

Firm Brochure

(Part 2A of Form ADV)



**141 North Main Street
Cleveland, GA 30528
(706) 865-0121**

**john@bluecreek.net
www.bluecreek.net**

CRD #158853

This brochure provides information about the qualifications and business practices of John Essigman Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at: 706-865-0121 or by email at: john@bluecreek.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about John Essigman Wealth Advisors, LLC is available on the SEC's website at <https://www.adviserinfo.sec.gov/Firm/158853>

May 21, 2020

Item 2: Material Changes

Annual Update

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

Material Changes since the Last Update

We have made the following material changes to our Form ADV Part 2A, also known as the “Brochure” since our last delivery or posting of the Brochure on the SEC’s public website www.adviserinfo.sec.gov.

- Item 5: Revised minimum flat-fee schedule for financial planning.
- Item 10: Revised material relationship and conflicts of interest.
- Item 13: Reporting frequency was corrected.
- Item 15: Made corrections regarding custody of client assets
- Includes other minor editorial changes.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 1: Cover Page

Item 2: Material Changes i

Annual Update i

Material Changes since the Last Update i

Full Brochure Available i

Item 3: Table of Contents ii

Item 4: Advisory Business 1

Firm Description..... 1

Types of Advisory Services..... 1

Client Tailored Services and Client Imposed Restrictions..... 4

Wrap Fee Programs..... 4

Client Assets under Management..... 4

Item 5: Fees and Compensation 4

Method of Compensation and Fee Schedule..... 4

Client Payment of Fees..... 6

Additional Client Fees Charged 6

Prepayment of Client Fees 6

External Compensation for the Sale of Securities to Clients..... 6

Item 6: Performance-Based Fees..... 6

Sharing of Capital Gains 6

Item 7: Types of Clients 7

Description..... 7

Account Minimums..... 7

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss 7

Methods of Analysis..... 7

Investment Strategy 7

Security Specific Material Risks 7

Item 9: Disciplinary Information..... 8

Criminal or Civil Actions 8

Administrative Enforcement Proceedings 8

Self Regulatory Organization Enforcement Proceedings 8

Item 10: Other Financial Industry Activities and Affiliations	9
Broker-Dealer or Representative Registration	9
Futures or Commodity Registration	9
Material Relationships Maintained by this Advisory Business and Conflicts of Interest	9
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest.....	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Code of Ethics Description.....	9
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest.....	10
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest.....	10
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	10
Item 12: Brokerage Practices	11
Factors Used to Select Broker-Dealers for Client Transactions.....	11
Aggregating Securities Transactions for Client Accounts	12
Item 13: Review of Accounts.....	12
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved	12
Review of Client Accounts on Non-Periodic Basis	12
Content of Client Provided Reports and Frequency.....	12
Item 14: Client Referrals and Other Compensation.....	12
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest	12
Advisory Firm Payments for Client Referrals	12
Item 15: Custody	12
Account Statements.....	12
Item 16: Investment Discretion	13
Discretionary Authority for Trading.....	13
Item 17: Voting Client Securities.....	13
Proxy Votes	13

Item 18: Financial Information	13
Balance Sheet	13
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients.....	13
Bankruptcy Petitions during the Past Ten Years.....	13
Item 19: Requirements for State Registered Advisors.....	14
Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).....	14
Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities	14
Supervised Person Brochure.....	15
Brochure Supplement (Part 2B of Form ADV)	16
Principal Executive Officer	16
John P. Essigman, CRD# 4917240	16
Item 2 Educational Background and Business Experience.....	16
Item 3 Disciplinary Information.....	16
Item 4 Other Business Activities	16
Item 5 Additional Compensation	17
Item 6 Supervision	17
Item 7 Requirements for State-Registered Advisors	17

Item 4: Advisory Business

Firm Description

John Essigman Wealth Advisors, LLC, (“Essigman”) was founded in August 2011. John P. Essigman is 100% owner.

Essigman provides personalized confidential financial planning, investment management and solicits for third party money managers to individuals, pension and profit-sharing plans, trusts, estates and charitable organizations. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. Essigman also offers trust services in acting as a trustee for trusts for which the firm serves as investment advisor.

Essigman is a financial planning and investment advisory firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. Investment advice is an integral part of financial planning. In addition, Essigman advises clients regarding cash flow, retirement planning, tax planning and estate planning.

Essigman does not act as a custodian of client assets. An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis, similar document or conversation. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

Types of Advisory Services

Essigman furnishes financial planning and investment advice through consultations.

ASSET MANAGEMENT

Essigman offers discretionary direct asset management services to advisory clients. Essigman will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize Essigman discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. In general, Essigman limits its advice to certain investment products and generally provides advice on; mutual funds, UITs, ETFs, stocks, bonds and REITs.

Employer-Sponsored Retirement Plan Consulting

Essigman provides service to qualified and non-qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Advisor may act as either:

- 1) *Limited Scope 3(21) Fiduciary*. Essigman acts as a limited scope 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using Essigman can help mitigate that plan sponsor's liability by following a diligent process.
- 2) *3(38) Investment Manager*. Essigman can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. Essigman would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

Essigman offers the following services to the Plan and the Plan participants:

1. Fiduciary Services:

- a. Provide non-discretionary and/or discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options.
- b. Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- c. Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- d. Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- e. Meet with Client on a periodic basis to discuss the reports and the investment recommendations.
- f. Provide non-discretionary and/or discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

2. Non-fiduciary Services:

- a. Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands Essigman's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Essigman is not providing fiduciary

advice as defined by ERISA to the Plan participants. Essigman will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

- b. Assist in the group enrollment meetings designed to increase perceived value and/or participation among retirement plan participants.

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

A specific description of the scope of engagement and client deliverables will be outlined in the client engagement agreement.

3. Essigman has no responsibility to provide services related to the following types of assets ("Excluded Assets"):
 - a. Employer securities;
 - b. Real estate (except for real estate funds or publicly traded REITs);
 - c. Stock brokerage accounts or mutual fund windows;
 - d. Participant loans;
 - e. Non-publicly traded partnership interests;
 - f. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
 - g. Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Essigman under this Agreement.

FINANCIAL PLANNING AND CONSULTING

If financial planning services or consulting services are applicable, the client will compensate Essigman on an hourly rate or fixed fee described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through Essigman. Financial plans will be completed and delivered inside of thirty (30) days. Clients may terminate advisory services with thirty (30) days written notice.

EDUCATIONAL SEMINARS

Essigman offers educational seminars or workshops to its clients.

SOLICITOR ARRANGEMENTS

Essigman solicits the services of Third-Party Money Managers to manage client accounts. In such circumstances, Essigman receives solicitor fees from the Third-Party Manager. This is detailed in Item 10 of this brochure.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

Essigman does not participate in wrap fee programs.

Client Assets Under Management

Essigman has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$13,901,254.00	\$0.00	January 2020

Item 5: Fees and Compensation**Method of Compensation and Fee Schedule**

Essigman bases its fees on a percentage of assets under management, hourly fees, and solicitor fees from third party money managers.

ASSET MANAGEMENT

Essigman offers discretionary direct asset management services to advisory clients. The fees for these services will be based on a percentage of Assets Under Management as follows:

- Maximum fee of 2% on the first five million dollars.
- Maximum fee of 1% on any assets over five million dollars.

The annual Fees are negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on the amount of assets managed as of the opening of business on the first business day of each quarter. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Essigman will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees.

EMPLOYER-SPONSORED RETIREMENT PLAN CONSULTING

Based on the nature and scope of services desired by the client, fees charged may be any combination of A) an asset-based fee based on a percentage of the market value of included plan assets, B) flat fee, or C) hourly fee based on the scope of service desired by the client.

- Asset-based fee for employer sponsored retirement plans will not exceed 1% of the plan assets under \$5m and will not exceed .50% of the plan assets over \$5m;
- Flat fee will range may range from \$1,000 and \$25,000; and/or
- Hourly fee of \$350 per hour.

Asset-based fees are billed quarterly in arrears. The initial fee will be based on the market value of the Plan assets as calculated by the custodian or record keeper of the Included Assets on the first business day of the initial fee period. Initial fees for partial quarters are pro-rated. Asset-Based Fees are typically paid by the Plan through deductions from participant accounts but may also be paid directly by Plan Sponsor. If direct payment by the Plan Sponsor is desired, they may choose to pay Essigman directly via an ACH payment or have the amount deducted from another account managed by Essigman. Client must provide written authorization in advance to allow debiting of their account. It is the Client's responsibility to verify the accuracy of fees paid.

For hourly fees, Essigman will invoice the client for actual hours of service provided to the plan. Hourly Fees are invoiced and payable within (10) days of the mailing date of the Invoice.

Flat Fees are billed quarterly in arrears. Initial fees for partial quarters are pro-rated. Flat Fees are typically paid directly by Plan Sponsor. If direct payment by the Plan Sponsor is desired, they may choose to pay Essigman directly via an ACH payment or have the amount deducted from another account managed by Essigman. Client must provide written authorization in advance to allow debiting of their account. It is the Client's responsibility to verify the accuracy of fees paid. Fees may also be deducted directly from participant accounts. Client must provide written authorization in advance to allow debiting of participant accounts.

The compensation of Essigman for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Essigman does not expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Essigman will disclose this compensation, the services rendered, and the payer of compensation. Essigman will offset the compensation against the fees agreed upon under this Agreement.

Clients may terminate portfolio management service at any time with (30) days written notice. For service terminated mid-quarter, the client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees and such notice will be acknowledged in writing by both parties. The fee may be negotiable in very limited circumstances.

FINANCIAL PLANNING AND CONSULTING SERVICES

Financial Planning Services or Consulting Services are available to all clients on an hourly fee of \$350 per hour or a fixed fee of between \$350 and \$25,000. Financial plans or consulting engagements are priced according to the degree of complexity associated with the client's situation. Prior to the financial planning or consulting process the client is provided an estimated plan fee. Client may choose to pay on a quarterly or monthly

basis as outlined in the advisory agreement. Essigman reserves the right to waive financial planning fee if plan is implemented with Essigman.

EDUCATIONAL SEMINARS

Essigman offers educational seminars or workshops to its clients free of charge.

SOLICITOR FEES

Essigman may at times use the services of third-party money managers and receive a solicitor fee for soliciting clients. The client will not pay additional advisory fees to the third-party money manager for these services. This is detailed in Item 10 of this brochure.

Client Payment of Fees

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Financial planning services are billed monthly or quarterly based on the estimate provided to the client at the beginning of the process.

Clients will be billed in accordance with the Third-Party Money Manager Fee Schedule which will be disclosed to the client's prior to signing an agreement.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Essigman, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Essigman does not bill clients prior to services rendered.

External Compensation for the Sale of Securities to Clients

Essigman does not receive any external compensation for the sale of securities to clients.

Item 6: Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Essigman does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Description

Essigman generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, businesses and charitable organizations.

Client relationships vary in scope and length of service.

Account Minimums

Essigman does not require a minimum to open an account, but some Third-Party Money Managers utilized by Essigman may have a minimum to open an account on their platform.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

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

- *Interest-rate Risk*: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk*: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk*: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Essigman nor its employees are registered as a broker dealer or a registered representative of a broker dealer.

Futures or Commodity Registration

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

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

John Essigman is the managing member of John Essigman, LLC. Part of the services of John Essigman, LLC includes, rental property, loan origination, loan underwriting, tax preparation, and consulting. From time to time Essigman (the Advisor) may recommend the services of John Essigman, LLC to its clients. Loan underwriting and origination involves fees that could be paid to lender or originator and present a potential conflict of interest with the fiduciary duties of a registered investment adviser. Essigman always acts in the best interest of the client; including the sale of products or services to advisory clients. Clients are in no way required to implement a loan or other services through any representative of Essigman in their outside capacities.

Licensed Insurance

John Essigman is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Essigman always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of Essigman in such individual's outside capacities.

Trust Services

John Essigman may be named as a client's Power-of-Attorney, Executor, Personal Representative, and/or Trustee. From time to time, Essigman will offer clients these services. Clients should be aware these services provide John Essigman with broad powers and present a potential conflict of interest with the fiduciary duties of a registered investment adviser. Essigman always acts in the best interest of the client; including the sale of services to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of Essigman in such individual's outside capacities.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Essigman may at times utilize the services of Third-Party Money Managers to manage client accounts. In such circumstances, Essigman will share in the Third-Party asset management fee. This situation creates a conflict of interest. However, when referring

clients to a third-party money manager, the client's best interest will be the main determining factor of Essigman. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Essigman's Investment Advisory Agreement.

This relationship will be disclosed to the client in each contract between Essigman and Third-Party Money Manager. Essigman does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial Essigman's Investment Advisory Agreement to acknowledge receipt of Third-Party fee Schedule and required documents including Form ADV Part 2 disclosures.

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

Code of Ethics Description

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

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

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

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

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

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Essigman and its employees do not recommend securities to clients in which we have a material financial interest.

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

Essigman and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Essigman with copies of their brokerage statements.

The Chief Compliance Officer of Essigman is John P. Essigman. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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

Essigman does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Essigman with copies of their brokerage statements.

The Chief Compliance Officer of Essigman is John P. Essigman. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Essigman may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. Essigman will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Essigman relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Essigman.

- *Directed Brokerage*

In circumstances where a client directs Essigman to use a certain broker-dealer, Essigman still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: Essigman's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients, and conflicts of interests arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may

constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- ***Soft Dollar Arrangements***

Essigman utilizes the services of custodial broker dealers. Economic benefits are received by Essigman which would not be received if Essigman did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Essigman's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when the firm receives soft dollars. This conflict is mitigated by the fact that the Investment Advisor Representatives have a fiduciary responsibility to act in the best interest of his clients and the services received are beneficial to all clients.

Aggregating Securities Transactions for Client Accounts

Essigman does not aggregate transactions for Client accounts at this time.

Item 13: Review of Accounts

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

Account reviews are performed quarterly by John P. Essigman, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the custodian at which the client's account is held. Client receives confirmations of each transaction in account from the Custodian.

Item 14: Client Referrals and Other Compensation

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

Essigman receives solicitor fees from third party money managers for the referral of clients.

This situation creates a conflict of interest because the firm and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by the firm. However, when referring

clients to a third-party money manager, the client's best interest will be the main determining factor of the firm and its representatives.

Advisory Firm Payments for Client Referrals

Essigman may enter into "Solicitor/Finder" relationships. These individual solicitors refer our services to the public. Essigman pays a referral fee to the solicitor or finder based on a written agreement. Solicitor/finders will also be appropriately registered under federal and state securities laws where applicable. Client receives all related agreements and disclosures prior to or at the time of entering into an Advisory Agreement with Essigman.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any performance report statements prepared by Essigman or the Third-Party Money Managers.

Essigman is deemed to have indirect custody solely because advisory fees are directly deducted from client's accounts by the custodian on behalf of Essigman.

John Essigman offers trust services in acting as a trustee for trusts, executor, power-of-attorney, or is an officer of a private company for which the firm serves as investment advisor. In its capacity as trustee for trust clients, executor, power-of-attorney, or an officer of a client's corporate account, Essigman will have custody over those client, trust or corporate accounts. All jurisdictional requirements will be followed by Essigman concerning custody.

Item 16: Investment Discretion

Discretionary Authority for Trading

Essigman accepts discretionary authority to manage securities accounts on behalf of clients. Essigman has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, Essigman will consult with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Essigman does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Item 17: Voting Client Securities

Proxy Votes

Essigman will vote proxy on behalf of clients when Essigman has been provided with a proxy vote letter-of-instruction to vote in a specific manner.

When assistance on voting proxies is requested, Essigman will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required. Essigman does not serve as a custodian for client funds or securities and Essigman does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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

Essigman has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither Essigman nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

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

On occasion an issuer of securities may provide marketing support. Essigman follows its fiduciary responsibility and does not allow any conflict of interest between the marketing support by an issuer of securities and Essigman's recommendations.

Supervised Person Brochure

Part 2B of Form ADV

John P. Essigman

CRD# 4917240

**John Essigman Wealth Advisors, LLC
141 North Main Street
Cleveland, GA 30528**

**(706) 865-0121
john@bluecreek.net**

This brochure supplement provides information about John P. Essigman and supplements the John Essigman Wealth Advisors, LLC's brochure. You should have received a copy of that brochure. Please contact John P. Essigman if you did not receive John Essigman Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about John P. Essigman (IARD #4917240) is available on the SEC's website at

<https://www.adviserinfo.sec.gov/Individual/4917240>

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer

John P. Essigman, CRD# 4917240

- Year of birth: 1961
-

Item 2 Educational Background and Business Experience

Educational Background:

- College for Financial Planning; M.S. -Personal Financial Planning; 2020
- Saint Leo University; B.A.-Business; 2003
- El Paso Community College; A.A.S.-Computer Programming; 1983
- El Paso Community College; A.A.S.-Computer Operations; 1983

Business Experience:

- John Essigman Wealth Advisors LLC; Managing Member; 8/2011 to Present
 - John Essigman LLC; Managing Member 9/2008 to Present
 - Gradient Securities, LLC; Registered Representative; 8/2011 to 12/2012
 - Money Concepts Capital; Registered Representative; 9/2008 to 8/2011
-

Item 3 Disciplinary Information

None to report

Item 4 Other Business Activities

John P. Essigman is the managing member of John Essigman, LLC. Part of the services of John Essigman LLC includes, rental property, loan origination, loan underwriting, tax preparation, consulting (not investment related). From time to time Essigman (the Advisor) may recommend the services of John Essigman, LLC to its clients. Loan creation involves fees that could be paid to lender or originator and present a potential conflict of interest with the fiduciary duties of a registered investment adviser. Essigman always acts in the best interest of the client; including the sale of fee-based products to advisory clients. Clients are in no way required to implement a loan or other services offered by or through any representative of Essigman in their outside capacities. John P. Essigman is an officer of a private corporation which is also a client. None of the services or products of this company will be offered to advisory clients.

John Essigman is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. John Essigman Wealth Advisors, LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of John Essigman Wealth Advisors, LLC in such individual's outside capacities.

John Essigman may be named as a client's Power-of-Attorney, Executor, Personal Representative, and/or Trustee. From time to time, he will offer clients these services. Clients should be aware these services provide John Essigman with broad powers and could conflict with the fiduciary duties of a registered investment adviser. John Essigman Wealth Advisors, LLC always acts in the best interest of the client. Clients always have

the right to decide whether or not to utilize the services of any representative of John Essigman Wealth Advisors, LLC in such individual's outside capacities.

Item 5 Additional Compensation

John P. Essigman receives no additional compensation from outside parties for providing advisory services to clients.

Item 6 Supervision

John P. Essigman is the sole owner of John Essigman Wealth Advisors, LLC and therefore he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Item 7 Requirements for State-Registered Advisors

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None