Item 1 - Cover Page

ATLAS PRIVATE WEALTH MANAGEMENT, LLC

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November 3, 2022

Atlas Private Wealth Management, LLC is an SEC-registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training. The oral and written communications an adviser provides you can assist you in determining whether to hire or retain the adviser.

This brochure provides information about the qualifications and business practices of Atlas Private Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (800) 432-7447 or at cco@atlaspwm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Atlas Private Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The United States Securities and Exchange Commission requires Atlas Private Wealth Management, LLC ("Atlas," "we," or the "Firm") to summarize all material changes since the last annual update of its Form ADV brochure ("Brochure") and to offer to provide the entire Brochure free of charge. Since the last annual update of our Brochure on March 25, 2022, we note the following material changes:

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Credit Solutions, LLC ("FTCS"). FTCS does not receive any compensation from such third-party institutions for serving our clients. Further information on this conflict of interest is available in Items 4, 5, and 10 of this Brochure.

We manage held-away accounts that are maintained at independent third-party custodians. Further information about this service is available in Items 4 and 5.

This summary does not contain detail about every revision to the Brochure; clients are encouraged to review the Brochure in its entirety. A complete brochure may be obtained by contacting cco@atlaspwm.com or (800) 432-7447. You may request such brochure at any point during the year, and it will be provided to you without charge. Additional information about Atlas Private Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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ATLAS PRIVATE WEALTH MANAGEMENT, LLC

Atlas Private Wealth Management, LLC ("Atlas"), previously known as Dion Money Management Inc., was founded in 1995.

Atlas provides wealth management services, as well as investment management, personal financial planning, and retirement planning services. Additionally, Atlas provides financial counseling services to employees of independent schools, offers 3(21) fiduciary and non-fiduciary services to participant-directed employee retirement benefit plans, and provides tax planning/preparation and business consulting services.

We offer investment management services primarily with respect to mutual fund and ETF portfolios, which generally invest in mutual funds and exchange-traded funds ("ETFs") (or other investments such as equity or debt securities or cryptocurrency related investments when appropriate), and individually managed accounts, which generally invest in a broader range of securities.

Previously, Atlas offered a mutual fund asset allocation service, Investment RE-Allocation Service ("REAL"), for smaller, tax-deferred accounts (e.g., IRAs and 403(b)s) and accounts holding annuities. Atlas no longer offers this service option to new accounts, but continues to manage legacy accounts that were established prior to discontinuation of Atlas' offering the REAL service.

FOCUS FINANCIAL PARTNERS, LLC

Atlas is part of the Focus Financial Partners, LLC ("Focus LLC") partnership. Specifically, Atlas is a wholly owned subsidiary of Connectus Group, LLC, which is a wholly-owned subsidiary of Focus Operating, LLC ("Focus Operating"), which is a wholly-owned subsidiary of Focus LLC. Focus Financial Partners Inc. ("Focus Inc.") is the sole managing member of Focus LLC and is a public company traded on the NASDAQ Global Select Market. Focus Inc. owns approximately two-thirds of the economic interests in Focus LLC.

Focus Inc. has no single 25% or greater shareholder. Focus Inc. is the managing member of Focus LLC and has 100% of its governance rights. Accordingly, all governance is through the voting rights and Board at Focus Inc.

Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, business managers, and other firms (the "Focus Partners"), most of which provide wealth management, benefit consulting, and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

INVESTMENT ADVISORY SERVICES

Atlas provides investment advisory and management services based on the individual needs of the client as well as the client's financial profile. Atlas meets with the client to review the client's financial situation, which may include a review of assets and liabilities, cash flow, taxes, anticipated short-term events, risk management, and estate structures. Through these personal discussions, Atlas documents the client's investment goals and objectives, develops the client's personal profile, and manages the portfolio based on that profile. Atlas manages advisory accounts on a discretionary, fee-only basis.

A client may impose reasonable restrictions on securities held in their accounts. If a client informs Atlas that they do not want to purchase or sell specific securities, Atlas will generally restrict trading in the client's account so that the restricted securities are not purchased or sold. See Item 16 - *Investment Discretion* for additional information.

Atlas implements investment advice on behalf of clients in certain held-away accounts – for example, 401(k) or 529 plan accounts – maintained either at the custodians with whom we have an institutional relationship or at other independent third-party custodians. We have the capability to review, monitor, and manage these held-away accounts in a fashion similar to the way in which we review, monitor, and manage accounts that are not held away.

Atlas serves as the investment adviser with respect to certain donor-advised funds described in Internal Revenue Code Section 4966(d)(2), giving vehicles whereby donors make tax deductible, irrevocable charitable contributions of assets to a donor-advised fund sponsoring organization ("DAF Sponsor"), and the donor has certain input with respect to distributions from and investments within the donor-advised fund.

FIDUCIARY SERVICES

Atlas also offers fiduciary and non-discretionary advisory services ("3(21) Fiduciary Services") to certain participant-directed employee retirement benefit plans. Atlas acts as a 3(21) fiduciary as defined in the Employee Retirement Income Security Act ("ERISA"). As such, Atlas assists the plan sponsor in selecting, reviewing, and evaluating the performance of an investment manager, and meets with the plan sponsor periodically to discuss that investment manager's performance and retention. Atlas will also meet with the plan sponsor periodically to review and discuss investment reports. Additionally, Atlas also provides non-fiduciary services to the plan sponsor, including educating the plan sponsor on its fiduciary responsibilities; assisting the plan sponsor in monitoring, selecting, and supervising service vendors (and coordinating the transition process should the plan sponsor determine to replace a vendor); and assisting in the group enrollment meetings for the purpose of increasing both plan participation by the plan sponsor's employees and investment and financial understanding by the plan sponsor's employees. Atlas will also assist in the education of plan participants and provide guidance about general investment principles and the investment alternatives under the plan.

Plan sponsors who engage us for services to participant-directed retirement plans will enter into an investment advisory and management agreement among the plan sponsor, Atlas, and

Buckingham Strategic Partners, LLC ("BSP"), an Atlas affiliate. Atlas, like BSP, is an indirect wholly owned subsidiary of Focus LLC and is therefore under common control with BSP. Under this arrangement, BSP will provide services as the 3(38) investment manager, including discretionary investment management services. BSP will exercise discretionary authority to select in accordance with the plan's goals and objectives those plan investments to be made available to plan participants.

Atlas is a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA") with respect to investment management services and investment advice provided to ERISA plan clients, including plan participants. Atlas is also a fiduciary under section 4975 of the Internal Revenue Code (the "IRC") with respect to investment management services and investment advice provided to individual retirement accounts ("IRAs"), ERISA plans, and ERISA plan participants. As such, Atlas is subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a "PTE").

As a fiduciary, we have duties of care and of loyalty to you and are subject to obligations imposed on us by the federal and state securities laws. As a result, you have certain rights that you cannot waive or limit by contract. Nothing in our agreement with you should be interpreted as a limitation of our obligations under the federal and state securities laws or as a waiver of any unwaivable rights you possess.

FINANCIAL PLANNING SERVICES

Atlas also offers a broad range of personalized and comprehensive financial planning services under separate letters of engagement. These services provide a comprehensive review of areas relevant to and specifically requested by the client and mutually agreed upon. Such financial planning matters include, but are not limited to, budget and cash planning, retirement planning and projections (accumulation and distribution planning), Roth IRA conversion analysis, education planning/funding analysis, investment analysis re: taxable and tax-advantaged accounts, estate and gift planning, employee benefit/stock option analysis and planning, and any other such financial planning concerns defined at the commencement of the engagement. Additionally, for those financial planning clients who have engaged Atlas for tax preparation services, Atlas will also provide income tax planning services under that separate arrangement.

Atlas also offers financial counsel for independent schools, whereby the schools engage Atlas to provide financial counseling to those of its employees who elect to participate. Depending on the employee, financial counseling sessions may not involve a review of a financial plan or a discussion of investments. A review will typically consist of a written report presented to the participating employee within a short period of time after the consultation session has concluded. Those participants who are interested in more substantial reviews may enter into individual financial planning agreements with Atlas at any time.

The client is under no obligation to act upon any of Atlas' financial planning recommendations. Should the client determine to adopt any or all of Atlas' recommendations, the client will be responsible for their implementation.

Atlas does not serve as an attorney, accountant, or insurance agency, and no portion of Atlas' services should be construed as legal or accounting services. Accordingly, Atlas neither prepares trust or estate planning documents, nor sells insurance products. To the extent requested by a client, Atlas may recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, or insurance agents, etc.). Clients are under no obligation to engage the services of any recommended professional. If the client engages any recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged professional(s) (i.e., attorney, accountant, or insurance agent, etc.), and not Atlas, shall be responsible for the quality and competence of those services provided.

OTHER SERVICES

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Credit Solutions, LLC ("FTCS"), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. Please see Items 5 and 10 for a fuller discussion of these services and other important information.

AMOUNT OF CLIENT ASSETS MANAGED

As of December 31, 2021, Atlas managed $1,347,197,570 of client assets on a discretionary basis. Of these assets, $39,073,074 are REAL account assets. While REAL accounts are managed on a discretionary basis, they are not categorized as "regulatory assets under management" as they are reviewed and adjusted on a periodic basis.

Item 5 - Fees and Compensation

MANAGED PORTFOLIO SERVICES

Our fees for managed portfolio services are based on a percentage of client's assets under discretionary management with Atlas, and are set forth in our investment management agreement with the client. Our annual fee for advisory services, which may be as much as 1.75%, is subject to negotiation, may be discounted, and will vary from client to client based on a number of factors.

For certain clients, we charge an advisory fee for services provided with respect to the held-away accounts mentioned in Item 4 above, just as we do with client accounts that are not held away. The fees charged by us for managing held-away accounts are identical to the fees we charge for managing accounts that are not held away. We charge our current standard advisory fee schedule, to the DAF Sponsor, for assets we advise in certain donor-advised funds. Some legacy clients from firms we have merged with are subject to the fee agreement they signed when they were clients of such firm. The annual fee for those legacy accounts utilizing the REAL Service is 0.6%. Advisory fees are waived for those Atlas associates and family members opting to use Atlas for investment management services. Some clients have signed contracts that indicate Atlas will aggregate eligible account assets from eligible investment management agreements to qualify clients for a management fee breakpoint; only clients who have signed such contracts receive the benefit of householded fees.

Fees are billed in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value) of the client's account (including any cash and cash equivalents, and margin or other borrowing balances) at the end of the previous quarter. As it relates to cash and cash equivalents, at times your fee will exceed the money market yield. As it relates to margin, Atlas has a conflict of interest (because we earn a fee, we have a disincentive to encourage clients to trim or eliminate a margin balance). The client, at his or her discretion, may choose to pay management fees at the beginning of each quarter either through direct debit of the fees from his or her investment account or through direct billing. Either the client or Atlas may terminate an investment management agreement at any time with written notice. Any pre-paid, unearned fees will be pro-rated to the date of termination in accordance with the investment management agreement, and will be based upon the part thereof that the service was used during the quarter. Any such pre-paid, unearned fees will be refunded promptly.

FINANCIAL PLANNING SERVICES

Financial planning services are offered at a flat rate determined and agreed to by the client and Atlas given the scope of the engagement. Upon execution of a Letter of Engagement, the client may be required to pay a deposit (in such amount not to exceed $1,200) prior to commencement of services, with any such remainder of the fee due upon presentation of the plan. The client, at his or her discretion, may choose to pay the financial planning fee through direct debit of his or her investment account or through direct billing. Generally, the fees assessed for financial planning will be influenced and determined by the complexity and scope of specific services for which the client engages Atlas, and are generally in the range of $1,000-$5,000. Fees are subject to negotiation, may be discounted, and may also be more or less than the stated limits of this general range. Under certain legacy investment management agreements, general financial planning and related consulting services regarding non-investment matters to the extent requested are inclusive of the investment management fee agreed upon under those agreements. In addition, while we typically charge our wealth management clients for financial planning services, on an ad hoc basis, we offer continuing financial planning as an included service for certain wealth management clients.

Fees for financial counseling sessions for independent schools are based on the number of their employees taking advantage of the service. The fee for services rendered is $225 per person (or family), plus expenses. Schools will be billed for these fees after the services have been rendered, and are due within 30 days of Atlas' billing.

A client may terminate the planner-client relationship at any time. In that event, any unused portion of the financial planning fee will be refunded promptly to the client following receipt of written notice of termination.

EMPLOYEE BENEFIT PLAN 3(21) FIDUCIARY SERVICES

To engage Atlas for 3(21) Fiduciary Services, the plan sponsor will enter into an agreement with both Atlas and BSP (a "Fiduciary Services Agreement"). In consideration for the services rendered under this agreement, the plan will be charged an annual fee as a percentage of included assets (as such term is defined in the agreement) in accordance with the following schedule:

Included Assets	BSP's Annual Fee	Atlas' Annual Fee	Total Fee
On the first $1 million	0.20%	0.70%	0.90%
On the next $4 million	0.15%	0.45%	0.60%
On the next $5 million	0.08%	0.25%	0.33%
On amounts over $10 million	0.05%	0.15%	0.20%

Fees will be billed in advance on a quarterly basis. At the election of the plan sponsor, an invoice will be sent to the plan sponsor for remittance of the fees due, or to the plan custodian or recordkeeper, as applicable, for automatic deduction from the plan. Any of the plan sponsor, Atlas, or BSP may terminate the Fiduciary Services Agreement upon thirty (30) days advance written notice to the other parties. In the event of such termination prior to the end of a fee period, Atlas and BSP will be entitled to a fee pro-rated for the number of days in the fee period prior to the effective date of termination. Any unearned fees of Atlas or BSP, as the case may be, will be returned by Atlas or BSP, as the case may be, to the plan sponsor.

OTHER SERVICES

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Credit Solutions, LLC ("FTCS"). FTCS does not receive any compensation from such third-party institutions for serving our clients. Further information on this conflict of interest is available in Item 10 of this Brochure.

GENERAL INFORMATION ON FEES, SERVICES, AND COMPENSATION

Negotiability of Fees: Client fees are set forth in the investment management agreement for each client. Fees are subject to negotiation, may be discounted, and will vary from client to client based on a number of factors. Fees are discussed with each client and mutually agreed upon before execution of the investment management agreement. For those clients who are also associates of Atlas and their family members, investment management fees are waived.

Fee Calculation: Fees are not charged on the basis of a share of capital gains upon or capital appreciation of the funds of an advisory client. Fees are calculated depending upon the nature of services employed by the client and pursuant to the terms of the client's executed investment management agreement.

Termination of Advisory Relationships: An investment management agreement may be terminated at any time for any reason by either party upon receipt of proper written notice. Upon termination of any agreement, any prepaid, unearned fees will be refunded promptly. In the event of withdrawal of funds or the termination of any account, those fees, commissions, or other expenses associated with rebalancing or redeeming account holdings may be assessed to the client's account.

A Fiduciary Services Agreement may be terminated upon thirty (30) days advance written notice to all parties to such agreement. Any pre-paid, unearned fees will be returned promptly.

Other: From time to time, small portions of positions will be sold to bring the cash account balance to the level required for the automatic deduction of fees. It is understood that the payment of these fees will reduce the total investment return.

Additional fees and expenses: In addition to our fees, clients are responsible for the fees and expenses associated with the investment of their assets, such as brokerage commissions, transaction fees and expenses, and other expenses and charges imposed by broker-dealers and custodians who service client accounts (including but not limited to any custodian fees and account maintenance fees). Clients are additionally responsible for the fees and expenses of externally managed investments, such as third-party investment advisers, and of mutual funds and exchange traded funds. Certain donor-advised funds must pay an administrative fee to cover the cost of grant and contribution processing, verification of the charitable status of organizations, recordkeeping, and other services. Such fees, expenses, commissions and charges are exclusive of and in addition to our fee.

A client could invest in mutual funds or ETFs directly, without the services of Atlas. In that case, the client would not receive the benefit of initial and ongoing investment management services provided by Atlas which are designed, among other things, to determine which mutual funds or ETFs are appropriate to the client's financial condition and objectives. In addition, as a professional adviser, Atlas has access to share classes of certain mutual funds which are lower cost than mutual funds that are generally available to retail clients. Client should review all fees charged by the funds, the client's custodian, and clearing broker as well as the fees charged by Atlas to understand fully the total amount of fees to be paid by the client and to best evaluate the advisory services being provided.

Other Compensation: Atlas may receive compensation in the form of services and products through relationships with certain service providers. See Item 12 - *Brokerage Practices* for additional information.

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

Atlas does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). In addition, Atlas does not provide side-by-side management.

Item 7 - Types of Clients

Atlas provides investment advisory services for a variety of clients including individuals, high net worth individuals, corporate pension and profit-sharing plans, corporations and small-business entities, charitable institutions, foundations, and trusts. We require new clients to have a minimum of $100,000 to invest with us, though retain the discretion to waive the minimum under appropriate circumstances.

There is no minimum amount of assets required for engagement of Atlas' financial planning or employee benefit plan 3(21) fiduciary services.

Atlas, in its sole discretion, may reduce or waive its account minimums based upon certain criteria (including, but not limited to, such considerations as anticipated future additional assets, anticipated future earning capacity, dollar amounts to be managed, related accounts, and/or account composition).

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

Atlas typically invests client assets in accordance with investment strategies which hold mutual funds and ETFs. Some client accounts are individually managed, in which case they more often hold equity securities of individual companies, mutual funds, and ETFs.

Atlas has an Investment Committee, which meets regularly to monitor the efforts of the Chief Investment Officer ("CIO") and Atlas' Portfolio Management Group ("PMG"). Atlas' PMG conducts the investment research of the firm. Investments are evaluated independently, as well as in the context of clients' existing holdings and sector exposures. Atlas utilizes Morningstar and other online analysis platforms when evaluating investments.

Atlas' PMG conducts fundamental analysis on securities that are selected by the CIO for client portfolios. This analysis varies depending upon the particular security under evaluation. For mutual funds and ETFs, the analysis generally includes a review of the fund's management team, historical risk and return characteristics, exposure to sectors and individual issuers, fee structure, performance, and other relevant factors.

RISK OF LOSS

All investments are subject to the risk of loss which clients should be prepared to bear. All investments present the risk of loss of principal – the risk that the value of the securities (e.g., stocks, mutual funds, and ETFs), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the value when purchased, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

Investments such as those primarily used by Atlas for client portfolios (including, but not limited to, stocks, mutual funds, and ETFs) are not deposits in a bank and are not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency.

PRINCIPAL RISKS OF EQUITIES

Investing in equity securities generally involves becoming an owner in the issuer company and participating fully in its economic risks. The value of equity securities generally varies with the performance of the issuer and movements in the equity markets. As a result, clients may suffer losses if they invest in equity instruments of issuers whose performance diverges from the Firm's expectations or if equity markets generally move in a single direction. Markets periodically experience recessions, panics, crashes and other periods of volatility that can cause substantial losses in the equity securities in clients' investment portfolios.

PRINCIPAL INVESTMENT RISKS OF MUTUAL FUNDS AND ETFs

Mutual funds are professionally managed, collective investment companies that pool money from many investors and invest in various asset classes, including equities, fixed-income instruments (e.g., bonds), cash, and other assets. ETFs are investment funds traded on stock exchanges, much like stocks and other equities. An ETF may hold stocks, bonds, and/or other assets. Many ETFs track an index, such as the S&P 500.

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (*e.g.*, sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their *pro rata* NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

In addition to the risks discussed above, clients should consider the following risks:

- Financial Market Volatility. Financial markets are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Different sectors of the market can react differently to these developments.

- Foreign Exposure. Mutual funds and ETFs which are invested in foreign markets can be more volatile than the U.S. market due to increased risks of adverse issuer, political, regulatory, market, or economic developments and can perform differently from the U.S. market.
- Concentration Risk. A fund may be exposed to a particular sector, region, product, or industry that experiences volatility.
- Manager Risk. A fund manager's investment process, techniques, and analysis may not produce the desired results.
- Leverage. A fund or company in which a fund holds shares may utilize borrowed capital to augment the potential for return thereby concomitantly increasing exposure to debt.
- Layering of Expenses and Fees. Mutual funds and ETFs are subject to fees and expenses that are paid by an investor which are in addition to our advisory fees.
- Liquidity. Although typically associated with micro-cap and small-cap stocks or securities, liquidity risks can arise during times of market financial crisis. The risk arises when there is a lack of marketability for a fund's underlying security that cannot be bought or sold quickly enough to prevent or mitigate a loss.

More information regarding the specific risks associated with investment in a particular mutual fund is available in that mutual fund's prospectus.

CRYPTOCURRENCY INVESTMENT RISK

Cryptocurrency is a digital representation of value that functions as a medium of exchange, a unit of account, or a store of value, but it does not have legal tender status. Cryptocurrencies are sometimes exchanged for U.S. dollars or other world currencies, but they are not generally backed or supported by any government or central bank. They are more volatile than traditional currencies. Their value is speculative, given that they are not currently, widely accepted as a medium or exchange, is derived by market forces of supply and demand, and may be impacted by the continued willingness of market participants to exchange fiat currency for cryptocurrency. Cryptocurrencies are not covered by either FDIC or SIPC insurance.

Bitcoin, Ethereum and other cryptocurrencies are very speculative investments and involve a high degree of risk. An investment in cryptocurrency is not suitable for all investors, and may not generally be appropriate, particularly with funds drawn from retirement savings, student loans, mortgages, emergency funds, or funds set aside for other purposes. Investors must have the financial ability, sophistication/experience and willingness to bear the risks of an investment, and a potential total loss of their investment. An investment in cryptocurrency should be discretionary capital set aside strictly for speculative purposes. Fees and expenses associated with a cryptocurrency investment may be substantial.

In addition to the risks above, clients should consider the following risks:

- History of volatility. The exchange rate of cryptocurrency historically has been very volatile and the exchange rate of a cryptocurrency could drastically decline. For example, the exchange rate of Bitcoin has dropped more than 50% in a single day. Cryptocurrency-related investments may be affected by such volatility.

- Government regulation. Cryptocurrencies largely lack regulatory protections. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency. Legislative and regulatory changes or actions at the federal, state or international level may adversely affect the use, transfer, exchange, and value of cryptocurrency.
- Security concerns. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Cryptocurrency also may be stolen by hackers.
- New and developing. As a relatively recent invention, cryptocurrency and related investments do not have an established track record of operating history, performance, credibility and/or trust. Bitcoin and other cryptocurrencies are evolving. Cryptocurrencies use blockchain technology, which lacks standardization.

CYBERSECURITY RISK

The computer systems, networks, and devices used by Atlas and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons, and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

PANDEMIC RISK

The transmission of COVID and efforts to contain its spread have resulted in border closings and other travel restrictions and disruptions, market volatility, disruptions to business operations, supply chains and customer activity and quarantines. With widespread availability of vaccines, the U.S. Centers for Disease Control and Prevention has revised its guidance, travel restrictions have started to lift, and businesses have reopened. However, the COVID pandemic continues to evolve and the extent to which our investment strategies will be impacted will depend on various factors beyond our control, including the extent and duration of the impact on economies around the world and on the global securities and commodities markets. Volatility in the U.S. and global financial markets caused by the COVID pandemic may continue and could impact our firm's investment strategies.

Although currently there has been no significant impact, the COVID outbreak, and future pandemics, could negatively affect vendors on which our firm and clients rely and could disrupt the ability of such vendors to perform essential tasks.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to an evaluation of the integrity of the firm or its management. On July 24, 2015, Dion Money Management LLC (now known as Atlas Private Wealth Management, LLC) ("Dion") submitted an offer of settlement (the "Offer") to the U.S. Securities and Exchange Commission (the "SEC") in connection with an administrative proceeding pursuant to Sections 203(e) and 203(k) of the Investment Advisers Act of 1940 (the "Advisers Act"). The Offer was presented to the SEC, and the SEC determined to accept it. Solely for the purpose of proceedings brought by or on behalf of the SEC, or to which the SEC is a party, Dion agreed to consent to an order imposing remedial sanctions and a cease-and-desist order (the "Order") without admitting or denying the matters set forth therein (other than those relating to the jurisdiction of the SEC over it and the subject matter of the action). The Order resolved the SEC's allegations that Dion failed to disclose to clients the terms of certain compensation arrangements whereby Dion received payments from third parties that were calculated based on client assets invested in particular mutual funds. In filings with the SEC, Dion disclosed the existence of the arrangements and the possibility that the arrangements could pose conflicts of interest for the adviser in the provision of investment advice to clients; however, Dion did not describe the interplay between the different arrangements, either in its filings or otherwise to clients. The SEC alleged that Dion thus understated the maximum payment rate under the multiple arrangements, and did not disclose the possibility of receiving payments from multiple parties based on the same client assets. By failing to disclose its conflicts of interest completely and accurately, the SEC alleged that Dion violated Section 206(2) of the Advisers Act. The SEC also alleged that Dion violated Section 207 of the Advisers Act by virtue of certain omissions of material facts from its SEC filings concerning the compensation arrangements. The Order requires Dion to cease and desist from committing or causing violations of the securities laws identified above; pay a $50,000 civil monetary penalty; amend its Form ADV to make additional disclosures regarding the compensation arrangements described above; and notify its advisory clients of the Order. Dion paid the penalty on August 3, 2015, and the notices were mailed on August 13, 2015, and August 20, 2015.

Item 10 - Other Financial Industry Activities and Affiliations

FINANCIAL INDUSTRY AFFILIATIONS

Atlas is part of the Focus Financial Partners, LLC ("Focus LLC") partnership. As such, Atlas is a wholly-owned subsidiary of Connectus Group, LLC, which is a wholly-owned subsidiary of Focus Operating, LLC ("Focus Operating"), which is a wholly-owned subsidiary of Focus LLC. Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, and other financial services firms (the "Focus Partners"), most of which provide wealth management, benefits consulting, and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs. Additional information about Focus LLC and Focus LLC affiliates can be found on each respective investment adviser's Form ADV which is available on the SEC's website at www.adviserinfo.sec.gov.

As discussed above, plan sponsors who engage us for services to participant-directed retirement plans will enter into an investment advisory and management agreement among the plan sponsor, Atlas, and BSP, an Atlas affiliate. This arrangement poses a potential conflict of interest in that, when providing 3(21) Fiduciary Services to clients, Atlas has a fiduciary duty to recommend appropriate and qualified 3(38) investment managers in the clients' best interests, and clients who engage BSP will increase the fees our affiliate receives. Because Atlas and BSP are under common control, our parent company benefits when Atlas recommends that clients hire BSP as a 3(38) investment manager. We believe this conflict is mitigated because of the following: (1) this arrangement is based on our judgment that our clients' engagement of BSP is in the best interests of our clients; (2) clients engage BSP on a nondiscretionary basis; (3) Atlas will recommend that plan sponsors terminate BSP if BSP's services become unsatisfactory in Atlas' judgment; and (4) Atlas has fully and fairly disclosed the material facts regarding this relationship.

As stated earlier in this Brochure, Atlas is a wholly-owned subsidiary of Focus. Focus is also one of several minority investors in SmartAsset, which seeks to match prospective advisory clients with investment advisers. Focus has one director on SmartAsset's board as well as a board observer. Atlas' payment of a fee to SmartAsset benefits SmartAsset's investors, including Focus, Atlas' parent company.

FOCUS TREASURY & CREDIT SOLUTIONS

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Credit Solutions, LLC ("FTCS"), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. These third-party financial institutions are banks and non-banks (the "Network Institutions") that offer credit and cash management solutions to our clients. Certain other unaffiliated third parties provide administrative and settlement services to facilitate FTCS's cash management solutions. FTCS acts as an intermediary to facilitate our clients' access to these credit and cash management solutions.

Neither we nor FTCS receives any compensation from the Network Institutions or any other third parties for providing credit or cash management solutions to our clients. For services provided by FTCS to clients of other Focus firms, FTCS receives a portion of the revenue earned by the Network Institutions, and such compensation to FTCS is also revenue for our common parent company, Focus Financial Partners, LLC. However, this compensation to FTCS does not come from credit or cash management solutions provided to any of our clients. The volume generated by our clients' transactions does benefit FTCS and Focus in attracting, retaining, and negotiating with Network Institutions. We mitigate this conflict by: (1) fully and fairly disclosing the material facts concerning the above arrangements to our clients, including in this Brochure; and (2) offering FTCS solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services. Additionally, we note that clients who use FTCS's services will receive product-specific disclosure from the Network Institutions and other unaffiliated third-party intermediaries that provide services to our clients.

We have an additional conflict of interest when we recommend FTCS to provide credit solutions to our clients because our interest in continuing to receive investment advisory fees from client accounts gives us a financial incentive to recommend that clients borrow money rather than liquidating some or all of the assets we manage.

CREDIT SOLUTIONS FROM FTCS

For FTCS credit solutions, the interest rate of the loan is ultimately determined by the lender, although in some circumstances FTCS may have the ability to influence the lender to lower the interest rate of the loan. The final rate may be higher or lower than the prevailing market rate. We can offer no assurances that the rates offered to you by the lender are the lowest possible rates available in the marketplace.

Clients retain the right to pledge assets in accounts generally, subject to any restrictions imposed by clients' custodians. While the FTCS program facilitates secured loans through Network Institutions, clients are free instead to work directly with institutions outside the FTCS program. Because of the limited number of participating Network Institutions, clients may be limited in their ability to obtain as favorable loan terms as if the client were to work directly with other banks to negotiate loan terms or obtain other financial arrangements.

Clients should also understand that pledging assets in an account to secure a loan involves additional risk and restrictions. A Network Institution has the authority to liquidate all or part of the pledged securities at any time, without prior notice to clients and without their consent, to maintain required collateral levels. The Network Institution also has the right to call client loans and require repayment within a short period of time; if the client cannot repay the loan within the specified time period, the Network Institution will have the right to force the sale of pledged assets to repay those loans. Selling assets to maintain collateral levels or calling loans may result in asset sales and realized losses in a declining market, leading to the permanent loss of capital. These sales also may have adverse tax consequences. Interest payments and any other loan-related fees are borne by clients and are in addition to the advisory fees that clients pay us for managing assets, including assets that are pledged as collateral. The returns on pledged assets may be less than the account fees and interest paid by the account. Clients should consider carefully and skeptically any recommendation to pursue a more aggressive investment strategy in order to support the cost of borrowing, particularly the risks and costs of any such strategy. More generally, before borrowing funds, a client should carefully review the loan agreement, loan application, and other forms and determine that the loan is consistent with the client's long-term financial goals and presents risks consistent with the client's financial circumstances and risk tolerance.

CASH MANAGEMENT SOLUTIONS FROM FTCS

For FTCS cash management solutions, as stated above, certain third-party intermediaries provide administrative and settlement services in connection with the program. Those intermediaries each charge a fixed basis point fee on total deposits in the program. Before any interest is paid into client accounts, the Network Institutions and certain unaffiliated third-party service providers take their fees out, and the net interest is then credited to clients' accounts. Engaging FTCS, the Network Institutions, and these other intermediaries to provide cash management solutions does not alter the manner in which we treat cash for billing purposes.

Clients should understand that in rare circumstances, depending on interest rates and other economic and market factors, the yields on cash management solutions could be lower than the aggregate fees and expenses charged by the Network Institutions, the intermediaries referenced above, and us. Consequently, in these rare circumstances, a client could experience a negative overall investment return with respect to those cash investments. Nonetheless, it might still be reasonable for a client to participate in the FTCS cash management program if the client prefers to hold cash at the Network Institutions rather than at other financial institutions (e.g., to take advantage of FDIC insurance).

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

Atlas has adopted a Code of Ethics in accordance with SEC Rule 204A-1 for all associates of the firm describing its standard of business conduct and how it fulfills its fiduciary duty to its clients. The Code of Ethics includes provisions relative to matters including, but not limited to, confidentiality of client information, prohibitions against insider trading and spreading unverified information, restrictions on the acceptance of significant gifts, reporting of certain gifts and business entertainment items, review of certain outside business activities and personal securities trading procedures. All officers and associates must acknowledge the terms of the Code of Ethics upon initial employment and on an annual basis thereafter.

Atlas officers and associates may buy or sell securities for their personal accounts that are identical to those selected by Atlas for client accounts. Additionally, any related person(s) may have an interest or position in a certain security or securities which may also be selected for client accounts. To address potential conflicts of interest involving personal trades, Atlas has adopted compliance policies and procedures in its Code of Conduct and Compliance Manual, including its Code of Ethics. The Code of Ethics is designed such that the personal securities transactions, activities, and interests of the associates of Atlas will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing associates to invest for their own accounts. Atlas' Code of Conduct and Compliance Manual, including its Code of Ethics requires its associates to:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospects, their employer, and their fellow associates
- Adhere to the highest standards to with respect to any actual or potential conflicts of interest
- Place client interests ahead of those of Atlas

- Engage in personal investing in full compliance with Atlas' Code of Ethics and extant policies and procedures
- Avoid taking advantage of one's professional position
- Comply with all applicable federal securities laws
- Pre-clear certain personal securities transactions
- Provide Atlas with a report containing a complete list of certain holdings (both upon commencement of employment and annually thereafter) over which such associates have a direct or indirect beneficial ownership, along with quarterly transaction reports for personal securities transactions

Nonetheless, because the Code of Ethics in some circumstances would permit associates to invest in the same securities as clients, there is a possibility that associates might benefit from market activity by a client in a security held by an associate. Neither we nor any of our related persons will intentionally profit through any timing of securities owned in or transacted for Client accounts.

A copy of Atlas' Code of Ethics will be provided to any client or prospective client upon request by calling (800) 432-7447.

It is Atlas' policy that the firm will not effect any principal or agency cross securities transactions for client accounts. Atlas 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 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

BROKERAGE RECOMMENDATIONS

Atlas recommends Fidelity Investments ("Fidelity") and Charles Schwab & Company ("Schwab") to clients in need of brokerage and custodial services. Through their respective institutional customer programs, these custodians offer various services, including custody of securities, trade execution, and clearance and settlement of transactions. Atlas' clients are charged directly by these firms for these services. In return, Atlas and its clients receive benefits that they would not otherwise receive. Both Fidelity and Schwab are independent, unaffiliated SEC-registered broker-dealers.

In evaluating custodians for recommendation, Atlas seeks those who will hold client assets and execute transactions that are advantageous when compared with other available custodians and their services. Atlas considers a wide range of factors, including, among others, the combination of transaction execution services along with asset custody services; the ability to execute, clear, and settle trades; the capability to facilitate transfers and payments to and from accounts; the breadth of investment products available; the availability of investment research and tools to assist Atlas in making investment decisions; the quality of services; the competitiveness of the price of those services; the reputation, financial strength, and stability of the provider; their prior service to Atlas and its clients; and the availability of other products and services that benefit Atlas and its clients. Although Atlas is subject to a duty to obtain best execution with regard to the brokerage transactions Atlas directs on behalf of clients, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where Atlas determines, in good faith, that the transaction fee is reasonable. In seeking best execution, 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. Accordingly, although Atlas seeks competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Atlas' investment advisory fee.

While Atlas recommends the use of these custodians, it is at the client's discretion to opt to do so. Should a client direct Atlas to use a different broker or dealer, Atlas will not have the ability to obtain volume discounts, best execution may not be achieved, and clients may pay more for commissions than the commissions charged by the broker-dealer custodians Atlas recommends. In addition, while we work to execute client orders as quickly as possible, the technology available to us through other broker-dealers could cause delays in order execution as compared to the time required to execute trades for accounts held at Fidelity or Schwab.

In those instances where the client instructs Atlas to purchase or sell certain securities, and an opportunity for aggregation exists, Atlas will generally aggregate transactions when it believes that aggregation is in the client's best interests and is feasible. Aggregated orders will be allocated among clients in a manner that is fair and equitable, with transaction costs shared among participating clients.

ADDITIONAL BENEFITS FROM AGREEMENTS WITH SERVICE PROVIDERS

Both Fidelity and Schwab (together, the "Custodians") provide Atlas with certain benefits and services based upon the amount of client assets in accounts at the Custodians. These benefits include access to the Custodians' institutional trading and operations services, including research, and other products and services. These products and services may benefit Atlas directly without necessarily benefitting individual client accounts, either directly or indirectly.

Other products and services assist Atlas in managing and administering clients' accounts. These include the provision of software and other technologies to access client account data (such as trade confirmations and account statements); facilitation of trade execution (and allocation of aggregated trade orders for multiple client accounts); provision of pricing information and other market data; facilitation of payment of Atlas' fees from its clients' accounts; and assistance with back-office support, recordkeeping, and client reporting. Many of these products and services may be used to service all Atlas' accounts, including those accounts not maintained at the Custodians.

These products and services may not benefit all of Atlas' client accounts equally and may not benefit certain client accounts at all.

The Custodians may also provide Atlas with other services intended to help Atlas manage and further develop its business enterprise. These services may include consulting, publications, and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. They may also provide other benefits such as educational conferences and events. These services may be provided by the Custodians themselves; in other cases, they may arrange for third-party vendors to provide the services to Atlas. Additionally, the Custodians may discount or waive fees they would otherwise charge Atlas for some of these services or pay all or a part of the fees of a third party providing these services to Atlas.

Atlas does not make a commitment to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other products as a result of the above arrangements. However, Atlas' receipt of these products and services from the Custodians creates a conflict of interest as these benefits may influence Atlas' decision to recommend them over other service providers that do not furnish similar support, services, or software to Atlas. Atlas believes that the foregoing products and services are customary and typical of products and services custodians provide to investment advisers similar to Atlas, and further believes that the retention of Custodians is in the best interest of Atlas' clients.

Item 13 - Review of Accounts

Specific mutual funds, ETFs and individual securities common to client portfolios are monitored on an on-going basis.

Atlas' investment personnel hold both formal and informal meetings to discuss investment ideas, economic developments, current events, investment strategies, issues related to portfolio holdings, etc.

The Investment Committee reviews asset allocation strategies periodically to confirm they remain consistent with their defined objective and risk tolerances. Atlas' PMG reviews the performance of mutual funds, ETFs and individual securities held in individually managed accounts and the results are communicated to and discussed with the Investment Committee.

Client portfolios are reviewed at least annually by the client's Wealth Management Advisor to confirm that overall allocations and individual holdings are consistent with the client's investment objectives.

REPORTS OF ACCOUNTS

Custodians send account statements directly to clients on a regular basis. In addition to the statements and confirmations of transactions that clients receive from their designated custodian, Atlas provides clients with periodic written reports detailing their portfolio's financial profile and performance data. These reports include the current value and summary information regarding portfolio activity, performance, allocation, and investments.

Clients should carefully review their custodian's statements and compare them with those account reports they receive from Atlas. Atlas encourages clients to request face-to-face or telephone meetings with their Wealth Management Advisor to review progress in pursuing investment goals and to consider resetting goals.

Item 14 - Client Referrals and Other Compensation

CLIENT REFERRALS

Atlas has arrangements in place with certain third parties, called promoters, under which such promoters refer clients to us in exchange for a fee. Such compensation creates an incentive for the promoters to refer clients to us, which is a conflict of interest for the promoters. Rule 206(4)-1 of the Advisers Act addresses this conflict of interest by, among other things, requiring disclosure of whether the promoter is a client or a non-client and a description of the material conflicts of interest and material terms of the compensation arrangement with the promoter. Accordingly, we require promoters to disclose to referred clients, in writing: whether the promoter is a client or a non-client; that the promoter will be compensated for the referral; the material conflicts of interest arising from the relationship and/or compensation arrangement; and the material terms of the compensation arrangement, including a description of the compensation to be provided for the referral.

We pay a fee to participate in an online matching program with one such promoter, SmartAsset, which seeks to match prospective advisory clients who have expressed an interest in finding an investment adviser with investment advisory firms. The adviser matching program provides the name and contact information of such persons to the advisory firms as potential leads. For our participation in the program, we pay a flat fee of $206 per lead ("lead fee") for prospective clients with investible assets of more than $1 million. The lead fee we have agreed to pay gives SmartAsset a financial incentive to match prospective clients to our firm. The lead fee is payable regardless of whether the prospect becomes our advisory client.

OTHER COMPENSATION

On occasion, certain associates of Atlas attend meetings sponsored by mutual fund groups or service providers that provide training or education, and in some circumstances the meeting fees, lodging, and/or travel may be paid by the sponsor. The participation of Atlas associates is not preconditioned on the assets placed with any specific sponsor or revenue generated by such asset placement. This could be deemed a conflict as the marketing and education activities conducted and the access granted at such meetings could cause Atlas to focus on those sponsors in the course of its duties. Atlas addresses this concern by reviewing proposed sponsor products/services at the Investment Committee and/or senior management level, as appropriate, to ensure that such selections are suitable and selected for appropriate reasons.

Atlas' parent company is Focus LLC. From time to time, Focus LLC holds partnership meetings and other industry and best-practices conferences, which typically include Atlas, other Focus firms, and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including Atlas. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors, and other third-party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including Atlas. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause Atlas to focus on those conference sponsors in the course of its duties. Focus LLC attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including Atlas. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement.

The following entities have provided conference sponsorship to Focus from January 1, 2021 to March 1, 2022:

Charles Schwab & Co., Inc.

You can access a more recently updated list of recent conference sponsors on Focus' website through the following link:

https://focusfinancialpartners.com/conference-sponsors/

See Item 12 - *Brokerage Practices* for additional information.

Item 15 - Custody

Client assets are held at unaffiliated, qualified custodians. While Atlas does not hold actual physical custody of these assets, the SEC deems Atlas to have legal custody over client assets under certain circumstances, such as when clients authorize Atlas through standing instructions to instruct qualified custodians to transfer assets to third parties and when clients give Atlas password or PIN access to accounts where Atlas is able to debit or withdraw client funds. For certain of these accounts, Atlas is required under the Custody Rule to engage an independent public accountant on an annual basis to verify by actual examination those client funds and securities.

Clients will receive statements on a regular basis from the broker-dealer, bank, or other unaffiliated, qualified custodian that holds and maintains client investment assets. Clients should review such custodial statements carefully and compare such official custodial records to account reports that Atlas provides. Those account reports provided by Atlas may vary from custodial statements based upon accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

Atlas receives authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold, as well as the timing of such transactions, without prior consent from the client ("discretionary authority"). Such discretionary authority is conferred upon Atlas under the terms of the investment management agreement, and must be exercised in a manner consistent with the investment objectives for the client account as well any investment policies, limitations, and restrictions applicable to the account.

Clients on occasion may prefer to restrict the securities in which Atlas may invest their assets. For example, a client may not want to hold securities of specific companies, companies engaged in certain businesses or activities, specific mutual funds, types of funds (e.g., emerging market), or fund families. Atlas will review and evaluate any such request for reasonableness, and if accepted, will restrict trading in those accounts so that the restriction is observed.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, Atlas does not have authority to and does not vote proxies on behalf of advisory clients. Clients retain this authority for receiving and voting proxies for those securities held in their portfolios. Any such proxies will be received by the client directly from their custodian. Should a client have questions regarding a particular proxy solicitation, they may contact their Atlas Wealth Management Advisor at (800) 432-7447 for consultation.

Item 18 - Financial Information

Registered investment advisers, such as Atlas, are required to provide certain financial information or disclosures about their financial condition. Atlas has no financial commitment impairing its ability to meet contractual commitments to clients, and has not been the subject of a bankruptcy proceeding.