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Trasatti Wealth Planning, LLC

Dated: March 27, 2019

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This Brochure provides information about the qualifications and business practices of **Trasatti Wealth Planning, LLC**. If you have any questions about the contents of this Brochure, please contact us at **(410) 244-6222** or gtrasatti@trasattiw.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Trasatti Wealth Planning, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about **Trasatti Wealth Planning, LLC** also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

The firm does not have any material changes to report since its last annual amendment update which was on March 22, 2018.

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Item 4 – Advisory Business

Trasatti Wealth Planning, LLC (the “**Adviser**”) became registered as an Investment Advisor in June 2006. Its principal owner is **Gabriel Trasatti**. **Adviser** specializes in two broad types of advisory services, comprehensive financial planning and investment management.

Comprehensive financial planning is a disciplined process of organizing and managing all aspects of your financial life in order to meet your financial objectives. It helps you create a roadmap to guide you through your financial life. As your needs and situations change over time, adjusting your planning strategies enables you to stay on track through goal-oriented results. The typical areas of financial planning include: Asset Allocation Analysis, Investment Selection Analysis, Retirement Planning, Net Worth Analysis, Cash Flow Analysis, Risk Management, Estate Planning, Education Planning, Tax Planning, and other related financial areas depending upon your unique circumstances.

The financial planning process starts with obtaining an understanding of your financial situation and goals. **Adviser** does this through a variety of methods such as in person meetings, telephone conversations, a secured online questionnaire, and/or reviewing relevant documents furnished by you. Once **Adviser** obtains the necessary information, **Adviser** will analyze it, develop recommendations, and present these recommendations to you. All advice is custom tailored based on your financial profile.

For clients who are looking for a more comprehensive wealth planning approach, **Adviser** offers professional investment management services in addition to its financial planning services. **Adviser** offers investment management services on both a discretionary and non-discretionary basis depending on the client’s individualized needs. As of December 31, 2018, **Adviser** manages \$26,802,997 of assets on a discretionary basis and \$1,861,527 on a non-discretionary basis. Investment management is the professional management of assets using various securities that are designed to provide an investor with a portfolio that meets their risk levels and their financial objectives. Each portfolio designed by **Adviser** is custom tailored for its clients, and may include restrictions on investing in certain securities or types of securities if requested by the client. **Adviser** works with its clients to develop an Investment Policy Statement (IPS). The IPS provides a general guideline as to how **Adviser** will allocate the accounts among various assets classes, investment selections, and other unique requirements or restrictions of the accounts.

Adviser does not provide specific tax or legal advice and encourages clients to seek specialized advice from their tax and/or legal counsel. **Adviser** does not prepare tax returns or draft legal documents for its clients. The implementation of advice or strategies

proposed by **Adviser** may impact a client's tax situation or result in the need to seek the additional resources of a tax professional or legal adviser. **Adviser** is not a substitute for a client's tax adviser or legal counsel, and clients should always consult with their own professional advisers before implementing any advice or strategies proposed by **Adviser**.

Item 5 – Fees and Compensation

The fees charged for our Financial Planning and Asset Management Services are subject to negotiation depending upon a number of factors, including, but not limited to the complexity of the client's financial situation, the client's total net worth, and the scope of the planning services requested. **Adviser** may also, in its sole discretion, waive or reduce its fee at any time. The specific manner in which fees are charged by **Adviser** is established in a written agreement with **Adviser**. **Adviser** will bill clients in arrears.

Financial Planning Fees

Adviser offers three (3) different fee structures for financial planning services; fixed fee, hourly fee, or monthly retainer fee. These fee structures do not include professional investment management services, which is covered under a different fee structure that is based upon assets under management.

The standard fixed fee for a comprehensive financial plan is \$10,000 (Ten Thousand Dollars) and is generally for a six (6) month term. The client may choose to engage **Adviser** for additional financial planning services once the terms of the original engagement have been met. Additional fees will be based on the fee structures offered by **Adviser** that best fits the client's needs at that time. The client may choose to have this fee billed on a monthly or quarterly basis in arrears.

The standard hourly fee for comprehensive financial planning services is \$200 (Two Hundred Dollars) per hour. This fee includes ongoing financial planning services and is generally billed monthly based upon services performed. The minimum increment for billing is 15 minutes.

The standard retainer fee for comprehensive financial planning services is \$500 (Five Hundred Dollars) per month. This fee includes ongoing financial planning services and is generally billed monthly in arrears. **Adviser** requires at least a three (3) month term for its standard retainer fee.

Investment Management Fees

Adviser will generally bill its fees on a quarterly basis based upon the market value of the client's managed assets on the last business day of the previous quarter. Clients may also elect to be billed directly for fees or to authorize **Adviser** to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable.

Adviser's annual investment management fee shall be a percentage of assets under management, and shall generally be in accordance with the following schedule:

Assets Under Management	Fee Imposed
First \$250,000.99	1.20%
the next \$250,001.00 up to \$1,000,000.99	1.00%
the next \$1,000,001.00 up to \$2,500,000.99	0.80%
the next \$2,500,001.00 and above	0.60%

In performing both its financial planning services and investment management services, **Adviser** shall not be required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely thereon. Clients are under no obligation to implement **Adviser** recommendations or pursue any additional services offered by **Adviser** or by other professionals **Adviser** recommends. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from **Adviser**. Moreover, each client is advised that it remains the client's responsibility to promptly notify **Adviser** if there are ever any changes in the client's financial situation or investment objectives for the purpose of reviewing/evaluation/revising its previous recommendations or services. Clients may terminate this service without penalty within five (5) business days after entering into a written agreement, in which case the client shall receive a full refund of all fees paid if any.

Adviser's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges

imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to **Adviser's** fee, and **Adviser** shall not receive any portion of these commissions, fees, and costs.

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

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

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

Item 7 – Types of Clients

Adviser provides financial planning services and investment management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and trust programs.

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

Adviser custom designs all investment portfolios based on a client's unique financial profile, circumstances, and objectives. **Adviser** may use various investment strategies that may include: long term purchases (securities held at least a year), short term purchases (securities sold within a year), and trading (securities sold within 30 days).

Adviser will work with a client to select a combination of various asset classes that is appropriate for the client. **Adviser** will select asset classes in the context of the whole portfolio, not in isolation. This means that some asset classes may be highly volatile, which, in isolation, may not appear to be suitable for a certain level of risk tolerance. However, these asset classes when considered with the balance of the portfolio should provide for a well-diversified portfolio. Likewise, some asset classes may appear to be too conservative and lack growth potential.

Adviser will select specific investment securities that, in general, will correlate to the combination of asset classes recommended for a customized portfolio. **Adviser** will base this selection on both quantitative as well as qualitative analysis using various research

tools. In general, **Adviser** will use various mutual funds or exchange traded funds (ETF) for a client's portfolio. It is important for a client to carefully read the prospectus and other disclosure documents provided by the custodian and mutual fund company to fully understand the risk of loss. **Adviser** may also use various individual fixed-income securities, such as corporate bonds or government bonds, where appropriate. Directly investing in individual bonds may carry unique risks including default by the issuer or a downgrade of the issuer's credit rating which may result in a significant decrease in value or loss.

Adviser monitors the performance of the securities selected for a portfolio on an ongoing basis. Periods of underperformance are not unusual or alarming for an individual security or an asset class as a whole. **Adviser's** intent in monitoring performance is to ensure that 1) the client continues to be on track to achieve its goals, 2) over a reasonable period the investments produce acceptable return in relation to risk, 3) securities contribute to the portfolio as anticipated, and 4) the portfolio continues to feature an acceptable level of risk.

At times, outperformance of some securities and underperformance of others may result in the need to rebalance a portfolio to maintain a comfortable level of risk. **Adviser** performs an analysis, at least quarterly, to determine if an individual portfolio is in the acceptable ranges for each asset class. When one of the asset classes is out of the targeted range (usually 20% from its target weighting), **Adviser** will generally rebalance the portfolio to bring it back into the targeted range while also attempting to reasonably minimize any tax consequences and transaction fees. **Adviser** anticipates that the rebalancing should happen once every 6 to 12 months, but in volatile markets it may occur more frequently.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of **Adviser** or the integrity of **Adviser's** management. **Adviser** has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Registered investment advisers are required to disclose all material other financial industry activities and affiliations that would be material to your evaluation of **Adviser**. **Adviser** has no information applicable to this Item.

Item 11 – Code of Ethics

Adviser has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at **Adviser** must acknowledge the terms of the Code of Ethics annually, or as amended.

Adviser anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which **Adviser** has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which **Adviser**, its affiliates and/or clients, directly or indirectly, have a position of interest. **Adviser's** employees and persons associated with **Adviser** are required to follow **Adviser's** Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of **Adviser** and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for **Adviser's** clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of **Adviser** will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of **Adviser's** clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some

circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between **Adviser** and its clients.

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

Adviser's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting **Gabriel Trasatti**.

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

Item 12 - Brokerage Practices

Adviser does not have any affiliation with product sales firms. **Adviser** is not affiliated with the brokerage firm. Broker does not supervise the advisor, its agents or activities.

Clients are under no obligation to act on the financial planning recommendations of Adviser. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but

that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

Brokerage Recommendations

If we assist you in the implementation of any recommendations, Shareholder Services Group clearing through Pershing, LLC will be used as the broker/dealer for your account.

Directed Brokerage

Clients are allowed to select the broker-dealer that will be used for their accounts. Clients directing the use of a particular broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction. Under a client-directed brokerage arrangement, clients may receive less favorable prices than would otherwise be the case if the client had not designated a particular broker/dealer or custodian. Directed brokerage account trades are generally placed by Adviser after effecting trades for other clients of Adviser. In the event that a client directs Adviser to use a particular broker or dealer, Adviser may not be authorized to negotiate commissions and may be unable to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct Adviser to use a particular broker or dealer versus clients who do not direct the use of a particular broker or dealer.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Adviser does not have a soft dollar agreement with a broker-dealer or a third-party.

Handling Trade Errors

Adviser has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Adviser to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Adviser if the error is caused by Adviser. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. Adviser may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

Adviser will never benefit or profit from trade errors.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Adviser believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Adviser uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. Adviser will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which Adviser or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

Item 13 – Review of Accounts

For those advisory clients who have engaged **Adviser** for investment management services, a continuous review shall be undertaken. All accounts will be reviewed at least quarterly by **Gabriel Trasatti**. The review includes the performance in correlation with the appropriate benchmarks and the individual client's objective. Each client will receive a quarterly client summary report that provides key data on the client's accounts, including a broad asset allocation on an aggregate basis, performance percentages, account level activity, and management fees. The client may choose to have these reports delivered electronically or in hard copy. Clients are advised to promptly notify **Adviser** if there are ever any changes in their financial situation or investment objectives for the purpose of evaluating **Adviser's** previous recommendations and/or services.

For those advisory clients who do not engage **Adviser** for investment management services, **Gabriel Trasatti** will review the accounts as requested by the client or review the accounts on a reasonable periodic basis in order to provide ongoing financial planning services to the client.

Item 14 – Client Referrals and Other Compensation

Adviser does not receive any economic benefit from non-client persons or organizations for client referrals. **Adviser** does not directly or indirectly compensate for client referrals any person or organization who is not a supervised person.

Item 15 – Custody

All assets are held at qualified custodians, who provide account statements directly to clients at their address of record at least quarterly. An investment adviser who directly deducts fees from Clients' accounts is deemed to have custody of clients' assets. To comply with current regulations, **Adviser** obtains written authorization from the client to deduct advisory fees from the account held with a qualified custodian. Each time a fee is directly deducted from a client account, **Adviser** concurrently sends the qualified custodian notice of the amount of the fee to be deducted from the client's account, and sends the client an invoice itemizing the fee including the formula used to calculate the fee, the amount of assets under management upon which the fee is based, and the time period covered by the fee. The qualified custodian sends statements, on at least a quarterly basis, to clients showing all disbursements for the custodian account, including the amount of the advisory fees. **Adviser** is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

Adviser urges clients to carefully review such statements and compare such official custodial records to the account statements and information that we may provide to clients. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Adviser usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Before assuming discretionary authority, client must sign an Investment Advisory Agreement and new account application that explicitly provides Adviser with investment discretion.

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

Investment guidelines and restrictions must be provided to **Adviser** in writing.

Item 17 – Voting *Client* Securities

As a matter of firm policy and practice, **Adviser** does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. **Adviser** and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. **Adviser** may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about **Adviser's** financial condition. **Adviser** has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Registered investment advisers are required in this Item to identify each principal executive officer and management person for **Adviser**. **Gabriel Trasatti** is the sole executive officer and management person. Refer to Part 2B of Form ADV, Brochure Supplement, for additional disclosure information on **Gabriel Trasatti**.

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This Brochure Supplement provides information about Gabriel Trasatti that supplements the Trasatti Wealth Planning, LLC Brochure. You should have received a copy of that Brochure. Please contact Gabriel Trasatti if you did not receive Trasatti Wealth Planning, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2- Educational Background and Business Experience

Gabriel Trasatti

Birth Year: 1972

Education:

Bachelor of Business Administration (BBA), Accounting
James Madison University, 1994

Employment History:

- Trasatti Wealth Planning, LLC, Principal, October 2004 to present
- Pinnacle Advisory Group, Inc., Investment Advisor Representative, April 2012 to January 2013
- Levin Financial Strategies, Investment Advisor Representative, January 2006 to September 2006 and July 2005 to December 2005

Professional Designations:

Certified Public Accountant (CPA) - CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Personal Financial Specialist (PFS) - The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial

Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Gabriel Trasatti does not engage in Other Business Activities. No information is applicable to this Item.

Item 5- Additional Compensation

Gabriel Trasatti does not receive any additional compensation from non-client persons or entities. No disclosure information is applicable to this Item.

Item 6 - Supervision

Gabriel Trasatti is the sole owner and adviser of Trasatti Wealth Planning, LLC, and adheres to written supervisory guidelines to maintain compliance with Investment Adviser Supervision regulations. Supervisory guidelines are maintained in the Adviser's Compliance Manual, electronic compliance folders, client relationship management system, and portfolio management system.

Item 7- Requirements for State-Registered Advisers

Gabriel Trasatti has not had an award or otherwise been found liable in any arbitration claim or any civil, self-regulatory organization, or administrative proceeding. Gabriel Trasatti has not been the subject of a bankruptcy petition. No disclosure information is applicable to this Item.