June 30, 2022, the following has been updated:

- Item 4 assets under management calculation updated.
- Item 5 financial planning fees updated.
- Items 4 & 5 updated to add ERISA 3(21) Services.
- Grammatical errors fixed throughout document.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 4: Advisory Business

Firm Description

Giving Tree Wealth Advisors is wholly owned by two California corporations; Nicholas Ventimiglio, CDFA, Inc. (aka NVCDFA, Inc.) holding a 50% ownership stake and Kim Financial Advisors, Inc. (aka KFA, Inc.) also holding a 50% stake. Since Nicholas Ventimiglio holds 100% ownership of NVCDFA, Inc., he indirectly holds 50% of Giving Tree Wealth Advisors. Concurrently, since John J. Kim holds a 100% ownership of KFA, Inc., he indirectly holds 50% of Giving Tree Wealth Advisor.

Types of Advisory Services

ERISA PLAN SERVICES

GTWA provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans as a 3(21):

Limited Scope ERISA 3(21) Fiduciary. GTWA may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor GTWA has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using GTWA can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

   - Provide investment advice to the Client about asset classes and investment options available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. GTWA acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
   - Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
   - Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment option for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
   - Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
   - Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

   - Assist in the education of Plan participants about general investment information and the investment options available to them under the Plan. Client understands GTWA's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education

(Department of Labor Interpretive Bulletin 96-1). As such, GTWA is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. GTWA will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

GTWA may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between GTWA and Client.

3. GTWA has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to GTWA on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

FINANCIAL PLANNING:
GTWA provides a fee-based financial planning service to all clients. Clients purchasing this service will receive a written report, providing the client with a detailed financial audit and plan designed to achieve his or her stated goals and objectives. In general, the financial plan will address the following areas of concern:

1) Personal Record Aggregation: Family records, budgeting, personal liability, estate information, and financial goals.
2) Tax & Cash Flow: Income tax and spending analysis and planning for current and future years.
3) Risk Management: Cash needs at death, income needs of surviving dependents, estate planning, and disability income analysis.
4) Retirement: Analysis of current strategies and investment plans to help client achieve retirement goals.
5) Investments: Analysis of investment alternatives and their effect on a client's portfolio and progress towards financial goals.

GTWA gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals, and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, GTWA suggests that the client work closely with her/her attorney, accountant, insurance, agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion. These recommendations are not limited to any specific product or service offered by a broker/dealer or insurance company.

Following the completion of the financial plan, GTWA may provide continued analysis and consultation in the future as changes in the client's financial situation arise. The continuance of the initial engagement will be covered if GTWA managed client assets, or may be covered under a new fee arrangement.

It should be noted that a potential conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

PORTFOLIO MANAGEMENT SERVICES:
GTWA offers discretionary asset management services to advisory Clients. GTWA will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize GTWA discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

GTWA also utilizes Axos Advisory Services, a platform for advisors to connect with third party money managers (MMX). The MMX program is an open architecture service that enables a firm to mix and match third-party money managers and strategies to meet the clients' investment needs and objectives. The platform allows GTWA to have multiple models managed by different money managers within a single account. These services may be provided at no or reduced costs to Advisor as part of the business relationship with Axos Advisory Services. Although these services could create a conflict of interest by influencing which custodian the advisor recommends, as part of its fiduciary duties to clients, the advisors endeavor at all times to put the interests of its clients first.

There is no direct link between Advisor's participation in Third Party Custodians/Third Party Money Managers institutional customer programs (such as MMX) and the investment advice which the Advisor gives to its clients

The GTWA Investment Program at Axos Advisory Services is designed as follows:

Based on client's long-term investment strategy, GTWA will recommend the initial model asset allocation to be used. GTWA will, if appropriate, suggest modifications to the allocation to more adequately address the client's individual needs as well as place reasonable restrictions on the allocation among various asset classes.

Once the client's model asset allocation has been established and approved by the client, GTWA will implement the model using institutional, no-load mutual funds, low-cost exchange traded funds, and/or separately managed accounts through the MMX platform. Individual stocks may be purchased at the explicit request of the client. Portfolios are monitored by GTWA on a continuous basis but will be reviewed no less than quarterly to ensure that their investment styles, organizational structures, and performance remain consistent with the objectives of the client. The client may place reasonable restrictions on the nature of the funds and/or exchange traded funds and/or managers held and/or used in model. GTWA will assist the client in understanding and evaluating the potential impact of these restrictions on the Portfolio.

GTWA will have limited discretion regarding management of the portfolio. The scope of this authority shall include MMX manager selection (contracted to manage the active components of a client's allocation) and selection of securities (including ETFs & mutual funds) applied to the strategic asset allocations recommended by Wilshire Associates. The Adviser will conduct weekly analysis which will include but is not limited to fundamental valuations, sector rotation analysis, technical analysis, and economic research to determine if adjustments (within the boundaries as outlined above) are appropriate. These boundaries will represent the maximum and minimum levels for portfolio risk the client is willing to accept in an effort to meet their investment objectives over their designated time horizon. Unless instructed otherwise, GTWA will automatically reallocate portfolios as needed and when appropriate based on these definitions and boundaries. Should the client's individual goals and objectives change, the client should notify GTWA and the Advisor will assist the client in revising their current long-term investment strategy; and concurrently make changes to their model asset allocation and the ISA when appropriate.

ALTERNATIVE PORTFOLIO MANAGEMENT SOLUTIONS:

IARs may recommend the use of third-party independent investment advisers or asset management program sponsors that provide specialized or institutional investment advisory services. While Giving Tree Wealth Advisors does not offer wrap fee programs, these independent investment advisers may. The client should refer to the brochure of these independent advisers if such solutions are recommended. Currently, the asset management program sponsor utilized by GTWA is SEI Investments. If this solution is recommended to the client a separate and independent disclosure brochure will be provided at the time of the recommendation to the client. IARs may utilize third party Investment Policy Statements provided by this program that will detail the client's investment objectives and will include agreed upon investment strategies, limitations, and fees. Details of the SEI Investments program have been provided below in Item 5.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

GTWA does not sponsor any wrap fee programs.

Client Assets under Management

As of December 31, 2022, GTWA had $80,752,000 Client assets under management on a discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets as follows:

Account Value	Max Annual Fee
$5,000,001-$10,000,000	0.75%
$10,000,001-$20,000,000	0.50%
$20,000,000+	0.25%

The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, GTWA shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of GTWA for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. GTWA does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, GTWA will disclose this compensation, the services rendered, and the payer of compensation. GTWA will offset the compensation against the fees agreed upon under the Agreement.

PORTFOLIO MANAGEMENT WITH ASSETS CUSTODIED AT E*TRADE ADVISORY SERVICES:

The Advisory fee for the program will be charged on a straight tier as a percentage of assets under management, according the schedule below:

Account Value	Max Annual Fee
$1-$3,000,000	1.00%
$3,000,001-$5,000,000	0.75%
$5,000,001-$10,000,000	0.50%
$10,000,000+	0.25%

This is a tiered, blended fee schedule, the fee is calculated by applying different rates to different portions of the portfolio. For example: A cumulative account balances of $7MM would be charged 1.00% annually on the first $3MM based on first tier fee, then 0.75% on the next $2MM based on the second tier fee, and finally, the next $2MM is 0.50%.

Fees are billed in arrears at the end of each calendar quarter based upon the quarter end values (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance) of the client's combined accounts during the previous quarter. The fees will be calculated by the custodian and the custodian will deduct the fees from the client account. This invoice will appear on their account statement for that quarter. Clients are responsible for verifying fee computations, since custodians are not typically asked to perform this task. The specific manner in which fees are charged by GTWA is established in a client's written agreement with GTWA. Clients may also elect to be billed directly for fees or to authorize GTWA to directly debit fees from client accounts. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

When managers on the MMX program are utilized, an additional annual fee of .50% will be charged on that portion of the assets.

When utilizing mutual fund models, there will be a 10 bps custody fee unless SEI's Institutional models are used, in which custody fees will be waived. Mutual funds expense ratio will range from 3 bps to 104 bps.

ADDITIONAL ASSET MANAGEMENT FEE DISCLOSURES:
Fees exceeding 3% per annum is excessive per industry standard. Total fees collected by GTWA and third-party advisers will not exceed 3% of assets under management per annum. This disclosure applies to any and all investment programs utilized by the firm Axos Advisory Services. Our current schedule is significantly below this threshold. Any changes to our fee schedule will be properly disclosed to existing clients at the time of such change and will be updated in our annual ADV amendments.

FINANCIAL PLANNING FEES:
Planning fees are charged as a fee based on an estimate of the number of hours needed to complete the plan and to meet with the client. The hourly fee used to compute the fee will be $400 per hour. GTWA requires a minimum of $2000 (5 hours) for any financial plan, topical or comprehensive. The length of time it will take to provide a financial plan will depend on each client's personal situation. All fees are agreed upon prior to entering into a contract. A 50% retainer will be requested upon completion of GTWA's fact-finding session with the client. The remainder of the fee is due and payable upon completion of the plan.

If the Client, with the consent of GTWA wishes to renew their financial planning agreement, the fee for ongoing consultation shall be $400 per hour, due at the time of renewal of the agreement. For Clients who have assets managed by GTWA ongoing planning fees are included in the fees for portfolio management services.

GTWA will waive any ongoing financial planning fees for clients who have assets of $500,000 or more managed by GTWA.

In should be noted, the client is under no obligation to act upon this registrant's or associated person's recommendation; if the client elects to act on any of the recommendations, the client is under no obligation to effect transaction through the registrant, or associated person when person is an agent with a licensed broker/dealer or through any associate or affiliate of such person.

TERMINATION AGREEMENT & REFUND POLICY
After signing the planning agreement and submitting the first half of the fee, the client has 5 business days to sever the relationship and request a full refund. Following this 5-day period, any severance of the relationship will result in a prorated fee to the client based upon the amount of hours the advisor has already contributed to the planning. The initial 50% retainer deposit will not be refunded to the client after the 5-day refund period.

All fees are subject to negotiation.

For California Residents: Subsection (j) of Rule 260.238, California Code of Regulations requires that all investment advisers disclose to their advisory clients that lower fees for comparable services may be available from other sources.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. Fees for financial planning are paid directly to GTWA.

Fees for ERISA services will either be deducted from Plan assets or paid directly to GTWA. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

GTWA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a prospectus.

Such charges, fees and commissions are exclusive of and in addition to GTWA's fee, and GTWA shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that GTWA considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Prepayment of Client Fees

GTWA does not require any prepayment of fees of more than $500 per Client and six months or more in advance.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of GTWA receive external compensation for the sale of securities to clients as a registered representative of Fortune Financial Services, Inc., a broker-dealer and as independent insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As registered representatives, they do not charge advisory fees for the services offered through Fortune Financial Services, Inc or as an insurance agent. This conflict is mitigated by disclosures, procedures, and GTWA's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another registered representative or insurance agent of their choosing.

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

Sharing of Capital Gains

GTWA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7: Types of Clients

Description

GTWA provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, and endowments.

Account Minimums

A combined account minimum of $500,000 is required for the client to engage with the firm for investment management services. GTWA, in its sole discretion may waive this account minimum.

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

Methods of Analysis

As mentioned above, based on client's long-term investment strategy, GTWA will recommend the initial model asset allocation to be used. GTWA will, if appropriate, suggest modifications to the allocation to more adequately address the client's individual needs as well as place reasonable restrictions on the allocation among various asset classes.

Once the client's model asset allocation has been established and approved by the client, GTWA will implement the model using institutional, no-load mutual funds, low-cost exchange traded funds, stocks, bonds, and/or separately managed accounts via the MMX Platform. Assets monitored by GTWA weekly, monthly, quarterly, and annually to ensure that their investment styles, organizational structures, and performance remain consistent with the objectives of the investment plan. The client may place reasonable restrictions on the nature of the funds and/or exchange traded funds and/or managers held and/or used in model. GTWA will assist the client in understanding and evaluating the potential impact of these restrictions on the Portfolio.

Model portfolios will be rebalanced no less frequent than quarterly and when appropriate. Unless instructed otherwise by the client, GTWA will automatically reallocate (i.e., rebalance) portfolios and managers at the end of each quarter or when appropriate. Unless instructed otherwise, GTWA will automatically rebalance the client's account if the allocation among the underlying the positions deviate from the prescribed quarterly allocation by greater than a 5% variance. Rebalancing occurs with no transaction fees assessed to the client, GTWA pays for the transactional or trade related costs assessed by Axos Advisory Services. Should the client's individual goals and objectives change, the client should notify NVCDFA, INC., who will assist the client in revising their current long-term investment strategy, hence potentially making changes to their model asset allocation.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to GTWA. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with GTWA:

- *Market Risk*: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- *Interest-rate Risk*: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *REIT Risk:* To the extent that a client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to

their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

- *Derivatives Risk:* Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.

- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

- *Long-term purchases*: Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

- *Short-term purchases*: Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.

- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

- *Options Trading*: The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.

- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Leveraged Risk*: The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading and high expenses.
- *Equity Linked CD Risk:* Penalties may apply to early withdrawals. Fair market value of CD's when sold in the secondary market may be worth more or less than face value. May or may not be FDIC insured. Returns are not based solely on market returns, as there may be a maximum rate of interest the CD will earn. May be taxed on income earned, but interest isn't accrued (received) until the CD matures. Many CDs may have "call" features, allowing the bank to close the contract early with no penalty, paying back principle and any accrued interest.
- *Structured Notes Risk:* The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and there is a risk to the pricing accuracy as most structured notes do not trade after issuance.
- *Hedge Funds Risk:* The risks involved with hedge funds are that they may invest in unregistered investments that are not subject to the SEC's registration and disclosure requirements. They may have risky investment strategies, which may include speculative investment and trading strategies. Both unregistered and registered hedge funds are illiquid investments and are subject to restrictions on transferability and resale. The tax structure of investments in hedge funds may be complex.
- *Private Equity/Placement Risk:* Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.
- *Alternative Investments:* Alternative investments involve a high degree of risk and can be illiquid due to restrictions on transfer and lack of a secondary trading market. They can be highly leveraged, speculative and volatile, and an investor could lose all or a substantial amount of an investment.
- *Counterparty Risk*: The risk that the other party to an agreement will default or fail to perform its contractual obligations. In an options contract, counterparty risk is the risk to the option buyer that the option writer will not buy or sell the underlying as agreed.
- *Foreign Investment Risk*: Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and

economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

- *Senior Secured Debt*: Because senior loans can be made to non-investment grade borrowers, the risk of default may be greater. Should a borrower fail to make a payment or default, this may affect the overall return to the lender. Interest rate is another risk as interest rate changes will affect the amount of interest paid by a borrower in a floating rate senior loan.
- *Land*: Investments in land have unique risks with several restrictions and challenges. Factors to consider when in investing in land are zoning restrictions with the way the land can be used, environmental issues and access to utilities. Investing in land is a speculative investment and for small investors can be a high risk gamble of earning a fair rate of return while continuing to have expenses while holding the land.
- *Energy Infrastructure*: Investments in energy infrastructure are subject to regulatory risk political risk, social risk, technological risk, climate and environmental risk and economic risk.
- *Hedged Equity Strategies*: Hedging is a risk management strategy to offset losses by taking an opposite position in a related asset. The reduction in risk provided by hedging also typically results in a reduction in protentional profits.
- *Managed Futures*: The risks associated with managed futures strategies include returns that may be biased upwards due to the voluntary nature of self-reporting of performance. Lack of natural measuring stick or benchmark for performance rating and the potential for higher fees.
- *Preferred stock:* One risk of preferred stocks is that shares are often sensitive to changes in interest rates. Investors in these vehicles don't enjoy the same voting rights as common shareholders.
- *Bonds*: The risks associated with bonds include the inverse relationship between interest rates and bond prices. As interest rates fall, bond prices rise. Conversely, when interest rates rise, bond prices tend to fall. Investors must also be aware of credit/default risk, corporate bonds aren't guaranteed by the full faith and credit of the U.S. government, but instead depend on the issue's ability to repay the debt.

Item 9: Disciplinary Information

Criminal or Civil Actions

Neither GTWA nor its management have been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Neither GTWA nor its management have been involved in administrative enforcement proceedings.

Self- Regulatory Organization Enforcement Proceedings

GTWA and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of GTWA or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

GTWA is not registered as a broker- dealer, however, Member Nicholas Ventimiglio is a registered representative of Fortune Financial Services, Inc., a FINRA/SIPC broker-dealer.

Futures or Commodity Registration

Neither GTWA nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Nicholas Ventimiglio is separately licensed as a registered representative and an investment advisor representative of Fortune Financial Services, Inc. ("Fortune"), a FINRA registered broker/dealer. The partner known as John J. Kim is separately licensed as an investment advisor representative of Kim Financial Advisors, Inc. (KFA), a California Registered Investment Advisor. Partners of GTWA, and other associated persons may also be independent insurance agents for various insurance companies. In these separate capacities, GTWA partners and other associated person will be able to effect securities transactions and broker insurance products for advisory and non-advisory clients in the course of assisting GTWA clients implement their financial plan. The choice for these clients to use Nicholas Ventimiglio, John J. Kim, and other associated persons in this capacity is at the sole discretion of the clients. Clients are in no way obligated to use the GTWA partners or other associated persons to execute these transactions. As stated above, the partners and other associated persons may receive separate, yet customary compensation for effecting any transactions.

All material conflicts of interest under CCR Section 260.238(k) have been disclosed regarding the investment adviser, it's representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

GTWA has access to third party managers via Axos Advisory Services. See item 4 for more details.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of GTWA have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of GTWA affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of GTWA. The Code reflects GTWA and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

GTWA's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of GTWA may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

GTWA's Code is based on the guiding principle that the interests of the Client are our top priority. GTWA's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

GTWA will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

GTWA and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

GTWA and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide GTWA with copies of their brokerage statements.

The Chief Compliance Officer of GTWA is Nicholas Ventimiglio. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with GTWA's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. GTWA will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

It is GTWA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. GTWA will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

GTWA will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. GTWA will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. GTWA relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by GTWA. GTWA does not receive any portion of the trading fees.

GTWA will require the use of Axos Advisory Services or SEI.)

- *Research and Other Soft Dollar Benefits*
  The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by GTWA from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. GTWA does not receive any soft dollars.
- *Brokerage for Client Referrals*
  GTWA does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- *Directed Brokerage*
  GTWA does not allow directed brokerage accounts.

Aggregating Securities Transactions for Client Accounts

Trading transactions (i.e. purchases and sales of securities) related to client accounts are aggregated automatically by the custodians utilized by GTWA in an effort to ensure that all clients receive best execution.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

While the underlying securities within GTWA's investment supervisory services are continuously monitored directly or indirectly, the client accounts are formally reviewed at least quarterly or as needed by the associated person of GTWA assigned to the client. At present the associated person would be either Nicholas Ventimiglio or John J. Kim. More frequent reviews may be triggered by material changes in variables such as a client's individual circumstances, or the market, political, and/or economic environment. Financial plans will be reviewed on a client's request or at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Investment supervisory service clients will receive quarterly account statements from their custodian outlining their portfolio. GTWA will provide quarterly performance reports as well as tax summary reports associated with their accounts. GTWA may also provide consolidated account statements outlining all accounts held with the custodian. Clients may request to have account statements sent to them monthly.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Mr. Ventimiglio receives external compensation for the sale of securities to Clients as a registered representative of Fortune Financial Services, Inc., a broker-dealer.

Advisory Firm Payments for Client Referrals

GTWA does not compensate for Client referrals.

Item 15: Custody

Account Statements

Clients will receive, at least quarterly, statements from the qualified custodian that holds and maintains client's investment assets. GTWA urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

The investment adviser has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, the investment adviser concurrently:

- Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

The investment adviser notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided in this paragraph (b)(3). Such notification is required to be given on Form ADV.

Item 16: Investment Discretion

Discretionary Authority for Trading

GTWA requires discretionary authority from the client at the outset of an advisory relationship to select the identity and number of securities to be bought or sold. GTWA has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize GTWA discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When selecting securities and determining amounts, GTWA observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, GTWA's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Investment guidelines and restrictions must be provided to GTWA in writing.

Item 17: Voting Client Securities

Proxy Votes

As a matter of firm policy and practice, GTWA does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive their proxies or other solicitations directly from the custodian or a transfer agent.

When assistance on voting proxies is requested, GTWA will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

Since GTWA does not you require or solicit prepayment of more than $500 in fees per client, six months or more in advance, no balance sheet disclosures have been made.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

GTWA has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

GTWA has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither GTWA nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither GTWA nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
    a) An investment or an investment-related business or activity;
    b) Fraud, false statement(s) or omissions;
    c) Theft, embezzlement or other wrongful taking of property;
    d) Bribery, forgery, counterfeiting, or extortion;
    e) Dishonest, unfair or unethical practices.

2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    a) An investment or an investment-related business or activity;
    b) Fraud, false statement(s) or omissions;
    c) Theft, embezzlement or other wrongful taking of property;
    d) Bribery, forgery, counterfeiting, or extortion;
    e) Dishonest, unfair or unethical practices.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Nicholas Ventimiglio

Office Address:
2603 Camino Ramon #200
San Ramon, CA 94583

Tel: 844-434-6435

Email: nick@givingtreewealth.com

Website: **www.GivingTreeWealth.com**

March 2, 2023

This brochure supplement provides information about Nicholas Ventimiglio and supplements the Giving Tree Wealth Advisors brochure. You should have received a copy of that brochure. Please contact Nicholas Ventimiglio if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT NICHOLAS VENTIMIGLIO (CRD #4595708) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Nicholas Ventimiglio

- Year of birth: 1979

Item 2 - Educational Background and Business Experience

Education: Graduated from California Polytechnic State University, San Luis Obispo in 2002 with a Bachelor of Science degree in Business Administration with a concentration in Finance.

Business Experience:

- Giving Tree Wealth Advisors.; President or Managing Member/Investment Advisor Representative; 01/2021-Present
- Fortune Financial Services, Inc.; Registered Representative; 02/2016-Present
- Nicholas Ventimiglio, CDFA.; Owner; 04/2010-Present
- First Allied Advisory Services, Inc.; Investment Advisor Representative; 07/2012-02/2016
- First Allied Securities, Inc.; Registered Representative; 07/2007-02/2016
- Financial Telesis; Registered Representative; 02/2005-07/2007
- Kim Financial Advisors; Investment Advisor; 06/2004-07/2007
- Mass Mutual Life Insurance; Agent; 10/2002-06/2004
- Mass Mutual Life Investors Services Inc.; Registered Representative; 10/2002-06/2004
- Applebee's; Server; 06/2002-06/2004
- California Poly University; Student; 01/2000-06/2002

Item 3 - Disciplinary Information

A. Mr. Ventimiglio has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. Ventimiglio never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;

2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

   (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than $2,500 on him.

C. Mr. Ventimiglio has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or

2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than $2,500.

D. Mr. Ventimiglio has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Mr. Ventimiglio has a financial affiliated business as an insurance agent and a registered representative with a broker dealer. Approximately 50% of his time is spent on these activities. He will offer Clients services from those activities. As an insurance agent, he will receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 5 - Additional Compensation

Mr. Ventimiglio receives commissions on the securities and insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Since Mr. Ventimiglio is the Chief Compliance Officer of GTWA, he is solely responsible for all supervision and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Nick@GivingTreeWealth.com or 844-434-6435 .

Item 7 - Requirements for State-Registered Advisors

A. Mr. Ventimiglio has not been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of $2,500 involving any of the following:

   a) An investment or an investment-related business or activity;
   b) Fraud, false statement(s) or omissions;
   c) Theft, embezzlement or other wrongful taking of property;
   d) Bribery, forgery, counterfeiting, or extortion;
   e) Dishonest, unfair or unethical practices.

2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

   a) An investment or an investment-related business or activity;
   b) Fraud, false statement(s) or omissions;
   c) Theft, embezzlement or other wrongful taking of property;
   d) Bribery, forgery, counterfeiting, or extortion;
   e) Dishonest, unfair or unethical practices.

B. Mr. Ventimiglio has never been the subject of a bankruptcy petition.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

John Juhan Kim

Office Address:
2603 Camino Ramon #200
San Ramon, CA 94583

Tel: 844-434-6435

Email: john@givingtreewealth.com

Website: www.GivingTreeWealth.com

March 2, 2023

This brochure supplement provides information about John Juhan Kim and supplements the Giving Tree Wealth Advisors brochure. You should have received a copy of that brochure. Please contact John Juhan Kim if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT NICHOLAS VENTIMIGLIO (CRD #2399257) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – John Juhan Kim

- Year of birth: 1970

Item 2 - Educational Background and Business Experience

Education: Graduated from the University of California, Santa Barbara with a Bachelor of Arts degree in Biology Pre-Med / Biology

Business Experience:

- Giving Tree Wealth Advisors.; Managing Partner/Investment Advisor Representative; 01/2021-Present
- Kim Financial Advisors, Inc.; Investment Advisor Representative; 04/2001-Present
- LPL Financial LLC; Registered Representative; 09/2014-09/2020
- Financial Telesis Inc.; Registered Representative; 03/2004-09/2014
- North coast Securities Corp.; Registered Representative; 02/2000-03/2004
- The Advisors Group, Inc.; Registered Representative; 07/1995-02/2000
- The Acacia Group; Account Manager; 07/1995-02/2000
- The Lincoln National Life Insurance Company; Not provided; 08/1993-07/1995
- Lincoln Financial Advisors Corporation; Not provided; 08/1993-07/1995
- Lincoln Financial & Insurance Services; Registered Representative; 07/1993-06/1995

Item 3 - Disciplinary Information

E. Mr. Kim has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

5. Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
6. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
7. Was found to have been involved in a violation of an investment-related statute or regulation; or
8. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

F. Mr. Kim never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

3. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;

4. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

   (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than $2,500 on him.

G. Mr. Kim has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

   3. Was found to have caused an investment-related business to lose its authorization to do business; or

   4. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than $2,500.

H. Mr. Kim has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Mr. Kim has no other business activities to disclose.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 5 - Additional Compensation

Mr. Kim receives no additional compensation for advisory services.

Item 6 - Supervision

Mr. Kimi is supervised by Mr. Ventimiglio, the Chief Compliance Officer of GTWA, he is solely responsible for all supervision and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Nick@GivingTreeWealth.com or 844-434-6435 .

Item 7 - Requirements for State-Registered Advisors

C. Mr. Kim has not been involved in any of the following:

   3. An award or otherwise been found liable in an arbitration claim alleging damages in excess of $2,500 involving any of the following:

      f) An investment or an investment-related business or activity;
      g) Fraud, false statement(s) or omissions;
      h) Theft, embezzlement or other wrongful taking of property;
      i) Bribery, forgery, counterfeiting, or extortion;
      j) Dishonest, unfair or unethical practices.

   4. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

      f) An investment or an investment-related business or activity;

g) Fraud, false statement(s) or omissions;
h) Theft, embezzlement or other wrongful taking of property;
i) Bribery, forgery, counterfeiting, or extortion;
j) Dishonest, unfair or unethical practices.

D. Mr. Kim has never been the subject of a bankruptcy petition.