

Introduction

Abundance Wealth Counselors, LLC ("Abundance") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Abundance provides private wealth management services in a family office setting to its clients on an ongoing basis. Abundance manages client investments on a discretionary basis. In addition, the firm has power of attorney on client assets under management, allowing for assets to be transferred out of and between accounts.

Abundance will also provide ancillary services to clients and their families in areas such as estate administration, asset distribution, loan & trust administration, and private banking services. Additionally, Abundance will provide advice on, and/or offer to clients, investment opportunities in private investment offerings where appropriate for the client and consistent with the client's goals and objectives.

Abundance also implements and advises on the investments of retirement plans for both organizations and individuals. Abundance can act in a fiduciary or a non-fiduciary capacity when providing services to retirement plans, can manage the investment of the assets on a discretionary or non-discretionary basis, can provide advice on investment choices when not managing the investment, and can provide both participant and plan-level services and advice.

Abundance requires a minimum total client balance of \$1 Million across all account managed by Abundance. This requirement may be waived upon review of the client's individual circumstances and relationship to Abundance or its clients.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients, which can be found by [CLICKING HERE](#).

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

What fees will I pay?

Asset Management fees range from 0.60% to 1.00% per annum depending on the amount of assets under management. The Abundance Enhanced Fixed Income Strategy and 100% Fixed Income Portfolios have annual management fees of 0.40%. The fee is charged as a percentage of assets. Abundance excludes certain assets when calculating management fees and will identify such assets and inform the client when this situation applies. The assets excluded will not be taken into consideration when determining the management fee tier. The asset management fee is exclusive of, and in addition to brokerage fees, transactions fees, and other related costs and expenses, which may be incurred by the client. However, Abundance will not receive any portion of the commissions, fees and costs.

Fees for the management of retirement plans range from .20% to 1.00% of plan assets depending on the services requested and the size of the plan. The above fees do not include platform, attorney, or Third Party Administrator (TPA) fees, but are only related to the services that Abundance provides to the plan.

On private investments, Abundance charges a fee equivalent to the client's investment management fee, usually on the total deployed capital amount for the life of the investment, as opposed to the market value of the asset.

Abundance charges a fixed annual fee of \$50 on cash, checking or money market assets billed monthly in advance and \$350 on ILIT and loan administration services billed annually in advance.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation by [CLICKING HERE](#).

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

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

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

For example, an Investment Advisor Representative of Abundance serves as part of a general partner in various investment partnerships formed for the purpose of acquiring and developing real estate. Limited partnership shares of these partnerships are offered to clients of Abundance when appropriate. This presents an inherent conflict of interest as the Investment Advisor Representative of Abundance may benefit personally from client investment into such partnerships. Conflicts of interest are specifically disclosed in the offering documents provided to investors.

For more specific information regarding compensation and conflicts, please refer our Disclosure Brochure, the ADV Part 2A under Item 10 Outside Affiliations by [CLICKING HERE](#).

- ❖ *"How might your conflicts of interest affect me, and how will you address them?"*

How do your financial professionals make money?

Financial professionals of Abundance are paid a portion of the asset management fees collected from clients. Financial professionals are not rewarded sales bonuses.

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

No. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>.

- ❖ *"As a financial professional, do you have any disciplinary history? For what type of conduct?"*

Additional Information

Additional information about our investment advisory services can be found at AbundanceLLC.com or by [CLICKING HERE](#). A copy of our relationship summary can also be requested by calling 800.253.3760.

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

ABUNDANCE

WEALTH COUNSELORS

Firm Brochure Dated: March 16, 2023

This brochure provides information about the qualifications and business practices of Abundance Wealth Counselors. If you have any questions about the contents of this brochure, please contact us at 800.253.3760. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Abundance also is available on the SEC's website at www.adviserinfo.sec.gov.

Abundance is a registered investment advisor. Registration of an investment adviser does not imply any level of skill or training, and you should not choose an investment adviser solely on the basis of their status as a registered investment adviser. Please consider the information provided to you in oral and written communications to determine whether to hire or retain an investment adviser and to evaluate an investment adviser's qualifications and business practices.

Item 2: Material Changes

As of the date of this brochure, there are no material changes to disclose.

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Item 4: Advisory Business

Abundance is a full-service, SEC registered investment advisor, located in State College, PA, and formed in 2001 by Richard DeFluri, who is the principal of the firm.

Abundance provides private wealth management services in a family office setting to its clients on an ongoing basis. The firm holistically manages client wealth, handling and coordinating all aspects of a client's financial life, and considering the tax, estate, and asset protection implications, in addition to other life factors. Abundance not only considers these factors when managing investments, but also provides advice on risk management, personal cash flow, estate, tax, asset protection, retirement, business planning, and other topics in which we are competent.

Abundance manages client investment accounts on a discretionary basis. A discretionary basis means Abundance will have the ability to invest and reinvest the client's assets by their investment objectives without consultation with the client before making a change in the portfolio.

Abundance will also provide ancillary services to clients and their families in areas such as estate administration, asset distribution, loan & trust administration, and private banking services.

Additionally, Abundance will provide advice on, and/or offer to clients, investment opportunities in private investment offerings where appropriate for the client and consistent with the client's goals and objectives.

Retirement Plans

Abundance also implements and advises on the investments of retirement plans for both organizations and individuals. Abundance can act in a fiduciary or a non-fiduciary capacity when providing services to retirement plans, can manage the investment of the assets on a discretionary or non-discretionary basis, can provide advice on investment choices when not managing the investment, and can provide both participant and plan-level services and advice.

Foundation Premium Income Fund, LP, and Foundation Green Income Fund, LP

Abundance is a joint owner of Foundation Premium Income GP, LLC and Foundation Green Income Fund GP, LLC which act as the general partners for pooled investment vehicles, Foundation Premium Income Fund, LP and Foundation Green Income Fund, LP (the "Fund", collectively "Funds"). The Foundation Premium Income Fund, LP investment program involves selling option contracts on fundamentally evaluated individual securities and attempts to hedge

risks. The Foundation Green Income Fund, LP investment program's objective is to invest in companies that focused on environmentally sustainable practices.

Clients may be invited to invest in private placements, but only if it is appropriate for the client. Investments in the Funds will be made on a non-discretionary basis only. Foundation Premium Income GP, LLC and Foundation Green Income Fund GP, LLC both charge a management fee to the Fund (please see Item 5 for details). The assets in the Funds are managed in accordance with the Fund's respective offering documents. Clients invested in the Funds should carefully consult the Funds' governing documents for information related to the Fund's investment program and risks.

Abundance requires a minimum client balance of \$1 Million in assets under management. This requirement may be waived upon review of the client's circumstances and relationship to Abundance or its clients. Abundance also maintains the ability to waive or negotiate fees with clients at the sole discretion of Abundance.

As of December 31, 2022, Abundance actively managed \$1,068,883,279 billion of client assets on a discretionary basis across 1,476 accounts including Foundation Premium Income Fund, LP, and Foundation Green Income Fund, LP.

Item 5: Fees and Compensation

The annual fee for investment management is charged as a percentage of assets under management, plus where applicable, certain fixed annual fees as described below.

Market Value of Assets	Annual Fee
\$ 0 - \$2,000,000	1.00%
\$ 2,000,001 - \$3,000,000	0.95%
\$ 3,000,001 - \$4,000,000	0.90%
\$ 4,000,001 - \$5,000,000	0.85%
\$ 5,000,001 - \$10,000,000	0.80%
\$10,000,001 - \$15,000,000	0.70%
\$15,000,001 - \$20,000,000	0.60%
\$20,000,001 and above	Negotiable
Abundance Enhanced Fixed Income Strategy	0.40%
100% Fixed Income Portfolios	0.40%

Fees for the management of retirement plans range from .20% to 1.00% of plan assets depending on the services requested and the size of the plan. The above fees do not include platform, attorney, or Third-Party Administrator (TPA) fees but are only related to the services that Abundance provides to the plan. Fees for investment management are negotiable at the sole discretion of Abundance.

Private Investments

Abundance charges a fee equivalent to the client's investment management fee on the market value of the asset. If a market value is not available for a private investment, Abundance will base the fee on the total deployed capital amount for the life of the investment. This is due to the difficulty in obtaining accurate valuations on this asset class. If a private investment does provide Abundance with valuations, the valuation provided by the private investment will be used for fee calculations. Finally, if a value is determined in a liquid market, the valuation may be updated to reflect the market value for fee calculations. This fee will apply for private investments that Abundance performs due diligence on, offers to clients, reports on, and administers for the client. The deployed capital amount, sponsor-provided valuation, or the market value in cases where there is liquidity, will factor into determining the investment management fee.

Fixed annual fees are assessed as follows:

Cash/Checking/Money Market Assets	\$50 annual fee, billed monthly in advance
ILIT / Loan Administration Services	\$350 annual fee, billed annually in advance

Abundance excludes certain assets when calculating management fees and will identify such assets and inform the client when this situation applies. The assets excluded will not be taken into consideration when determining the management fee tier.

Fees are deducted at the beginning of each month, or if a client chooses, they will be billed and may pay the invoice using outside funds. The monthly fee is determined by the account balance at the end of the previous month. Fee schedules are reviewed monthly and updated based on the previous month's assets under management. The fees billed by Abundance are only for advisory services provided by Abundance and do not include broker commissions, mutual fund expenses, or other trading and investment-related expenses. Those fees are in addition to the investment advisory fee charged by Abundance.

Abundance requires that clients sign a Client Service Agreement which sets forth the nature and terms of the agreement, including the fee schedule. Abundance does not collect unearned fees

in excess of \$1,200 not expected to be earned within 6 months. A Client Service Agreement may be terminated by either party for any reason upon receipt of 30 days written notice. All fees billed in advance will be refunded on a pro-rata basis.

Clients should be aware that similar advisory services may be available from other investment advisors for similar or lower fees.

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

Abundance does not charge performance-based fees.

Item 7: Types of Clients

Abundance primarily advises and manages the investments of individuals and families with significant investible assets. We also work with businesses, their retirement plans, and captive insurance companies, along with estates, trusts, and some charitable organizations. As stated above in Item 4, Abundance also acts as the investment manager for the Funds, and pooled investment vehicles.

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

Abundance maintains separately managed investment accounts for clients. We manage those accounts to a certain allocation model, with variations based on the size of the particular account and the objectives of the account's owner(s). Therefore, there will generally be some variation between accounts.

The Abundance investment strategies are diversified globally and consist of individual equity & fixed income components, mutual funds, and exchange-traded funds (ETFs), and are available for different risk levels as determined to be appropriate by the client and advisor. The strategies are allocated between equity, fixed income, cash, and hedging strategies and are generally fully invested unless economic and/or market conditions would warrant placing a higher amount of the portfolio into cash. Abundance tends to focus primarily on long-term investments; however, accounts and positions are rebalanced periodically to maintain the proper allocations. From time to time, we will make tactical trades within portfolios or change the allocation to match our market outlook. These relatively short-term trades could be utilized to take advantage of trends or opportunities that we see or could be utilized to capitalize on a significant price swing.

The components and allocations of our investment strategies are determined using fundamental analysis, technical analysis, fund analysis, and cyclical analysis. Our chosen asset allocations at a given time are meant to balance and reduce the risk of any one security, market, industry, or geographical area. Fundamental analysis relies on evaluating the value of the security by looking at economic and financial factors and looking to see whether the market has underpriced or overpriced the security. The fundamental analysis fails to analyze market movements and technical measures but looks at the value of the security itself. Technical analysis uses past market movements and charting to predict the future direction of a security and the overall market based on patterns, support, and resistance, among other factors. Technical analysis also analyzes the cyclical nature of markets and certain securities as they rise and fall against the overall market. Technical analysis attempts to predict price movements based on investor psychology but does not account for market & security fundamentals or underlying financial conditions. Fund analysis looks at the track record and experience of a fund's management, along with the underlying investments in a fund or ETF. This type of analysis is helpful but does not provide Abundance with control over the underlying investments. Fund analysis also cannot predict future success for a fund based on historical performance and is heavily dependent on the continuity of management.

Abundance does utilize the services of Investment Research Partners, LLC, a Registered Investment Advisor, to assist in portfolio management and to sit on the Investment Committee. Investment Research Partners provides market commentary, research, and recommendations to Abundance. Investment Research Partners is granted discretionary authority to affect trades on fixed-income accounts or other accounts as selected by Abundance. Further, Investment Research Partners is granted authority to place trades in accounts at the direction of Abundance.

No investment is free of risks. Our methods of analysis rely on accurate information on which we base our opinions and advice. Inaccuracies in underlying information will skew our opinions. Current and prospective Abundance clients are cautioned that investments in securities involve risk of loss, including the possibility of a complete loss of the amount invested. All investors should be prepared to bear these risks. One of Abundance's top priorities is to make sure clients understand the potential investment risks and rewards. Past performance is not an indicator of future results and while history can be used to evaluate potential future results, there is no guarantee that those predictions will wind up being accurate.

Risk of Loss

There are always risks to investing. Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear. It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks:** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences for markets around the world.
- **General Market Risks:** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk:** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk:** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure, or laws impact the return on these investments.
- **Tax Risks Related to Short-Term Trading:** Clients should note that Abundance may engage in short-term trading transactions. These transactions may result in short-term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long-term strategies. Abundance endeavors to invest client assets in a tax-efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk:** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk:** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk:** The amount of debt or leverage determines a company's financial risk.
- **Default Risk:** This risk pertains to the ability of a company to service its debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk:** "Margin" is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin, therefore, carries a higher

degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. Abundance may utilize margin on a limited basis for clients with higher risk tolerances.

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- Risks specific to private placements, sub-advisors, and other managers: If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ. It is also possible that the information given to Abundance by the manager or private placement is inaccurate or insufficient for Abundance to render appropriate investment advice to the client regarding the investment. In addition, while many managers are registered, their private placement offerings may not be, which means they have not undergone as much scrutiny as a registered investment vehicle. Also, concerning private placements, the manager of the private placement typically has control over the funds in the private placement, including the payment of expenses, which means the manager has a conflict in allocating expenses to be paid by the placement or the manager itself. Each private placement has a unique set of risk factors disclosed in its private placement memorandum. Clients should carefully review these, and all other documents made available to them regarding private placements.
- Information Risk: All investment professionals rely on research to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- Small Companies: Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have the potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, but if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value to be sold in a shorter time frame.
- Concentration Risk: While Abundance selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation

comes without an overlay of general economic or sector-specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

- Transition risk: As assets are transitioned from a client's prior advisers to Abundance there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold to reposition the portfolio into the asset allocation strategy selected by Abundance. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Abundance may adversely affect the client's account values, as Abundance's recommendations may not be able to be fully implemented.
- Restriction Risk: Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- Risks Related to Investment Term & Liquidity: Securities do not follow a straight line up in value. All securities will have periods when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period. Liquidating these investments before their intended time horizon may result in losses.
- REITs: In very limited circumstances, Abundance may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as "REITs". A REIT is an entity, typically a trust or corporation, that accepts investments from several investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income, and the relatively low barrier to investing in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful but lose significant principal if the properties are not successful. REITs may also employ significant leverage to purchase more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss.

The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.

- Mutual Funds: Investing in mutual funds brings risks specific to that type of investment. These include, but are not limited to (i) market risk (risks that the value of the mutual fund will be affected by the performance of the overall markets, despite the management of the portfolio manager); (ii) inflation risk (the risk associated with the diminution of value of the mutual fund's shares as inflation increases); (iii) interest rate risk (the risk that with the fluctuation of interest rates, the perceived or relative value of the underlying holdings in the mutual fund may decrease); (iv) currency risk (the risk that investments made in one currency may diminish in value not fundamentally but instead because the currency of the investment's domicile is adversely impacted); and (v) credit risk (the risk that fixed income funds that invest in bonds may invest in bonds the borrowers of which are not creditworthy and may not make bond payments).
- ETFs: Investing in ETFs brings risks specific to that type of investment. These include, but are not limited to (i) trading risk (the risk that trades placed may not be executed in a timely manner); (ii) liquidity and shutdown risks (the risks that the ETF may not be as liquid as intended due to the possibility of the ETF or the markets as a whole being suspended); (iii) Authorized participant risk (the risk that an institutional firm which has entered into an agreement with the ETF's distributor to receive shares of the ETF in exchange for securities will cease to be active or change in identity thus creating a potential interruption in trading or redemptions for investors; (iv) Trade price differentiation/Disassociation for the index (the risk that the actual price of the ETF may deviate from the index it is intended to track or from the underlying value of the holdings; and (v) conflicts of interest (the risk that certain institutions (for example authorized participants) may act in their own best interests instead of fulfilling their contracts or acting in the best interests of investors).
- Excess Cash Balance Risk: Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation-related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, direct. You may elect to participate in a "cash sweep" program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash-based investments, such as money market funds. We do not receive compensation of any kind for facilitating your participation in such cash sweep accounts.

Cryptocurrencies and Associated Risks

Cryptocurrencies are not currently an active part of the investment strategy used by Abundance and exposure to cryptocurrency investments is only utilized in a client account

at the request of the client. Cryptocurrencies are digital currencies using decentralized control meaning they are not controlled by any one person or government. Abundance clients do not hold cryptocurrencies directly but through investment vehicles that hold cryptocurrencies. This means Abundance clients have exposure to the same risks as they would with investing directly in cryptocurrencies such as cybersecurity, regulatory and governmental risk, extreme price volatility, tax implications, transactional or ownership complications, and exposure to illegal activities such as fraud and money laundering.

Investment Strategy – Foundation Premium Income Fund, LP, and Foundation Green Income Fund, LP

The Funds will be managed according to the stated investment program in the Funds' private placement memorandums. Individual partners in a fund will not receive individual asset management within the Fund. For details regarding the investment program, clients should refer to the Fund's governing documents.

Item 9: Disciplinary Information

Abundance is required to disclose all legal and disciplinary events that are material to a client's or prospective client's evaluation of Abundance and the integrity of its management.

Neither Abundance nor its management personnel have any reportable disciplinary events to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Related persons of Abundance are actively engaged in both affiliated and non-affiliated outside business activities.

Insurance

Abundance Risk Management (*Risk*) was formed by Richard DeFluri as an insurance agency to receive and distribute revenues from the sale of life, long-term disability, and long-term care insurance products by representatives of *Risk*, who may also be employees of Abundance.

Richard DeFluri is the sole manager and member of *Risk* and will profit from revenues received by *Risk*. Abundance will source and recommend insurance policies through *Risk*, for which *Risk* will receive industry customary commissions. Clients are not required to purchase insurance through *Risk* and may look for similar policies through other insurance brokers or carriers. *Risk* utilizes outside insurance brokers to search the market and source appropriate policies. These

brokers are selected based on the quality of services provided and the cost of those services. Abundance seeks to recommend the policy that is the best selection for each given client. Clients should be aware that this presents a conflict of interest, as some policies may carry higher commissions than others. As a result of this conflict, insurance assets on which Abundance is compensated by a third party will be excluded from the calculation of advisory fees. Abundance makes every effort to minimize those risks and act in the best interest of the clients at all times.

It is important to know that Abundance Risk Management is an affiliated entity that sells insurance products on a commission basis. Clients of Abundance may be referred to Abundance Risk Management for insurance needs but are not required to purchase insurance from that entity. Abundance Risk Management receives commissions on insurance policies that it writes.

When appropriate, Abundance may recommend certain financial products and investment opportunities to clients that may financially benefit other clients. When offering an investment opportunity or product under this scenario, Abundance will disclose its relationship with the offeror of the product or investment opportunity to the client considering the investment or purchase, to mitigate any conflicts of interest that exist or may arise.

Richard F. DeFluri, Ltd. (*Limited*) is an insurance agency formed and owned by Richard DeFluri. *Limited* sourced insurance policies for clients through outside insurance companies and brokers. *Limited* is no longer in use for writing new policies but exists to collect trailing commissions on insurance policies written before the creation of *Risk*.

Attorney

John Schaffer, as an active member of the Pennsylvania Bar, practices law through his firm, Estate Design, LLC, which is independent of Abundance. Those activities are separate from Abundance. Clients may be referred by Abundance to John Schaffer for certain legal services. John Schaffer may also refer business out to attorneys not associated with Abundance. In exchange for those referrals, outside lawyers or their firms may offer referral fees as a percentage of the total fee. This fee is customary in the legal profession and cannot inflate the amount charged to the client. Referral fees must also be disclosed to the client. This presents a conflict of interest, as John Schaffer may personally benefit from a business referred to him by Abundance or by a business that he refers to attorneys independent from Abundance. Not all attorneys pay referral fees, which could provide an incentive to refer business only to those attorneys who pay referral fees to the referring attorney, as opposed to the best attorney for each given case. As a fiduciary, Abundance, and its related persons must act in the best interest of each client. Therefore, any legal referrals made by Abundance or John Schaffer will be based

on the qualifications of the attorney and the unique client situation, not on the amount, if any, of the referral fee.

Private Investments

Abundance or related persons may be managing members of limited liability companies (*LLCs*), and/or a part of general partners of Limited Partnerships (*LPs*) formed to operate a business, and/or provide administrative tasks to, in which clients may be solicited to invest. Clients will be advised of any such relationship in which Abundance or one of its related persons may benefit financially by client investment into such partnerships. Client assets invested in such partnerships will be excluded from assets under management calculations to determine advisory fees to avoid double dipping, where ongoing management fees are charged inside of the partnership. Abundance and its advisors may recommend private investment opportunities to clients, where appropriate. Clients are under no obligation to invest in any private investment that is offered. Investment in private investment opportunities is at the complete discretion of the client, who must subscribe to such offerings.

An Investment Advisor Representative of Abundance serves as part of a general partner in various investment partnerships formed for the purpose of acquiring and developing real estate. Limited partnership shares of these partnerships are offered to clients of Abundance when appropriate. This presents an inherent conflict of interest as the Investment Advisor Representative of Abundance may benefit personally from client investment into such partnerships. Conflicts of interest are specifically disclosed in the offering documents provided to investors.

Abundance Equity Partners (*Equity*), was formed to source private investment opportunities for clients, and/or act as a part of a general partner or managing member of private investments. Investment opportunities may be associated with Abundance and its related persons, or independent of Abundance and its related persons.

Abundance acts as a servicing processor for SAFHarbor Fund and will assist clients in completing subscription documents for SAFHarbor Fund. Conflicts of interest will be disclosed to clients before offering such investment opportunities as part of Abundance's advisory business.

Clients interested in investing in private offerings recommended or presented by Abundance should refer to the investment's private placement memorandum for more information specific to the offering.

Clients who subscribe to private offerings through Abundance or which are related entities will have those interests reflected on their Abundance statements. Additionally, clients may wish to post certain private investments sourced from outside of Abundance on their Abundance

statements. Abundance is not responsible for providing valuations on these assets. Therefore, the valuation may be reflected at cost basis, or updated when valuations are provided to Abundance by the client, general partner, or sponsor of the offering.

Because Abundance is affiliated with Foundation Premium Income GP, LLC, and Foundation Green Income Fund GP, LLC, the investment managers, and general partners to the Funds, representatives of Abundance have the incentive to recommend an investment in the Funds. This incentive brings about a material conflict of interest, in that Abundance, and in some cases, the specific individual representative will have a personal financial interest in the Funds. Abundance attempts to mitigate this conflict by (a) disclosing the conflict here in this Brochure; (b) only accepting investments in the Funds on a non-discretionary basis; and (c) reminding all employees of their fiduciary responsibilities to clients. Clients are encouraged to have their other advisors review the respective Fund documents, terms, and objectives. Clients are also encouraged to carefully review all documents regarding the Funds and inquire as to any questions, comments, or concerns before making an investment.

Outside Business Activities Conflict of Interest

John Schaffer is the managing member of Antifragile Brewing Company where clients of Abundance have made personal investments in the company. This presents a conflict where Mr. Schaffer has an opportunity to personally gain from the business which may incentivize Mr. Schaffer to render investment advice to such clients based on what they would believe would likely improve their personal investment performance rather than that of the client in question. Ultimately, it is at the sole discretion of the client to participate in the investment or not. If the client does participate, Abundance does not receive any compensation. Further, the investment is segregated from the investment management the client engaged Abundance for. The conflict is mitigated by disclosing it to the client in question, by reiterating to all employees of Abundance the fiduciary obligations of each employee, and through the monitoring of private investments as discussed in the Firm's Code of Ethics.

Several representatives of Abundance are separately licensed as independent insurance agents to service existing Clients that have insurance products. Abundance does not intend to sell new insurance products but can do so if warranted. As such, representatives of Abundance may conduct insurance product transactions for Clients in the capacity of licensed insurance agents and will receive customary commissions for these transactions in addition to any compensation received from advisory services. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Representatives of Abundance, therefore, have the incentive to recommend insurance products based on the compensation to be received. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and Clients should be aware of this conflict when considering whether to engage Abundance or utilize Abundance representatives to implement any insurance

recommendations. Abundance attempts to mitigate this conflict of interest by disclosing the conflict to Clients and informing the Clients that they are always free to purchase insurance products through other agents that are not affiliated with Abundance, or to determine not to purchase the insurance product at all. Abundance also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their fiduciary duty to the clients of Abundance, which requires that employees put the interests of Clients ahead of their own.

Rollover Recommendations Conflict of Interest

When recommending that a client roll over his or her account from a current ERISA-covered retirement plan to an IRA, Abundance and its investment adviser representatives have a conflict of interest. Abundance and its representatives can earn investment advisory fees by recommending that a client rollover his or her account at the retirement plan to an IRA; however, Abundance and its investment adviser representatives will not earn any investment advisory fee if the client does not roll over the funds in the retirement plan (unless a client retained the firm to provide advice about the client's retirement plan account or the retirement plan has retained the firm to provide advice at the plan level). Thus, Abundance and its investment adviser representatives have an economic incentive to recommend a rollover of the retirement plan account, which is a conflict of interest. Abundance has taken steps to manage this conflict of interest arising from rolling over funds from an ERISA-covered retirement plan to an IRA. Abundance and its investment adviser representatives will (i) provide investment advice to ERISA-covered retirement plan participants regarding a rollover of funds from the ERISA-covered retirement plan by the fiduciary status described below, (ii) not recommend investments that result in the firm receiving unreasonable compensation related to the rollover of funds from the ERISA covered retirement plan to an IRA, and (iii) fully disclose compensation received by Abundance and its supervised persons and any material conflicts of interest related to Abundance recommending the rollover of funds from the ERISA covered retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

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

As a fiduciary, Abundance and its related persons have an ethical and legal obligation to act in the best interest of the client. Abundance has adopted and maintains a written code of ethics that sets forth high ethical standards of integrity, loyalty, and fairness which Abundance and its employees must abide by. Employees of Abundance are required to abide by the code of ethics not only based on the letter but on the spirit of its intent. The code of ethics requires Abundance and its employees to abide by all applicable federal securities laws.

Abundance's code of ethics covers the topics of confidentiality, personal securities transactions, and insider trading. The code of ethics is designed to protect client information and prevent the interests of Abundance employees from interfering with making or implementing decisions in the best interest of our clients, while still allowing employees to participate in capital, derivatives, and debt markets, and to prevent employees from acting on the material, non-public information when trading their own or client accounts.

To minimize conflicts of interest, Abundance requires preclearance approval for employees purchasing private securities or IPOs.

Annually, the code of ethics is reviewed and acknowledged in writing by each employee that he or she will abide by its terms. Access Persons must complete an annual questionnaire on outside business interests and activities and must submit their annual securities holdings to the Chief Compliance Officer.

A copy of our Code of Ethics is available to clients and prospective clients upon request.

Abundance may offer private securities or limited partnership investments where Abundance or related persons have a financial interest. These conflicts will be disclosed to clients that invest.

Unless otherwise directed by the client, Abundance maintains discretionary authority over brokerage selection and commissions paid. Abundance custodies client assets with a broker-dealer and selects that broker based on what it perceives as the best overall value for the client along with the broker's compatibility with our business model. The determination is not made on one factor, such as cost, but on a combination of criteria. Abundance looks to the best qualitative execution, which factors in cost, brokerage services, reputation, the value of research provided, customer service, execution capability, commission rates, and the ability for Abundance to hold power of attorney over client assets, among other criteria. As a result of our due diligence, we have chosen to execute trades through National Financial Services, LLC and Fidelity Brokerage Services, LLC, collectively referred to as "Fidelity". For captive insurance accounts, Mission Management & Trust Co. ("Mission") is utilized.

Item 12: Brokerage Practices

Clients may direct brokerage to the broker of their choosing, along with any restrictions or limitations on Abundance's discretion in writing. Any future amendments must also be provided by the client to Abundance in writing. In the rare event that a client directs brokerage to a broker other than that generally used by Abundance, Abundance will not be able to negotiate commission rates, obtain volume discounts, obtain the best execution, or aggregate trades.

Clients who choose to direct brokerage may see a disparity in commission charges and execution from those clients who do not direct brokerage.

Abundance utilizes block trades wherever possible to the advantage of clients. Block trading allows us to trade multiple client accounts in one transaction, with trading costs shared on a pro-rated basis between the accounts aggregated in the block. Block trades allow for faster trade execution and average pricing to clients. Abundance will seek to improve pricing when dealing with block trades in certain securities. Abundance will not block trades for client accounts in which the client has restricted us from this practice or in the case where a client has directed brokerage to a broker other than Fidelity or Mission Trust. In these cases, accounts will be traded after our managed accounts at Fidelity and Mission.

Abundance does not enter into soft-dollar arrangements and does not receive any benefits from Fidelity or Mission which are based on client account activity. As the custodian of client accounts, Fidelity and Mission do provide Abundance with certain benefits which are not based on client security transactions and generally benefit all clients, regardless of account size, and allow us to provide better service to clients.

Fidelity and Mission provide Abundance access to institutional platform services, which are not available to retail investors and include brokerage, custody, and other related services. These services assist Abundance in managing and administering client accounts and include software and other technology that provides access to client account data, facilitates trade execution, and allocate aggregated trade orders for multiple client accounts, provides research, pricing, and other market data, facilitates payment of fees from client accounts, and assists with back-office functions, record-keeping, and client reporting.

Fidelity also offers Abundance business support services, such as complimentary or reduced-rate access to specialty software, research, publications, educational conferences and seminars, practice management resources, consultants, and third-party service providers with whom Abundance may contract directly, sometimes at preferred rates. Fidelity does not charge clients a custody fee but does make money on commissions and other transaction-related or asset-based fees from client trades executed through Fidelity or settled into Fidelity accounts. Fidelity provides access to certain no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges along with low-cost ETFs which are not always available to retail accounts.

The services offered by Fidelity at no additional cost provide an incentive to continue to use and expand the use of Fidelity's services. Abundance has examined this potential conflict of interest and has determined that it is in the best interest to maintain our brokerage and custody relationship with Fidelity. We will continue to monitor the services provided by Fidelity

compared to what is available on the market periodically to make sure that a continued relationship with Fidelity continues to be in the best interest of Abundance clients. Should Abundance determine that we are no longer receiving what we believe to be best execution, based on our qualitative factors, for client accounts, we will transition client accounts to the custodian/broker that we feel provides best execution.

Abundance is independently owned and operated and has no affiliation with Fidelity or Mission.

While Abundance has a custodial relationship with Mission for its captive insurance clients, trades are executed through Fidelity.

Item 13: Review of Accounts

Abundance reviews client accounts on an ongoing basis by the client's objectives and under any guidelines imposed, continually monitoring the underlying investments in those accounts. More frequent reviews may be triggered by changes in the client's individual circumstances, goals, or investment objectives, in addition to changes in the market, the overall economic outlook, or the political landscape.

Regular reviews of accounts are performed by the Investment Department under the direction of the Investment Committee. The Investment Committee may decide to trigger additional reviews of client accounts based on changing economic conditions resulting in changes to target allocations, or an advisor may trigger additional reviews of specific client accounts based on changing factors unique to the individual client. Abundance does utilize Investment Research Partners, LLC, an unaffiliated registered investment advisor, to participate as a member of the Investment Committee.

Abundance provides clients with annual account statements either through the client portal in Tamarac or by hard copy if the client elects not to use Tamarac to retrieve the report. In addition, the custodian will provide the client with quarterly statements. Clients should compare the annual report from Abundance with the statements received from the custodian and notify Abundance if there are any discrepancies.

Abundance advisors meet with clients through several means, as frequently as necessary, based on the complexity of each client's situation and needs.

Item 14: Client Referrals and Other Compensation

While Abundance attracts clients primarily through existing client referrals, we do not reward clients for those introductions through discounted fees, or other special benefits.

Abundance may have certain referral arrangements in place with third parties that refer clients to us. In such cases, the referring party will enter into a written agreement with Abundance, and the referral arrangement will be disclosed to the client. In all cases, the referring party will provide a prospective client with this Firm Brochure and disclosure of the arrangement. In no case will fees be increased for the client due to referral agreements.

Abundance, its officers, and representatives may receive incentive income in the form of commissions from third-party firms. In addition to monetary compensation, trips and prizes may be awarded to Abundance and its representatives as a result of business written with these outside firms. Compensation earned by Abundance in relation to client assets in addition to the investment management fee charged on those assets creates an inherent conflict of interest. Abundance does not accept income from third-party firms where such payments are not customary in the industry. If there is any question as to whether the income is not customary in the industry, it will be reviewed by Compliance personnel to make sure that decisions are being made in the best interest of the clients. Additionally, incentives such as prizes and trips will be reviewed by Compliance personnel before acceptance, to make sure that the prizes are not awarded to encourage future business. Abundance, at all times, seeks to minimize any conflicts of interest and act in the best interest of the client.

Item 15: Custody

Abundance is deemed to have custody of client funds, due to our power of attorney and the ability to withdraw advisory fees. We never maintain physical custody of any of our client assets but will assist clients in transferring them to the custodian. Abundance maintains client funds with qualified custodians, or in the case of private investment opportunities, on the books of those partnerships.

For accounts in which Abundance directly deducts advisor fees, the amounts will be reflected on the statements from the custodian. Clients are encouraged to verify that the amount deducted in fees each month is accurate. If a discrepancy is noticed, we request that you notify Abundance immediately.

The custodian will provide account statements directly to the account owner, our client, at least quarterly. Clients should contact Abundance if they believe that there are any errors about an account.

Item 16: Investment Discretion

Clients must sign a Client Service Agreement when establishing an advisory relationship with Abundance. Abundance has full investment discretion over the assets under management. Because Abundance has discretion over client assets under management, the firm can trade those assets without first requesting permission to do so from the client.

Abundance seeks to keep trading costs to a minimum, so we execute trades when necessary to make adjustments to the holdings when our strategy shifts, harvest tax losses, or rebalance accounts to maintain the proper asset allocation. The firm will also trade accounts when the client adds funds, requires or requests a distribution, or requests that certain securities are purchased or sold.

Clients may add reasonable restrictions on their respective accounts through written instructions or through their advisor about purchasing specific securities, restricting the sale of specific securities, requesting a certain amount be kept in cash or cash equivalents, establishing accounts to be maintained entirely in cash, or establishing individually directed accounts for personal trading over which Abundance does not have discretion.

Abundance does not exercise its investment discretion for clients wishing to invest in private offerings but will assist the client in making that investment once the client subscribes to that particular offering.

Item 17: Voting Client Securities

Abundance votes proxies for all client accounts. However, clients may exercise their ability to vote their own proxies, through written instruction to Abundance. Unless a client restricts the firm's ability to vote proxies, Abundance will utilize third-party research and proxy voting services to make sure that client proxies are voted in the best interest of the shareholders. Abundance will maintain records of all proxies voted, and any client instructions received for the required period.

For pooled retirement plans in which Abundance serves as a co-fiduciary, the plan will have its proxies voted by third-party service providers employed by Abundance unless otherwise reserved by the plan sponsor in the Plan Documents. For participant-directed retirement plans the plan sponsors vote the proxy.

Abundance utilizes a third-party service to represent clients who own securities involved in class action lawsuits. Clients may request in writing to opt out of this service if they wish to file their

claims. Clients may not opt-out on a case-by-case basis unless they are engaged as a lead plaintiff. While there are no upfront charges for this service, the service provider will collect a contingency fee of 20% of the total reimbursement of asset settlements it collects for clients.

Foundation Premium Income GP, LLC and Foundation Green Income GP, LLC are investment managers and general partners of the Funds and will vote proxies on behalf of the Funds. Investors in the Fund will not be able to direct the vote on any particular solicitation.

A complete copy of Abundance's proxy voting policy along is available upon request. Additionally, clients may request information on how the shares in their respective accounts were voted. This information may be obtained by contacting, Aaron Huey, at ahuey@abundancellc.com or 800.253.3760.

Item 18: Financial Information

Abundance is not affected by any financial condition that would reasonably limit or impair its ability to meet its fiduciary and contractual commitment to clients. Abundance has not been the subject of a bankruptcy petition at any time.

ABUNDANCE

WEALTH COUNSELORS

Brochure Supplements
March 16, 2023

Richard F. DeFluri
John J. Schaffer
Aaron R. Krasney
Martin A. Wildy

Jamie L. Felker
Ann L. Mallison
Geoffrey P. Caber
Derek W. Varner

ABUNDANCE 800.253.3760 232 Regent Court State College, PA 16801

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Abundance Wealth Counselors
232 Regent Court
State College, PA 16801
800.253.3760

Richard F. DeFluri
Principal & Wealth Counselor



This brochure supplement provides information about Richard DeFluri that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Richard Frank DeFluri Born: 1950

Post-Secondary Education:

Bachelor of Science: Business Administration, The Pennsylvania State University, 1974
PA Life, Accident & Health Insurance Licensed, 1976

Professional Designations:

Certified Investment Management Consultant² (CIMC), 2007
Accredited Investment Fiduciary¹ (AIF), 2006
Registered Financial Consultant³ (RFC), 1997

Business Background:

2001 – Present: Abundance Wealth Counselors: Principal & Wealth Counselor
2014 – Present: Abundance Equity Partners: Managing Member
2013 – Present: Urban Storage Fund, LP: Managing Member
2012 – Present: Sherwood, LP: General Partner (non-controlling)
2011 – Present: Village at Canterbury, LP: General Partner (non-controlling)
2003 – Present: Abundance Risk Management: Managing Member
2006 – 2013: Abundance Medical Consulting: Managing Member
2001 – 2006: All Seasons Storage Fund: General Partner
1987 – Present: Thoroughbred Aviation: President
1974 – Present: Richard F DeFluri, LTD: President

Item 3 - Disciplinary Information

Richard DeFluri has no history of disciplinary events.

Item 4 - Other Business Activities

Licensed Insurance Agent: May receive separate, yet customary commissions from multiple firms for the sale of insurance products to clients of Abundance. The receipt of compensation creates an inherent conflict of interest as he has incentive to recommend insurance products based on compensation received in commissions as opposed to what is best suited for the client.

Founder and Managing Member:

Abundance Risk Management: Established to receive and distribute revenues from the sale of life, disability, and long-term care lines of insurance by associated persons of Abundance who are licensed to sell such products.

Richard F. DeFluri, Ltd.: Established for insurance activities prior to the formation of Abundance Risk Management. Currently, all insurance business is run through Abundance Risk Management, and the sole purpose of this entity is to receive trailing commissions.

Abundance Equity Partners: Established to receive and distribute income generated from General Partner fees and distributions for which related persons of Abundance serve as part of a general partner in private investment offerings.

General Partner, Private Investment Partnerships: Serves as part of a general partner in various investment partnerships formed for the purpose of acquiring and developing real estate. Limited partnership shares of these partnerships are offered to clients of Abundance when appropriate. This presents an inherent conflict of interest as Richard DeFluri may benefit personally from client investment into such partnerships. Conflicts of interest are specifically disclosed in the offering documents provided to investors.

Thoroughbred Aviation: Established for the purpose of owning and leasing private aircraft.

Richard DeFluri devotes less than 30% of his time to outside business activities.

Item 5 - Additional Compensation

Richard DeFluri may receive compensation and awards through Abundance Risk Management as a result of recommendations and sales of insurance products and may also receive compensation as part of a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Richard DeFluri is supervised by the Chief Compliance Officer, Lauren Gretchen, along with the Leadership Committee, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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232 Regent Court
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Jamie L. Felker
*Chief Executive Officer &
Wealth Counselor*



This brochure supplement provides information about Jamie Felker that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Jamie Lee Felker

Born: 1971

Post-Secondary Education:

Masters of Arts, Organizational Management, University of Phoenix, 2000
Bachelor of Science, Business Administration, Robert Morris University, 1995
Associate of Science, Aviation, Community College of Beaver County, 1992

Professional Designations:

Accredited Investment Fiduciary¹ (AIF), 2006
PA Life, Accident and Health Insurance Licensed, 2019

Business Background:

2012 - Present: Abundance Wealth Counselors: Chief Executive Officer & Wealth Counselor
2005 - 2011: Abundance Wealth Counselors: Chief Operating Officer & Compliance
2003 - 2005: Merrill Lynch: Vice President
2001 - 2003: Merrill Lynch: Assistant Vice President
2000 - 2001: Merrill Lynch: Six Sigma Black Belt
1995 - 2000: Merrill Lynch: Manager Supervisor & Quality Integration Analysis

Item 3 - Disciplinary Information

Jamie Felker has no history of disciplinary events.

Item 4 - Other Business Activities

Licensed Insurance Agent: Jamie Felker may receive separate, yet customary commissions from multiple firms for the sale of insurance products to clients of Abundance. The receipt of compensation creates an inherent conflict of interest as he has incentive to recommend insurance products based on compensation received in commissions as opposed to what is best suited for the client.

Item 5 - Additional Compensation

Jamie Felker may receive compensation and awards through Abundance Risk Management as a result of recommendations and sales of insurance products and may also receive compensation as a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Jamie Felker is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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John J. Schaffer

Wealth Counselor



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Item 2 - Educational Background & Business Experience

Name: John James Schaffer

Born: 1984

Post-Secondary Education:

Juris Doctor, The Pennsylvania State University, 2012

Masters of Business Administration, The Pennsylvania State University, 2012

Bachelor of Science, Business Marketing, The Pennsylvania State University, 2006

Professional Designations:

Certified Private Wealth Advisor⁴

Business Background:

2019 - Present: Abundance Wealth Counselors: Wealth Counselor

2014 - 2019: Abundance Wealth Counselors: Chief Compliance Officer & Wealth Counselor

2013 - 2014: Abundance Wealth Counselors: Compliance Officer

2012 - 2013: Hunt Law: Associate Attorney

2006 - 2007: JPI Construction Services: Assistant Superintendent

Item 3 - Disciplinary Information

John Schaffer has no history of disciplinary events.

Item 4 - Other Business Activities

Attorney: As an active Pennsylvania attorney John Schaffer may, through his outside law firm, provide legal services for both clients of Abundance and non-clients outside of his capacity with Abundance Wealth Counselors. Clients may be referred to John for legal services in exchange for attorney fees. John may also refer clients to outside attorneys, for which he may receive a referral fee. This presents a conflict of interest, which will always be disclosed prior to a client retaining an attorney.

Managing Member: As the managing member of Antifragile Brewing Company, John oversees the financial and business strategy of the company. John stands to personally gain from any investment made into Antifragile Brewing Company which presents a conflict of interest. This is disclosed to the public.

Item 5 - Additional Compensation

John Schaffer may receive additional compensation in the form of attorney fees and referral fees related to referrals to outside attorneys for client legal services. John also stands to personally financially benefit from any investment into Antifragile Brewing Company by clients.

Item 6 - Supervision

John Schaffer is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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Ann L. Mallison

Wealth Counselor



This brochure supplement provides information about Ann Mallison that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Ann Leslie Mallison Born: 1976

Post-Secondary Education:

Juris Doctor, The Pennsylvania State University, 2019
Bachelor of Science in Business Administration, Villanova University, 1998
Masters of Business Administration, The Pennsylvania State University, 2001
Certificate in Social Media Marketing, Rutgers Center for Management Development, 2011

Professional Designations:

Accredited Investment Fiduciary¹ (AIF), 2021

Business Background:

November 2019 - Present: Abundance Wealth Counselors: Wealth Counselor
September 2019 – October 2019: The Pennsylvania State University: Interim Dir. Of Student Services
March 2019 – June 2019: The Pennsylvania State University: International Agreements Specialist
May 2018 – August 2018: The Pennsylvania State University: Research Assistant
January 2018- May 2018: The Pennsylvania State University: Office of General Counsel Extern
May 2017 – July 2017: The Pennsylvania State University: Entrepreneur Assistance Clinic Intern
July 2015 – July 2016: The Pennsylvania State University: Director of MBA Student Services

Item 3 - Disciplinary Information

Ann Mallison has no history of disciplinary events.

Item 4 - Other Business Activities

Ann Mallison is not engaged in any other business activities.

Item 5 - Additional Compensation

Ann Mallison does not receive any additional compensation.

Item 6 - Supervision

Ann Mallison is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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Aaron R. Krasney

Wealth Counselor



This brochure supplement provides information about Aaron Krasney that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Aaron Ross Krasney Born: 1991

Post-Secondary Education:

Bachelor of Arts in Journalism & Mass Communication, George Washington University, 2013

Professional Designations:

Certified Financial Planner⁵ (CFP®), 2019

PA Life, Accident & Health Insurance Licensed, 2019

Accredited Investment Fiduciary¹ (AIF), 2021

Business Background:

August 2020 - Present: Abundance Wealth Counselors: Wealth Counselor

August 2019 – March 2020: Taylor Retirement Services: Financial Advisor

August 2017 – August 2019: Tobias Financial Advisors: Associate Financial Advisor

September 2016 – July 2017: Rappy's: Waiter

September 2014 – September 2016: Guidepoint: Research Manager

Item 3 - Disciplinary Information

Aaron Krasney has no history of disciplinary events.

Item 4 - Other Business Activities

Licensed Insurance Agent: Aaron Krasney may receive separate, yet customary commissions from multiple firms for the sale of insurance products to clients of Abundance. The receipt of

compensation creates an inherent conflict of interest as he has incentive to recommend insurance products based on compensation received in commissions as opposed to what is best suited for the client.

Item 5 - Additional Compensation

Aaron Krasney may receive compensation and awards through Abundance Risk Management as a result of recommendations and sales of insurance products and may also receive compensation as a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Aaron Krasney is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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Geoffrey P. Caber

Wealth Counselor



This brochure supplement provides information about Geoff Caber that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Geoffrey Patrick Caber

Born: 1967

Post-Secondary Education:

Bachelor of Science, Operations Management, University of Arizona, 1992
Central Atlantic School of Trust & Investment Management 2003

Professional Designations:

Accredited Investment Fiduciary¹ (AIF), 2006

Business Background:

August 2022 - Present: Abundance Wealth Counselors: Wealth Counselor

September 2021 - Present: Avail Investment Partners, LLC: Partner

June 2019 - Present: Investment Research Partners, LLC: Partner

January 2019 – November 2021: Compass Investments LLC: Investment Advisor Representative

April 2005 – December 2020: Purshe Kaplan Sterling Investments: Registered Representative

March 2004 – January 2019: Abundance Wealth Counselors: Chief Investment Officer

Item 3 - Disciplinary Information

Geoff Caber has no history of disciplinary events.

Item 4 - Other Business Activities

Goeff Caber may receive separate, yet customary commissions from multiple firms for the sale of insurance products to clients of Abundance. The receipt of compensation creates an inherent

conflict of interest as he has incentive to recommend insurance products based on compensation received in commissions as opposed to what is best suited for the client.

Geoff Caber is an investment advisor representative for Investment Research Partners and Avail Investment Partners, of which both are Registered Investment Advisors. Geoff Caber receives compensation in the form of salary, bonuses, or partner distributions from Investment Research Partners and Avail Investment Partners. In an attempt to mitigate this potential conflict, Abundance Wealth Counselors discloses this conflict to the public.

Item 5 - Additional Compensation

Geoff Caber may receive compensation and awards as a result of recommendations and sales of insurance products and may also receive compensation as a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Geoff Caber is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

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Martin A. Wildy

Wealth Counselor



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Item 2 - Educational Background & Business Experience

Name: **Martin Anthony Wildy**

Born: **1977**

Post-Secondary Education:

Bachelor of Science in Finance, Pennsylvania State University, 2000

Professional Designations:

Chartered Financial Analyst⁶ (CFA®), 2003

Business Background:

August 2022 - Present: Abundance Wealth Counselors: **Wealth Counselor**

September 2021 - Present: Avail Investment Partners, LLC: **Partner**

June 2019 - Present: Investment Research Partners, LLC: **Partner**

January 2015 – May 2019: Eventide Asset Management: **Portfolio Manager**

September 2006 – January 2015: Aris Wealth Services, Inc.: **Senior Portfolio Manager**

Item 3 - Disciplinary Information

Martin Wildy has no history of disciplinary events.

Item 4 - Other Business Activities

Martin Wildy is an investment advisor representative for Investment Research Partners and Avail Investment Partners, of which both are Registered Investment Advisors. Martin Wildy receives compensation in the form of salary, bonuses, or partner distributions from Investment Research

Partners and Avail Investment Partners. In an attempt to mitigate this potential conflict, Abundance Wealth Counselors discloses this conflict to the public.

Martin Wildy, maintains equity ownership in Eventide Asset Management ("Eventide"), his former employer. Martin Wildy does not have an active role with the company; however he does receive profit sharing distributions based on his equity ownership giving him an incentive to recommend investment products based on the compensation received, rather than on the client's needs. In the case of discretionary accounts, it may not always be feasible for clients to direct Abundance Wealth Counselors to invest in non-Eventide mutual funds unless clients provide specific investment restrictions in their investment policy statements. Finally, Clients are not always in a position to select non-Eventide mutual funds since they are relying on Abundance Wealth Counselors for investment management unless Abundance Wealth Counselors provides alternate mutual funds for clients to select. Avail Investment Partners attempts to mitigate this conflict of interest by disclosing the conflict to clients and allowing them to (a) decline the use of Eventide funds in their entirety or (b) allowing the use of Eventide funds so long as other options were considered and the Eventide fund is determined to be in the best interests of the client.

Martin Wildy, maintains equity ownership in 1620 Investment Advisors, Inc. ("1620"), his former employer. Martin Wildy does not have an active role with the company; however he does maintain a passive ownership (less than 10%) in the firm. Because this is an investment related entity, Abundance attempts to mitigate any potential conflicts by disclosing the relationship to the public.

Martin Wildy is a member in MMJD 2017 Firewheel LLC, Causeway Properties LLC, Mt. Nittany Properities, LLC, West Nittany Group, LLC. Each of these entities are a real estate investment partnership where Martin Wildy has limited involvement and limited time commitment. He receives compensation in the form of distributions from the entities and Abundance mitigates this potential conflict by disclosing it to the public.

Martin Wildy provides consulting to the CFA Institute related to CFA exam grading and the exam development process. Abundance attempts to mitigate any conflict with Martin Wildy's involvement with the CFA Institute by disclosing it to the public.

Martin Wildy does volunteer for ClearWater Conservancy and Friends of Rothrock. He sits on the Board of both non-profit organizations. For ClearWater Conservancy, Martin Wildy is also a member of the Finance and Investment Committee and for Friends of Rothrock, Martin Wildy acts as the Treasurer. Abundance attempts to mitigate any conflict with Martin Wildy's involvement with the non-profit organizations by disclosing his involvement to the public.

Item 5 - Additional Compensation

Martin Wildy may receive compensation as a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Martin Wildy is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

Item 1 - Cover Page

Abundance Wealth Counselors
232 Regent Court
State College, PA 16801
800.253.3760

Derek W. Varner
Wealth Counselor



This brochure supplement provides information about Derek Varner that supplements the Abundance Wealth Counselors brochure. Please contact Lauren Gretchen if you did not receive Abundance's brochure or if you have any questions about the contents of this supplement.

Item 2 - Educational Background & Business Experience

Name: Derek Wade Varner Born: 1985

Post-Secondary Education:

Bachelor of Science/Bachelor of Arts in Finance, University of Pittsburgh, 2007

Professional Designations:

Chartered Financial Analyst⁶ (CFA®), 2013

Business Background:

August 2022 - Present: Abundance Wealth Counselors: Wealth Counselor

September 2021 - Present: Avail Investment Partners, LLC: Partner

February 2021 - Present: Investment Research Partners, LLC: Partner

January 2015 – February 2021: Bucknell University: Associate Director of Investments

June 2008 – December 2014: Aris Wealth Services, Inc.: Portfolio Manager

Item 3 - Disciplinary Information

Derek Varner has no history of disciplinary events.

Item 4 - Other Business Activities

Derek Varner is an investment advisor representative for Investment Research Partners and Avail Investment Partners, of which both are Registered Investment Advisors. Derek Varner receives compensation in the form of salary, bonuses, or partner distributions from Investment

Research Partners and Avail Investment Partners. In an attempt to mitigate this potential conflict, Abundance Wealth Counselors discloses this conflict to the public.

Derek Varner also sits on the investment committee for Centre Foundation in State College, PA. He participates in quarterly meetings and provides opinions and votes on investment portfolio decisions. This is a volunteer position and Derek Varner does not receive any compensation.

Item 5 - Additional Compensation

Derek Varner may receive compensation as a general partner in investment opportunities offered to clients.

Item 6 - Supervision

Derek Varner is supervised by the Chief Compliance Officer, Lauren Gretchen, according to the policies and procedures implemented by the firm. Lauren Gretchen may be reached at 410.995.9041.

Description of Designations

¹Accredited Investment Fiduciary (AIF):

The Accredited Investment Fiduciary (AIF) certification signifies that an individual has a thorough knowledge of and ability to apply the fiduciary practices. To obtain the AIF certification, candidates must complete a training curriculum and then pass an examination. AIF designees are required to adhere to a strict Code of Ethics. In order to maintain and AIF license, designees must complete 6 hours of continuing professional education each year.

²Certified Investment Management Consultant (CIMC):

This designation was issued by the Investment Management Consultants Association. As of December 2003, the CIMC designation is no longer issued. When the designation was issued, its content focused on investment consulting. Current CIMC designees can maintain the designation and are required to adhere to the Institute's Code of Professional Responsibility, Rules and Guidelines for Use of the Marks, and have an acceptable regulatory history as evidence by FINRA Form U-4 or other regulatory requirements. CIMC designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the designation.

³Registered Financial Consultant (RFC):

The Registered Financial Consultant designation is issued by the International Association of Registered Financial Consultants. Candidates must have at least three years of full-time experience as a financial planning practitioner in the field of financial planning or financial services, the required licensing to engage in the financial planning profession, and a sound record of business integrity with no suspension or revocation of any professional designations or licenses. There is no examination for the designation, but individuals must complete 40 hours of continuing education every two years.

⁴Certified Private Wealth Advisor (CPWA):

The CPWA designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on private wealth management topics and strategies for high-net-worth clients. Prerequisites for the CPWA designation are: a Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC ®, CFA®, CFP®, ChFC®, or CPA license; have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and five years of experience in financial services or delivering services to high-net-worth clients. CPWA designees have completed a rigorous educational process that

includes executive education requirements and successful completion of a comprehensive examination. CPWA designees are required to adhere to the Investments & Wealth Institute Code of Professional Responsibility and Rules and Guidelines for Use of the Marks. CPWA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through the Investments & Wealth Institute.

⁵Certified Financial Planner (CFP):

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

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

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

⁶Chartered Financial Analyst (CFA):

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

There are currently more than 138,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

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

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

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter

demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

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

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

To learn more about the CFA charter, visit www.cfainstitute.org



Privacy Policy

The relationship that we have with our clients is what we value above all else. As such, we seek to protect that relationship by maintaining your confidence and trust. We recognize that major factors to that are privacy, confidentiality, and discretion. In order to provide total wealth counseling, we endeavor to know as much about our clients as possible. We have a firm commitment to safeguarding that information and will not disclose it to anyone, unless required by law, directed by you, or necessary to provide you with our services and those of our outside service providers. We will never sell or trade your personal information with anyone.

We will maintain the privacy of your information for the duration of your relationship with Abundance and will advise you of any changes to our privacy policy via electronic communication, at least once annually, or more frequently should any changes occur. Please address any inquiries to the address listed below.

Information We May Collect and Use

We collect personal information about you to provide holistic wealth counseling and other financial services. Personal identifying information that we maintain includes name, address, telephone number, along with financial information and other details about your sources of income, family members, and personal plans. We also collect any other applicable information, so far as it relates to your financial picture.

Information gathered can be obtained by meeting with you in person, by telephone, in writing and electronically. We may also acquire information from other sources, including other companies with whom you do business. While most information is collected when you initially contract for services, additional information is often required to properly administer and manage your accounts, along with providing holistic wealth counseling.

Information We May Disclose

Abundance regards all of your personal and financial information as confidential. In order to provide certain products and services to you, it is necessary to disclose that information to affiliated and non-affiliated third parties. Examples of third parties to which we provide information about you include insurance agencies, custodians, private fund issuers, attorneys, and accountants. We also provide our own service providers, such as Information Technology consultants, accounting platform, and performance providers with your information. In all cases, the information shared with them is done so under a confidentiality agreement and is not to be used for their own marketing purposes.

Should your relationship with Abundance end, we will continue to limit disclosures of your personal information in accordance with our stated Privacy Policy just as we do for those continuing a relationship with Abundance.

Confidentiality and Security

Abundance maintains strict policies and procedures to protect the confidentiality of your information during all stages of your relationship with us. To protect your personal information from unauthorized access and anticipated threats or hazards, we maintain a combination of administrative, technical, and physical safeguards. Access to your information by Abundance personnel is authorized to those individuals having a business need.

Privacy Notice Supplement for California Residents

This notice supplements the Privacy Notice set forth above with respect to specific rights granted under the California Consumer Privacy Act of 2018 (the "CCPA") to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth above in the Privacy Notice. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P ("GLB Rights"), GLB Rights shall apply.

Categories of personal Information We Collect

We have collected some or all of the following categories of personal information from individuals within the last twelve (12) months:

- Identifiers, such as name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and drivers' license or state identification card number);
- Other customer records, such as telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding investors' status under various laws and regulations (including social security number, tax status, income and assets);
- Protected classification characteristics under California or federal law, such as date of birth, citizenship and birthplace;
- Commercial information, such as account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s); and
- Internet or other electronic network activity information, such as information regarding your use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.

Within the last twelve (12) months, we have shared each of the categories of personal information collected with affiliates and third-party service providers as set forth in "Information We Disclose" in the Privacy Notice above, and we collect personal information from the sources set forth in "Information We Collect" in the Privacy Notice above.

Purposes for Collecting Personal Information

We may collect or share the personal information we collect about you for one or more of the following business or commercial purposes:

- performing services to you, including but not limited to:
 - the administrative processes (and related communication) in preparing for the admission of investors to the fund(s);
 - ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the fund;
 - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential investors in the applicable fund;

- ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
- keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
- auditing and verifications related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and
- complying with U.S., state, local and non-U.S. laws, rules and regulations.

WE DO NOT SELL ANY OF THE PERSONAL INFORMATION WE COLLECT ABOUT YOU TO THIRD PARTIES.

Deletion Rightss

You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

Disclosure and Access Rights

You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

No Discrimination

We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

How to Exercise Your Rights

To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request using any of the methods set forth below.

Via email: compliance@abundancellc.com

Telephone: please submit your request and telephone number by email to compliance@abundancellc.com and we will call you between 9 a.m. and 6 p.m. Pacific Time.

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we

may request your investor portal access credentials in order to verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

Our goal is to respond to any verifiable consumer request within forty-five (45) days of our receipt of such request. We will inform you in writing if we cannot meet that timeline. Please contact Lauren Gretchen, the Chief Compliance Officer of Abundance Wealth Counselors at compliance@abundancellc.com with any questions about this Privacy Notice.