Kith & Kin Wealth

Firm Brochure — Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Kith & Kin Wealth. If you have any questions about the contents of this brochure, please contact us at (262) 490-4722 or by email at Anthony@kithkinwealth.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 Kith & Kin Wealth is also available on the SEC's website at www.adviserinfo.sec.gov. Kith & Kin Wealth's CRD number is: 341864.

Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 7/31/2026

Item 2: Material Changes

Since the previous version of this brochure (dated 3/31/2026), Kith & Kin Wealth has made the following material changes:

Item 5: The minimum annual fee was reduced from $4,250 to $4,200 per household. Language was added clarifying that advisory fees are calculated on a tiered (marginal) basis producing a blended effective rate, and describing how related accounts are aggregated ("householded") for purposes of applying fee tiers. Disclosure was added regarding the firm's discretion to waive or reduce fees, including for family members of existing clients and persons related to the firm's management, and the resulting conflict of interest. Termination and refund language was revised to reflect that all fees are billed monthly in arrears and no fees are collected in advance. A policy addressing minimum-fee treatment for households experiencing significant asset declines was added.

Item 7: Clarified that while KKW imposes no minimum account size, the minimum annual fee described in Item 5 applies.

Item 8: Revised to describe the firm's actual investment approach, including factor-based portfolio construction, direct indexing, and automated tax-loss harvesting (including wash-sale risk), and to add digital asset exposure. Descriptions of asset classes and strategies the firm does not use were removed.

Items 10 and 11: Added disclosure of the investment adviser representative's unpaid role supporting GNA Capital LLC, a family-owned investment entity beneficially owned by advisory clients who are family members of the representative, including the associated conflict of interest and how it is addressed.

Item 4: Added disclosure regarding the firm's use of technology tools incorporating artificial intelligence; updated the firm's assets under management.

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Kith & Kin Wealth (hereinafter "KKW") is a Limited Liability Company organized in the State of Ohio. The firm was formed in March 2026, and the principal owner is Anthony Biasiotta.

B. Types of Advisory Services

Portfolio Management Services

KKW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. KKW creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

KKW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. KKW will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

KKW seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of KKW's economic, investment or other financial interests. To meet its fiduciary obligations, KKW attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, KKW's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is KKW's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; estate planning; and debt/credit planning.

Financial planning is inclusive of the portfolio management services mentioned above.

Pension Consulting Services

KKW offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various asset classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Services Limited to Specific Types of Investments

KKW generally limits its investment advice to mutual funds, exchange-traded funds (ETFs), individual equities (including equity portfolios implemented through direct indexing), fixed income securities, treasury inflation protected/inflation linked bonds, non-U.S. securities (generally obtained through funds and ETFs), and digital asset exposure (currently limited to Bitcoin, generally obtained through exchange-traded products). KKW may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

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

Use of Technology and Artificial Intelligence

KKW uses third-party software tools, including tools that incorporate artificial intelligence ("AI"), to support the operation of its business. These uses include meeting note-taking and summarization, document drafting and preparation, research support, and administrative workflows. AI tools do not make investment decisions, execute transactions, or provide advice to clients. All investment recommendations, advice, and compliance determinations are made and reviewed by the firm's investment adviser representative. KKW reviews AI-assisted output for accuracy before it is used or relied upon and conducts due diligence on its technology vendors, including with respect to data privacy and security practices.

C. Client Tailored Services and Client Imposed Restrictions

KKW will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by KKW on behalf of the client. KKW utilizes a comprehensive financial planning process that extends beyond basic risk tolerance. KKW tailors our advisory services by analyzing a client's full financial ecosystem. KKW reviews individual tax brackets to determine appropriate asset location (Taxable vs. Tax-Deferred) and implements tax-loss harvesting where appropriate. For HNW families, KKW reviews existing estate plans and coordinates with outside counsel to ensure assets are structured for the family's legacy goals. KKW buckets assets based on time horizons (e.g., short-term home purchase, mid-term education funding, and long-term retirement). KKW may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent KKW from properly servicing the client account, or if the restrictions would require KKW to deviate from its standard suite of services, KKW reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. KKW does not participate in wrap fee programs.

E. Assets Under Management

KKW has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$20,242,500	$0	July 2026

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fee
$1 – $1,500,000	1.00%
$1,500,001 – $3,000,000	0.90%
$3,000,001 – $5,000,000	0.80%
$5,000,001 – $10,000,000	0.75%
$10,000,001 – $15,000,000	0.70%
$15,000,001 – $25,000,000	0.65%
$25,000,001 and up	0.55%

Advisory fees are calculated on a tiered (marginal) basis. Each rate in the schedule above applies only to the portion of household assets that falls within that tier, and the total annual fee is the sum of the amounts calculated for each tier. The effective annual rate is therefore a blended rate that declines as household assets increase; fees are not charged at a single flat rate on the entire account value.

For purposes of determining which fee tiers apply, KKW aggregates ("households") the assets of related client accounts — generally accounts belonging to spouses or domestic partners, their dependent children, and related trusts and entities — so that clients receive the benefit of fee breakpoints across the household relationship.

KKW imposes a minimum annual fee of $4,200 per household, billed monthly in arrears ($350 per month). The minimum fee may cause households with smaller asset levels to pay a higher effective advisory rate than the tiered schedule alone would produce. KKW may, in its discretion, waive or reduce the minimum fee or negotiate reduced advisory fees, including for family members of existing clients and for persons related to the firm's management; any such waiver or reduction is documented in the client's file at the time it is granted. Because certain related persons of KKW pay reduced fees, similarly situated clients may pay different fees for the same services. This presents a conflict of interest, which KKW addresses through this disclosure and through consistent application of its standard fee schedule to unrelated clients.

If a sustained decline in household assets would cause the minimum fee to produce an effective advisory rate that KKW determines to be unreasonable, KKW will review the relationship and either waive or reduce the minimum fee, convert the engagement to a fixed planning fee, or terminate the engagement, with the determination documented in the client's file. The fees will not exceed any limit imposed by any regulatory agency.

KKW uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Because KKW bills all fees monthly in arrears and does not collect any fees in advance, no prepaid fees exist to be refunded upon termination. Clients may terminate the Investment Advisory Contract at any time, immediately upon written notice. Upon termination, fees are prorated for the number of days during the final billing period in which services were provided.

Pension Consulting Services Fees

Total Assets Under Management	Annual Fee
$1 – $1,500,000	1.00%
$1,500,001 – $3,000,000	0.90%
$3,000,001 – $5,000,000	0.80%
$5,000,001 – $10,000,000	0.75%
$10,000,001 – $15,000,000	0.70%
$15,000,001 – $25,000,000	0.65%
$25,000,001 and up	0.55%

Pension consulting fees are calculated on the same tiered (marginal) basis described above for portfolio management fees.

KKW uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Because KKW bills all fees monthly in arrears and does not collect any fees in advance, no prepaid fees exist to be refunded upon termination. Clients may terminate the pension consulting agreement at any time, immediately upon written notice. Upon termination, fees are prorated for the number of days during the final billing period in which services were provided.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis, or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees, which are separate and distinct from the advisory fees charged by KKW. These third-party fees include, but are not limited to: custodial and platform fees charged by the client's custodian, Altruist Financial, LLC (including Altruist's platform/program fee and charges for optional services such as fixed income, model marketplace, mutual fund transactions, and paper document delivery); fees for tax-loss harvesting and direct indexing services, which KKW provides using Distill; brokerage commissions and other transaction costs; and the internal management fees and expenses (such as expense ratios) embedded in any mutual funds, exchange-traded funds, or other pooled investment vehicles held in a client's account. Where a client account uses Altruist's platform-based or direct-indexing services, these fees are layered on top of, and in addition to, KKW's advisory fee; clients should review the applicable Altruist fee schedule for current amounts. KKW does not receive any portion of these third-party fees. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

KKW collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither KKW nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

KKW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

KKW generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals

KKW does not impose a minimum account size or minimum asset level as a condition of establishing a client relationship. KKW does, however, impose a minimum annual fee of $4,200 per household, as described in Item 5, which may be waived at KKW's discretion. Because of the minimum fee, households with smaller asset levels may pay a higher effective advisory rate than the tiered fee schedule alone would produce.

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

Methods of Analysis and Investment Strategies

Methods of Analysis

KKW's methods of analysis include quantitative, factor-based analysis and Modern Portfolio Theory.

Factor-based (quantitative) analysis constructs and evaluates portfolios based on measurable security characteristics ("factors") that academic and practitioner research has associated with differences in long-term risk and return — such as company size, relative price (value), profitability/quality, and momentum. KKW uses factor analysis to build broadly diversified equity portfolios that tilt toward targeted factors rather than to select individual securities based on company-specific forecasts.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

Investment Strategies

KKW uses long-term, tax-managed investing. Portfolios are constructed for long holding periods and are managed with attention to after-tax outcomes, including asset location across taxable and tax-advantaged accounts.

Direct indexing and tax-loss harvesting. For appropriate taxable accounts, KKW implements factor-tilted equity portfolios through direct indexing — holding a representative sample of individual securities designed to track a target index or factor profile — using Distill, a third-party direct indexing and tax-loss harvesting provider available through the firm's custodial platform. Direct indexing accounts employ automated tax-loss harvesting, which periodically sells securities at a loss and replaces them with similar (but not substantially identical) securities in order to realize capital losses that may offset gains or income for tax purposes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Factor-based (quantitative) analysis relies on historical relationships between security characteristics and returns that may weaken, disappear, or reverse in the future. Targeted factors can underperform the broad market for extended periods — years or longer — and factor-tilted portfolios will behave differently than broad market indices. Quantitative models may also perform differently than expected as a result of the factors used, the weight placed on each factor, changes from the factors' historical behavior, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Diversification and optimization based on historical or expected correlations may fail to protect a portfolio when correlations shift, particularly during periods of market stress.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Direct indexing and tax-loss harvesting risks. Tax-loss harvesting is subject to the wash-sale rule, which defers or disallows a realized loss when the same or a substantially identical security is purchased within 30 days before or after the sale — including purchases in other accounts in the client's household or in accounts held away from the firm that KKW does not manage or monitor. Clients trading in outside accounts may inadvertently trigger wash sales that reduce or eliminate the intended tax benefit. Harvesting activity replaces sold securities with similar but not identical securities, which creates tracking error: the portfolio's return may differ, positively or negatively, from the target index or factor profile. Tax-loss harvesting generally defers rather than eliminates tax; harvested losses reduce cost basis, which may increase capital gains recognized in the future. The value of tax-loss harvesting depends on each client's individual tax situation and may be limited or of no value for some clients. KKW does not provide tax advice; clients should consult their tax professional.

Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments. Direct indexing accounts hold individual equity securities and are therefore subject to the risks of each security held, although broad diversification within the account is designed to limit the impact of any single security.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, and fixed income investments (as applicable). ETFs that target a small universe of securities, such as a specific region, market sector, or factor, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Digital Assets: Certain client portfolios include exposure to digital assets, currently limited to Bitcoin and generally obtained through exchange-traded products rather than direct ownership. Digital assets are highly speculative and extremely volatile, and may lose most or all of their value. Digital asset prices are influenced by factors that are difficult to evaluate, including shifting regulatory treatment in the United States and abroad, technological developments, security failures or cyberattacks affecting trading venues or custodians, market manipulation, and changes in speculative sentiment. Digital assets lack the earnings, cash flows, or contractual payment streams that support the valuation of traditional securities. Exchange-traded products holding digital assets are additionally subject to product-level risks, including fees and expenses, tracking differences, and the potential for shares to trade at a premium or discount to the value of the underlying assets. Clients should be prepared for the possibility of large, rapid losses on any digital asset exposure.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available. KKW generally obtains non-U.S. exposure through funds and ETFs.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither KKW nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither KKW nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Anthony Biasiotta, KKW's Managing Member and investment adviser representative, provides unpaid administrative, organizational, and analytical support to GNA Capital LLC, a family-owned pass-through investment entity beneficially owned by advisory clients of KKW who are family members of Mr. Biasiotta. Mr. Biasiotta holds no ownership interest in GNA Capital LLC, receives no compensation for this activity, and performs it outside of KKW's business hours. GNA Capital LLC is not managed by Mr. Biasiotta; its manager of record is a member of the entity.

GNA Capital LLC's brokerage account is managed by KKW as a discretionary advisory account under an advisory agreement and is aggregated with the beneficial owners' family household for fee-billing purposes, as described in Item 5. GNA Capital LLC's private equity and venture capital investment activities are outside the scope of KKW's advisory services; KKW does not advise on, recommend, or receive compensation in connection with those investments.

This family and service relationship presents a conflict of interest: Mr. Biasiotta has personal and familial incentives with respect to GNA Capital LLC and its beneficial owners that other clients do not share. KKW addresses this conflict through this disclosure, through its Code of Ethics, and by treating the GNA Capital LLC advisory account under the same fiduciary standards, trading practices, and fee schedule applicable to the family household.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

KKW does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

KKW has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. KKW's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

KKW does not recommend that clients buy or sell any security in which KKW or a related person to KKW has a material financial interest. As described in Item 10, KKW manages the brokerage account of GNA Capital LLC, an entity beneficially owned by family members of KKW's investment adviser representative who are also advisory clients. Individual securities held in that account are selected as part of the advisory relationship with that household; KKW does not recommend those securities to other clients on the basis of any interest of its related persons.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of KKW may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of KKW to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. KKW will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of KKW may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of KKW to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, KKW will never engage in trading that operates to the client's disadvantage if representatives of KKW buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on KKW's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and KKW may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in KKW's research efforts. KKW will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

KKW will require clients to use Altruist Financial.

1. Research and Other Soft-Dollar Benefits

While KKW has no formal soft dollars program in which soft dollars are used to pay for third party services, KKW may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). KKW may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and KKW does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. KKW benefits by not having to produce or pay for the research, products or services, and KKW will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that KKW's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

KKW receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

KKW will require that clients use a specific broker-dealer to execute transactions. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of KKW. By directing brokerage, KKW may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require or allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If KKW buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, KKW would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. KKW would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for KKW's advisory services provided on an ongoing basis are reviewed at least quarterly by Anthony Biasiotta, Managing Member and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at KKW are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of KKW's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits as described in Item 12 above, KKW does not receive any economic benefit, directly or indirectly from any third party for advice rendered to KKW's clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

KKW does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, KKW will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive quarterly account statements from the custodian and, in jurisdictions that require it, monthly billing invoices from KKW. Clients are urged to compare the account statements they received from custodian with any statements they received from KKW.

Item 16: Investment Discretion

KKW provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, KKW generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, KKW's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to KKW).

Item 17: Voting Client Securities (Proxy Voting)

KKW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

KKW neither requires nor solicits prepayment of more than $500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither KKW nor its management has any financial condition that is likely to reasonably impair KKW's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

KKW has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

KKW currently has only one management person: Anthony Stanley Biasiotta. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

KKW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.