

Enso Wealth Management, LLC

Item 1: Cover Page

FORM ADV PART 2A

March 23, 2022

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This brochure provides information about the qualifications and business practices of Enso Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at (707) 981-7584 or email joe@ensowealth.com. The information in this brochure has not been approved or verified by the U. S. Securities and Exchange Commission or by any other state or federal regulatory authority. Additional information about Enso Wealth Management also is available at www.ensowealth.com or on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of Enso Wealth Management, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

This section of our brochure will reflect any material changes that occurred subsequent to our Firm's last annual updating amendment on March 2, 2021.

Since the last filing, we have updated this brochure to describe two private funds in which two of our advisory personnel have a material interest:

- TRAMF21, LP is a private equity fund that will invest in a diversified portfolio of multi-family real estate projects. William DeMar is a manager of TRAMF21, LP's general partner, TRABD, LLC.
- Fortune Bridge Capital Fund I, LLC is a multi-manager real estate fund that was created to align accredited investors with institutional and local real estate managers across the US. Joseph Sweis is the founder & CEO of Fortune Bridge Capital Fund I, LLC.

Whenever you would like to receive a complete copy of our brochure, please contact us by telephone at 707-981-7584 or by email at compliance@ensowealth.com.

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Item 4: Advisory Business

Enso Wealth Management, LLC is the successor firm to DeCota Wealth Management, LLC, doing business as Enso Wealth Management (“Enso Wealth” or the “Firm”). Our firm is a limited liability company formed in the State of California. Enso Wealth, through its predecessor firm, has been in business as an investment adviser since 2014. The Firm is owned by its Members, James C. DeCota, Noah B. Jacobson, William G. DeMar, Taylor M. Greenleaf, Andrew E. Thompson, Joseph K. Stern, David R. Jones, Joanna C. Aiken, Toussaint Bailey, Mark Clure, and Stephen Sear. The Chief Compliance Officer is Joseph K. Stern.

Regulatory Assets Under Management

Enso Wealth manages approximately \$1,511,908,418 on a discretionary basis and \$291,082,297 on a non-discretionary basis as of December 31, 2021.

Description of the Types of Advisory Services We Offer

Comprehensive Portfolio Management:

Enso Wealth provides individuals and other types of clients with a wide array of investment advisory services. Enso Wealth offers individualized investment advice to clients utilizing our Comprehensive Portfolio Management service. Additionally, we offer general investment advice to clients utilizing our Financial Planning & Consulting and Pension Consulting services.

Our Comprehensive Portfolio Management service encompasses asset management as well as providing financial planning/financial consulting to clients. It is designed to assist clients in meeting their financial goals using financial investments. We conduct at least one, but sometimes more than one meeting (in person if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the client. We may propose an investment portfolio, consisting of exchange traded funds (“ETFs”), mutual funds, individual stocks or bonds, or other investments, including unregistered securities. Upon the client’s agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client’s portfolio. Once the relevant accounts are under our management, we review such accounts on a regular basis and at least quarterly. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client’s investments.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Restrictions would be limited to our Comprehensive Portfolio Management service. We do not manage assets through our Financial Planning & Consulting and Pension Consulting services.

Financial Planning & Consulting:

We provide a variety of financial planning and consulting services to individuals, families and other clients regarding the management of their financial resources based upon an analysis of the client's current situation, goals, and objectives. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Cost Segregation Study, Corporate Structure, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Policy Review, Lines of Credit Evaluation, Business and Personal Financial Planning.

Our written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. For written financial planning engagements, we provide our clients with a written summary of their financial situation, observations, and recommendations. For financial consulting engagements, we usually do not provide our clients with a written summary of our observations and recommendations as the process is less formal than our planning service. Plans or consultations are typically completed within six (6) months of the client signing a contract with us, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

Typically, clients engaging the firm to provide financial planning or financial consultation services are required to enter into a separate written agreement setting forth the terms and conditions of the planning engagement and describing the scope of the services to be provided. Financial planning clients need not necessarily become investment management clients of the firm.

Enso Wealth does not make any representation that these products and services are offered at the lowest available cost and the client may be able to obtain the same products or services at a lower cost from other providers. However, the client is under no obligation to accept any of the recommendations of Enso Wealth or use the services of Enso Wealth in particular. Implementation of the recommendations will be at the discretion of the client.

Use of Sub-Advisers

Enso Wealth may delegate certain administrative and/or investment oversight duties to a "Sub-Advisor", pursuant to a sub-advisory agreement entered on behalf of Enso Wealth. As investment Advisor to the client's account, Enso Wealth is responsible for recommending, selecting and monitoring a portfolio using a combination of internal, and third-party managed strategies. The strategies are implemented in the client's custodial account using stocks, bonds, mutual funds

("Funds"), exchange-traded funds ("ETFs"), and other securities. Each client's individual investment strategy is tailored to their specific needs and may include some or all the previously mentioned securities. Without limiting the generality of the foregoing, Sub-Adviser will oversee and coordinate with Enso Wealth, as necessary, to take all necessary action to buy, sell or otherwise trade any securities and other assets in a client's account in a manner that is consistent with the investment guidelines as established by client. Although Enso Wealth has delegated responsibility for day-to-day portfolio management (including authority over security-level decisions) to the Sub-Adviser, Enso Wealth will monitor the Sub-Adviser's performance with respect to their management of client assets and retains the authority to engage or terminate the Sub-Adviser. Any decision to engage or terminate the Sub-Adviser will be based upon continued suitability and performance of the Sub-Adviser in relation to its management of client assets.

A more detailed description of the specific services available from the Sub-Adviser can be found in the Sub-Adviser's current Form ADV Part 2A. Clients are encouraged to carefully review the Sub-Adviser's Form ADV Part 2A disclosure brochure for service level, fee, conflict and professional background information applicable to the Sub-Adviser.

It should be noted that differences exist in both the product solutions available and the fees and expenses charged to the client dependent on the pricing schedule and custodian selected by the Wealth Manager.

Enso Wealth Custom Portfolio Platform (ECPP)

Enso Wealth provides certain clients with a customized multi-manager portfolio solution designed to meet the specific needs of clients. Strategies in the Program are managed and may be implemented through Turn-Key Asset Management Platforms (TAMPs). Enso Wealth Managers that utilize the unrelated third-party asset managers match the available strategies to your personal financial situation. Client restrictions on investing may preclude your Wealth Manager from choosing any of the Program models for their clients' portfolios. Third Party Asset Managers working on the Enso Custom Portfolio Platform are referred to as "Sleeve Managers" as the strategy itself is deployed inside the clients existing brokerage account in a segregated sleeve. This approach limits the need for the client to set up multiple brokerage accounts.

Turn Key Asset Management Programs (TAMP)

A TAMP facilitates investment selection and management, allowing Enso Wealth to delegate back-office functions such as investment research, manager due diligence, portfolio construction, rebalancing, trading, reconciliation, performance reporting, tax optimization and statement preparation in order to focus more on clients, planning needs, client strategy, and servicing existing accounts. Many TAMP provider firms provide these capabilities on a customized managed account platform, permitting Enso Wealth to access investment managers and strategies in a client's existing account, rather than creating additional accounts and paperwork and processes. From time to time Enso Wealth may recommend the services of a TAMP to facilitate these services. You will receive the TAMP's Form ADV Part 2, TAMP program notice, and addendums that describe any fees and services recommended.

Enso Wealth has engaged Axxcess Wealth Management ("Axxcess") and the Axxcess Platform to provide TAMP services to Enso Wealth. Axxcess serves as a sub-advisor to the program to

provide administrative, trading, allocation, and reporting services to Enso Wealth and its clients. Third Party Asset Managers working on the Enso Custom Portfolio Platform are referred to as “Sleeve Managers” as the strategy itself is deployed inside the clients existing brokerage account in a segregated sleeve. This approach limits the need for the client to set up multiple brokerage accounts. Axxcess serves in this capacity under agreement with Enso Wealth and can be terminated at any time. For more information about Axxcess and its services, please refer to the Axxcess Wealth Management form ADV Part 2A: <https://adviserinfo.sec.gov/firm/summary/164081>.

Pension Consulting:

Enso Wealth provides pension consulting services to employer plan sponsors on an ongoing basis. Generally, such pension consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure and participant education.

All pension consulting services shall be in compliance with the applicable state law(s) regulating pension consulting services. This applies to client accounts that are pension or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and we accept appointments to provide our services to such accounts, we acknowledge that we are a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to the provision of services described in section 1 of the Pension Consulting Agreement).

Held Away Account Services:

We provide an additional service for accounts not directly held in our custody but where we do have discretion and may leverage an Order Management System to implement asset allocation or rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, 529 plans, variable annuities, and other assets we do not custody. We regularly review the current holdings and available investment options in these accounts, monitor the accounts, rebalance and implement our strategies as necessary.

Participation in Wrap Fee Programs

We act as the investment adviser to a wrap fee investment program, but solely with respect to clients that were acquired as part of a prior acquisition. Please refer to our separate Form ADV Part 2A Appendix 1 (our wrap fee program brochure).

Private Funds

From time to time and when appropriate for a particular client, we will offer private fund investments to our advisory clients (each, a “Fund” and collectively, the “Funds”). As of the date of this brochure, two of our advisory personnel have a material interest in two Funds: TRAMF21, LP (“TRAM”) and Fortune Bridge Capital Fund I, LLC (“Fortune Bridge”).

William DeMar is a 50% owner of TRABD, LLC, which serves as the General Partner for TRAM, a private equity fund that invests in a diversified portfolio of multi-family real estate projects in growing areas of the United States, focusing on the multi-family real estate class. The investment objective is to achieve returns relative to risk by investing in a diversified portfolio of multi-family real estate projects in growing areas of the US.

Joseph Sweis is the founder & CEO of Fortune Bridge, a multi-manager real estate fund that was created to align accredited investors with institutional and local real estate managers across the US. In addition to pooled investment vehicles, Fortune Bridge will target investments with current income and potential for growth through property improvements and repositioning.

To the extent clients are solicited or referred to invest in either Fund by advisory personnel of Enso Wealth, a conflict of interest exists due to the additional compensation that Mr. DeMar or Mr. Sweis shall earn from such investment through TRAM and Fortune Bridge, respectively. Due to the material financial interest that Mr. DeMar and Mr. Sweis have in TRAM and Fortune Bridge, respectively, Enso Wealth addresses the attendant conflict of interest by providing disclosure in this brochure, by providing further disclosure in each Fund's offering documents, and by only making a recommendation to invest in a Fund as a fiduciary when such Fund investment is believed to be in a client's best interests. Clients are under no obligation to invest in any private fund, including the Funds.

Clients should also understand that investments in private funds are substantially different than investments made through managed accounts, in that private funds (including the Funds) tend to be subject to additional and unique risks, liquidity and redemption restrictions, as well as additional fees and costs (the fees and expenses associated with an investment in either Fund will generally be higher than the fees and expenses that a client would otherwise pay to Enso Wealth in consideration of the services described above). Please refer to Item 8 of this brochure, as well as each respective Fund's offering documents, for further information. Clients of Enso Wealth should conduct their own independent analysis of each Fund to determine whether an investment in such Fund meets their investment objectives and risk tolerance prior to making an investment.

Item 5: Fees & Compensation

How We Are Compensated for Our Advisory Services

Comprehensive Portfolio Management:

For our comprehensive portfolio management services, we charge a fee based on a percentage of the market value of the investments held in each client's account. Assets in the account are included in the fee assessment unless specifically identified in writing for exclusion. The annual management fee is prorated and billed quarterly, in advance. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. If assets are deposited into or withdrawn from a client's account after the inception of a billing period and depending upon the timing or size of such withdrawal or deposit, the fee payable with respect to such assets may not necessarily be adjusted or prorated based on the number of days remaining in the billing period.

The quarterly fee is computed on the last day of the billing period by determining the market value of the account assets as follows: (a) for marketable securities: the current market value

provided by the client’s custodian; (b) for securities for which there exists no active market (such as real estate, gas and oil, or other illiquid securities), by using such information as Enso Wealth shall in good faith deem relevant to determine the value thereof, or in the absence of such information, at cost; and (c) for cash or equivalents, at dollar value.

Unless otherwise negotiated between the Firm and the client, the annual fee is calculated according to the following standard fee schedules:

Individual, Non-ERISA 401k Accounts:

Assets Under Management	Annual Percentage of Assets Charge
First \$1,000,000	1.40%
Next \$4,000,000	1.10%
\$20,000,000+	Negotiable

ERISA 401(k) Plans:

Assets Under Management	Annual Percentage of Assets Charge
\$0 to \$999,999	0.75%
\$1,000,000 to \$3,000,000	0.50%
\$3,000,000 to \$5,000,000	0.40%
Over \$5,000,000	Negotiable

For 401(k) Plans with less than \$250,000 in assets, we charge a \$2,000 flat fee.

Our firm’s fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Our fees are generally not negotiable. Fees will be deducted from your managed account. In rare cases, we will agree to direct bill clients. As part of this process, you understand and acknowledge the following:

- Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the assets and all disbursements in your account, including the amount of the advisory fees paid to us;
- You provide authorization permitting us to be directly paid by these terms. We send our invoice directly to the custodian; and
- If we send a copy of our invoice to you, it will include a legend urging you to compare information provided in our statement with those from the qualified custodian.

Clients customarily authorize Enso Wealth to deduct its quarterly investment advisory fee directly from their custodial account. This authorization is granted under the terms of the client’s signed investment management agreement and the client’s instructions to the custodian. The firm sends an itemized fee invoice showing the fee calculation to each client at the time it invoices the client’s custodian to deduct and transmit its fees. It is the client’s responsibility to verify the accuracy of the fee calculation, as the custodian will not determine whether the fee is properly calculated.

In rare cases, at Enso Wealth's discretion, clients may arrange to pay their fee directly to the firm. Under this arrangement, payment is due upon client's receipt of our billing invoice.

In certain cases, clients may request that Enso Wealth purchase, maintain, or consolidate preexisting or other securities positions in custodial accounts maintained with the firm that are not consistent with the firm's investment strategy. In such cases, we do not charge a management fee on such assets, with the specific understanding that these are non-managed assets for which client is responsible for determining the suitability of maintaining such a position. The firm will not sell such securities without specific written instructions from the client.

To the extent that a client authorizes the use of margin, and margin is thereafter employed, the market value of the client's account and corresponding fee payable by the client to the firm will be increased. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin, clients authorizing margin are advised of the conflict of interest whereby the client's decision to employ margin will typically increase the management fee payable to the firm. Accordingly, the decision to employ margin is left to the sole discretion of client. Clients employing margin are advised that the margin balance is not deducted when calculating the quarterly advisory fee.

In the case of valuing non-liquid asset classes, our firm relies on valuations provided in statements received directly from third party managers. The financial statements associated with certain illiquid securities are audited on an annual basis, and valuation adjustments resulting from the audits are reflected in subsequent fee invoices. In connection with assets invested in private real estate funds, it may be the practice of the funds to hold assets at their original cost until the point where there is an action causing them to adjust this basis, such as an asset sale.

Financial Planning & Consulting:

We charge on a flat fee basis for financial planning and consulting services. Fees are based on the scope and complexity of our engagement with you. Our flat fees generally range from \$3,500 to \$50,000. We do not require a retainer and the estimated financial planning or consulting fee we quote is due upon engagement.

Use of Sub-Advisers:

Sub-advisers, such as a third-party money manager may charge you an additional management fee that is separate and distinct from any management fee charged by Enso Wealth. The sub-adviser will debit their management directly from your account(s). Enso Wealth does not receive any portion of this compensation and as such, is not incentivized to recommend such services.

Sleeve Strategy Manager fees are charged in addition to our firm's fee, and are only billed on the assets invested in the Strategy Sleeve. Our Sleeve Strategy Fee rate will typically range from 0.15% to 1.25% per annum of which a portion is paid to the Sleeve Strategy Manager and generally a portion is paid to the TAMP provider. The Sleeve Strategy Fee will depend upon the value of your account and the composition of the choice of third-party Strategy Managers utilized by your Wealth Advisor. We do not impose a minimum account size for our Sleeve Strategy Services.

However, certain fixed income and equity strategies may not be efficiently implemented with amounts under \$100,000.

Pension Consulting:

We charge on a flat fee basis for pension consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our flat fees generally range from \$3,500 to \$5,000.

The fee-paying arrangements for pension consulting service will be determined on a case-by-case basis and will be detailed in the signed Pension Consulting Agreement. The client will be invoiced directly for the fees.

Held Away Account Services:

We charge an annual fee for certain services provided for accounts that are not in our custody (“Held Away”), such as 401(k) accounts, 529 plans, variable annuities, and other assets we do not custody. This fee is not deducted from the Held Away account, but rather from an account currently under Enso Wealth management (custodied with Schwab) on a quarterly basis in advance or by other means such as invoicing. Fees are based on the assets within these Held Away accounts, and are charged in accordance with our standard fee schedule which is based on the valuation of the accounts at the close of the quarter as valued by the account custodian.

Insurance:

In the course of providing its investment management and financial planning services, from time to time Enso Wealth also will recommend insurance products and investments. Certain Enso Wealth representatives are appointed sales agents for Highland Capital Brokerage, Inc. and The Quantum Group. When an Enso Wealth representative recommends an insurance product to a client, the applicable insurance issuer will typically pay a sales load or commission to them, personally. A conflict of interest therefore arises as these insurance sales create an incentive to recommend products based on the compensation they stand to earn.

Enso Wealth does not make any representation that these products and services are offered at the lowest available cost and the client may be able to obtain the same products or services at a lower cost from other providers. However, the client is under no obligation to accept any of the recommendations of Enso Wealth or use the services of Enso Wealth in particular.

Other Fees:

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm that the trades are executed through. Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund’s prospectus (i.e., fund management fees and other fund expenses).

General Fee Disclosure

We believe our investment management fees are competitive with the fees charged by other investment advisors in the San Francisco Bay area for comparable services. However, comparable services may be available from other sources for lower fees than those charged by the Firm. The Firm receives no sales commissions on investment products purchased or sold for client accounts. We do not provide clients advice as to the tax deductibility of our advisory fees. Clients are directed to consult a tax professional to determine the potential tax deductibility of the payment of advisory fees.

Compensation Related to Private Funds the Funds

The assets any client invests into either Fund will generally be included for purposes of calculating Enso's annual asset management fee, subject to discount with respect to assets invested into Fortune Bridge and Mr. DeMar waiving his receipt of TRAM's management fee with respect to Enso clients. The firm's asset management fee calculated on the Funds (and other private funds) are based on the principal amount of the initial investment, not based on the current market value at the time of billing. This is due to the conflict of interest that exists due to our advisory clients purchasing shares of a private fund partially owned by a principal of the firm.

This conflict of interest arises because Wealth Advisors have an incentive to recommend the purchase of both Funds based on the compensation received rather than solely based on the client's needs. Clients are under no obligation, contractually or otherwise, to purchase either Fund through any person affiliated with our firm who receives compensation described above. Additionally, the advisory personnel of the firm (specifically, Mr. DeMar and Mr. Sweis) benefit from the sale of interests in the fund as an equity holder of the fund structure.

Wealth Advisors can receive compensation in the form of a performance-based fee for promoting the Fund or other work done to establish, manage, and operate the Fund. These conflicts are mitigated by the fiduciary reviews by applicable Wealth Advisors, appropriate disclosure, and through compliance reviews to determine that an investment in the Fund is appropriate for the client investing into the Fund.

Refunds Following Termination

We charge our advisory fees quarterly in advance. The Firm does not assess any fees related to termination but will be entitled to all management fees earned up to the date of termination. In the event that a client wishes to terminate our services, we will refund the unearned portion of our advisory fee. Clients must contact us in writing and state to terminate our services. Upon receipt of a letter of termination, we will proceed to close out the client's account and process a pro-rata refund of unearned advisory fees.

Commissionable Securities Sales

We do not sell securities for a commission in our advisory accounts.

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

We do not charge our clients performance-based fees based on the capital gains of client assets.

However, the Funds recommended to certain clients charge performance fees. Specifically with respect to TRAM, the carried interest to be received by the General Partner (of which Mr. DeMar is a 50% owner), is based on net cash flow and the net profits, if any, resulting from TRAM's Portfolio Investments. Specifically with respect to Fortune Bridge, a 20% promote is charged after 100% return of capital and a 6% preferred return. The carried interest and promote, therefore, create a conflict of interest in that there is an incentive to direct clients to invest into such Funds.

Item 7: Types of Clients & Account Requirements

Our clients include, have included, and may include some or all of the following client types: individuals, high net worth individuals, trusts, estates, endowments, charitable organizations, corporations, limited liability companies and other business entities, IRA's and pension and profit-sharing plans.

We typically do not require a minimum household balance for our Comprehensive Portfolio Management service. We generally charge a minimum fee of \$3,500 for written financial plans.

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

Methods of Analysis:

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting: In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis: We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Investment Strategies We Use:

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-Term Purchases: When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically, we employ this sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Short-Term Purchases: When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Trading: We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Short Sales: We borrow shares of a stock for a client's portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Margin Transactions: We will purchase stocks for a client's portfolio with money borrowed from the client's brokerage account. This allows a client to purchase more stock than he or she would be able to with their available cash and allows us to purchase stock without selling other holdings.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and the account(s) could appreciate in value, it is also possible that the stock market may decrease, and the account(s) could decline in value. It is important that investors understand the risks associated with investing in the stock market, and are appropriately diversified in their investments, and ask their adviser any questions they may have.

Description of Material, Significant or Unusual Risks

Here are some of the risks associated with parts of our investment strategy:

Returns on Cash Balances - We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to Asset Management and Comprehensive Portfolio Management, as applicable.

Market Risk: securities traded on securities exchanges are subject to demand and supply conditions. Investors could receive less than the original investment amount when they sell a security if the demand for that security has fallen. Prices generally reflect investors' confidence in the economy, interest rates, and many other factors. Investors must be able to tolerate such price movements.

Income Risk: Dividends may not be paid if a securities issuer reports an operating loss.

Short-term purchases – We may determine to buy or sell securities in a client's account and hold them for less than a year. Some of the risks associated with short-term trading that could affect investment performance are increased commissions and transaction costs to the account and increased tax obligations on the gains in a security's value.

Bond Pricing – The price of bonds depends in part on the current rate of interest. Rising interest rates decrease the current price of bonds because current purchasers require a competitive yield. As such, decreasing interest rates increase the current value of bonds with associated decrease in bond yield. We may decide to exchange to a lower or higher duration bond or to another asset class due to interest rate risk that could affect investment performance.

Inflation - Inflation is the loss of purchasing power through a general rise in prices. If an investment portfolio is designed for current income with a real rate of return of 4% and inflation

were to rise to 5% or higher, the account would result in a loss of purchasing power and create a negative real rate of return.

Price Fluctuation - Security prices do fluctuate (except for cash or cash equivalents) and clients must accept that risk associated with the fluctuations or change to a more appropriate investment portfolio in alignment with their risk tolerance.

Interest-rate Fluctuation - 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.

Currency Fluctuation - 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 of Dividends – We will reinvest interest, dividends and capital gains as appropriate to accumulate wealth based on factors such as ongoing cash needs and tax loss harvesting opportunities. This is an appropriate strategy for a portfolio designed for capital growth. However, the reinvested earnings could result in a lower or a higher rate of return than was initially projected.

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 for the securities issued by such companies.

Mutual Funds with Foreign Asset Holdings – Any investments in mutual funds that make foreign investments and are not hedged back to the U.S. Dollar are subject to the uncertainty with changes in the foreign currency value. The client may bear more risk and may earn a substantially higher return or a substantially lower return than projected.

Short Sale Trading. Short selling carries high risk. The payoff ratio is high in that the maximum gain, which would occur if the shorted stock went to zero, is limited, but the maximum loss is infinite since stocks can always rise in price. In addition to trading commissions, other costs include the costs of borrowing the security to short it and the interest payable on the margin account that holds the shorted security. A short seller is responsible for making dividend payments on the shorted stock to the entity from whom the stock was borrowed. Stocks with very high short interest may occasionally surge in price - usually when there is a positive development in the stock - which forces short sellers to buy the shares back to close their short positions. Heavily shorted stocks are susceptible to “buy-ins,” which occur when a broker closes out short positions in a difficult-to-borrow stock whose lenders are demanding it back. Regulators may impose bans on short sales in a specific sector or even in the broad market to avoid panic and unwarranted selling pressure. Such actions can cause a spike in stock prices, forcing the short seller to cover short positions at huge losses. Very good market timing is required - unlike the “buy-and-hold” investor who can afford to wait for an investment to work out, the short seller does not have the luxury of time because of the many costs and risks associated with short selling. Timing is everything when it comes to shorting.

Private Funds. Investments in private funds are often subject to liquidity restrictions, which means that a client may not be able to redeem his or her investment until a redemption window is available. In addition, such investments can be more volatile and less transparent than an exchange-listed security that trades daily in an electronic marketplace. Private funds are generally more difficult to value than exchange-listed securities, and therefore are more reliant on individual judgment as opposed to market prices when determining a valuation. Investors into private funds are typically required to be either accredited investors, qualified clients, or both, and should carefully consider the specific risks described in the applicable private placement memorandum, limited partnership agreement, and other fund-related disclosure documents.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

In the course of providing its investment management and financial planning services, Enso Wealth will from time to time also recommend insurance products and investments. Certain Enso Wealth representatives are appointed sales agents for Highland Capital Brokerage, Inc. and The Quantum Group. When an Enso Wealth representative recommends an insurance product to a client, the applicable insurance issuer will typically pay a sales load or commission to them, personally. A conflict of interest therefore arises as these insurance sales create an incentive to recommend products based on the compensation they stand to earn.

Highland Capital Brokerage, Inc. and The Quantum Group are wholly independent of and otherwise unaffiliated with Enso Wealth. They do not supervise its financial planning or investment management services and have no responsibility for the services to its clients.

As described above, Mr. DeMar is a 50% owner of TRABD, LLC, which is a general partnership entity that manages TRAM. Mr. DeMar is involved in the marketing, management, and operations of the Fund. Mr. DeMar and other Wealth Advisors of the Firm will offer investments into the Fund to certain advisory clients when appropriate. This arrangement presents a conflict of interest because Wealth Advisors have an incentive to recommend investments into the Fund to clients based on the compensation received rather than solely based on the client's needs. Mr. DeMar also receives a performance fee based on the performance of the Fund.

Any client that purchases shares of a private fund under the advisory agreement will pay an asset management fee calculated on the principal amount of shares purchased, not based on the current market value at the time of billing. Mr. DeMar could receive remuneration as an equity holder and incremental investments increase the value of TRAMF21, LP.

As described above, Mr. Sweis is the founder & CEO of Fortune Bridge, a multi-manager real estate fund that was created to align accredited investors with institutional and local real estate managers across the US. In addition to pooled investment vehicles, Fortune Bridge will target investments with current income and potential for growth through property improvements and repositioning. Mr. Sweis is involved in the marketing, management, and operations of the Fund. Mr. Sweis and other Wealth Advisors of the Firm will offer investments into the Fund to certain advisory clients when appropriate. This arrangement presents a conflict of interest because Wealth Advisors have an incentive to recommend investments into the Fund to clients based on the compensation received rather than solely based on the client's needs. Mr. Sweis also receives a performance fee based on the performance of the Fund.

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

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We

require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize any conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

Related persons may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. If a security is bought or sold for clients and for Firm access persons on the same day, the access person's trades must either be: 1. aggregated with the client transactions, in which case all participants in the transaction participate on an average price basis; or 2. executed at the end of the trade day after all client trades in the subject security for that day are completed. If the access person's purchase of the security is not aggregated with client trades, the price received by the access person cannot be more favorable than the price received for the same security for client accounts that day.

Related persons may buy or sell different investments, based on personal investment considerations, which the Firm may not deem appropriate to buy or sell for clients. It is also possible that employees may take investment positions for their own accounts that are contrary to those taken on behalf of clients. Employees may also buy or sell a specific security for their personal account based on personal investment considerations aside from company or industry fundamentals, which are not deemed appropriate to buy or sell for clients. If these securities subsequently appreciate, these personal transactions could be viewed as creating a conflict of interest.

Conversely, related persons may liquidate a security position that is held both for their own account and for the accounts of Firm clients, sometimes in advance of clients. This occurs when personal considerations (i.e., liquidity needs, tax-planning, industry/sector weightings) deem a sale necessary for individual financial planning reasons. If the security subsequently falls in price, these personal transactions could be viewed as a conflict of interest.

For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children, or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest.

Item 12: Brokerage Practices

Recommendation of Custodians and Executing Broker-Dealers

Enso Wealth recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. (“Schwab”) a registered broker-dealer and qualified custodian, to maintain custody of clients’ assets and to effect trades for their accounts. Schwab is independently owned and operated and not affiliated with Enso Wealth and does not supervise or otherwise monitor its investment management services to its clients.

Schwab provides the firm with access to its institutional trading and custody services, which typically are not available to individual retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a set minimum of the adviser’s clients’ assets is maintained in accounts at the broker-dealer, but are not otherwise contingent upon Enso Wealth committing to any specific amount of business (in the form of either assets in custody or trading). Schwab’s services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

From time to time, Schwab will also make available to Enso Wealth other products and services that benefit the firm but may not benefit its clients. Some of these other products and services assist us in managing and administering clients’ accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of the firm’s fees from its clients’ accounts; and assist with back-office functions, recordkeeping and client reporting. Schwab has also waived client account transfer fees that would otherwise be payable by clients transferring their assets to Schwab, and retains the discretion to do so on behalf of new Enso Wealth clients in the future. Many of these services generally may be used to service all or a substantial number of our client accounts, including accounts not maintained at Schwab, if any. Custodians also generally make available to the Firm other services intended to help us manage and further develop its business. These services include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, the custodians generally make available, arrange and/or pay for these types of services to the firm by independent third parties. Schwab retains the right to discount or waive fees they otherwise would charge for some of these services or pay all or a part of the fees of a third-party providing these services to Enso Wealth.

Enso Wealth’s recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to the firm of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest.

For Enso Wealth client accounts maintained in their custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through them or that settle into client accounts that are held with them. In most cases, trade executions for client accounts custodied at Schwab will be made by Schwab to avoid “trade away” charges otherwise imposed for trades executed at other broker-dealers. In cases where a desired security is not available for purchase or sale through the custodial broker, and in light of our best execution evaluation, certain executions may be made at a different broker-dealer. Schwab sends account statements directly to the client (or to an independent third-party representative designated by the client), no less than monthly, showing all funds and securities held, their current value and all transactions executed in the client’s account, including the payment to Enso Wealth of its investment management fees.

Best Execution

We are not obligated to obtain the best net price or lowest brokerage commission on any particular investment transaction. Rather, applicable law requires investment managers to use their reasonable best efforts to seek the most favorable execution for each transaction executed on behalf of client accounts.

In selecting broker-dealers to recommend, our primary objective is to seek the best execution. Expected price, giving effect to brokerage commissions, if any, and other transaction costs, are principal factors, but the selection also takes account of other factors, including the execution, clearance and settlement capabilities of the broker-dealer, the broker-dealer’s willingness to commit capital, the broker-dealer’s reliability and financial stability, the size of the particular transaction and its complexity in terms of execution and settlement, the market for the security, the value of any research and other brokerage services provided by the broker-dealer, and the cost incurred by placing prime brokerage trades in client accounts.

Based upon an evaluation of some or all of these factors, we may execute client trades through broker-dealers that charge fees that are higher than the lowest available fees. We may select broker-dealers, including Schwab, whose fees may be greater than those charged for similar investments if we determine that brokerage services and research materials provided by that broker-dealer warrants the payment of higher fees.

We review transaction results periodically to determine the quality of execution provided by the various broker-dealers through whom the firm executes transactions on behalf of clients.

Trade Errors

We shall handle trade errors in a manner that does not disadvantage the client, irrespective of the cause of the error. The following procedures apply to all trade errors resolved by the firm:

- An Enso Wealth employee may not resolve a trade error without the approval of a senior principal or other supervisor.

- Trade errors are processed through the Enso Wealth error account established at the Custodian with the following requirements:
 - Enso Wealth must immediately pay any debit balances created in the Error Account as a result of a trade error.
 - Enso Wealth may place no proprietary or client trades or transact any other business in the Error Account (including but not limited to check writing, check card and money link activities), with the exception of covering trades placed by Schwab in the Error Account.
 - The Custodian has placed a restriction on the Enso Wealth Error Account which blocks the movement of money and securities out of the Error Account.

Soft Dollars

We do not receive soft dollar benefits although the non-soft dollar investment research products and services that are obtained by our firm will generally be used to service all of our clients. The non-soft dollar research products and services may benefit some but not all of the clients or may benefit only the firm.

Directed Brokerage

In a limited number of cases, clients may direct the firm to place all orders for securities transactions with a specific broker-dealer (directed brokerage). In these cases, Enso Wealth is not obligated to, and will generally not solicit competitive bids for each transaction or seek the lowest commission rates for the client. As such, the client may pay higher commission costs, higher security prices and transaction costs than it otherwise would have had it not directed the firm to trade through a specific broker. In addition, the client may be unable to obtain the most favorable price on transactions executed by the firm as a result of our inability to aggregate/bunch the trades from this account with other client trades.

Furthermore, the client may not be able to participate in the allocation of a security of limited availability for various reasons, including if those new issue shares are provided by another broker or dealer. As a result of the special instruction, the firm may not execute client securities transactions with brokers that have been directed by clients until non-directed brokerage orders are completed. Accordingly, clients directing brokerage may not generate returns equal to clients that do not direct brokerage.

Due to these circumstances, there may be a disparity in commission rates charged to a client who directs the firm to use a particular broker and performance and other differences from other similarly managed accounts. Clients who direct brokerage should understand that similar brokerage services may be obtained from other broker-dealers at lower costs and possibly with more favorable execution.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of Purchase or Sale

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the affected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

We review accounts on at least a quarterly basis for our clients subscribing to our Comprehensive Portfolio Management service. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Enso Wealth portfolio advisors James C. DeCota, Noah B. Jacobson, William G. DeMar, Taylor M. Greenleaf, Joanna C. Aiken, Andrew E. Thompson, Joseph K. Stern, David R. Jones, Sean Harrell, Mark Clure, Casey Clure, Stephen Sear or Firm financial advisors under their supervision, conduct account reviews. We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we contact clients who subscribe to our Comprehensive Portfolio Management service.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Pension Consulting clients receive reviews of their pension plans for the duration of the pension consulting service. We also provide ongoing services to Pension Consulting clients where we

meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Pension Consulting clients do not receive written or verbal updated reports regarding their pension plans unless they choose to contract with us for ongoing Pension Consulting services.

Financial Planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately contract with us for a post- financial plan meeting or update to their initial written financial plan.

Third Party Money Managers

We review our third-party money managers on at least an annual basis to determine if they are effectively managing our client's accounts.

Item 14: Client Referrals & Other Compensation

We receive an economic benefit from client custodians in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

While we recommend that clients use Schwab as custodian/brokers, each client decides whether to do so and opens their account with Schwab by entering into an account agreement directly with them. We do not open the accounts for clients.

Referral Fees

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm.

From time to time, we will refer clients in need of independent trustee services to an independent and unaffiliated third-party trustee, Overture Strategic Partners LLC ("Overture"). In consideration of such referrals to Overture, Overture will remit to Mr. DeCota and Mr. DeMar a percentage of the profits Overture derives from the clients referred by us to Overture. This creates a conflict of interest due to the financial incentive it creates for Mr. DeCota and Mr. DeMar to refer such clients to Overture. We address this conflict of interest by fully disclosing it in this brochure, by advising referred clients of the compensation that will be received, and by advising clients that they are not obligated to utilize the independent trustee services of Overture or any other third-party we may recommend.

Item 15: Custody

Enso Wealth does not maintain physical custody of client funds or securities. Clients are required to set up their investment accounts with a “qualified custodian,” namely a broker dealer, bank or trust company.

The firm is given the authority to receive payment of its management fees directly from the account, but it is not authorized to make any other withdrawals or to transfer money out of the account to a third party other than as permitted under applicable custody rules. Regulators generally take the position that where an investment adviser is authorized or permitted to withdraw advisory fees from a client upon the adviser’s instruction to the custodian, the adviser is “deemed” to have custody (although not physical custody) of client assets. As such, we have adopted the following safeguarding procedures:

- Our clients must maintain their investment accounts with a qualified third-party custodian, independent of our firm;
- Our clients must provide their custodian with written authorization permitting direct payment to us of our advisory fees directly from their account(s);
- We must send a statement to our clients showing the amount of our fee, the value of the assets upon which our fee was based, and the specific manner in which our fee was calculated;
- We must disclose to our clients that it is their responsibility to verify the accuracy of our fee calculation, and that the custodian will not determine whether the fee is properly calculated; and
- The account custodian must agree to send our clients a statement, at least quarterly, showing all disbursements from their account, including advisory fees.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send each client independent account statements listing the account balance(s), transaction history and any fee debits or other fees taken out of the account.

Based on the No-Action Letter submitted by the Investment Adviser Association dated February 21, 2017, the SEC indicates that an adviser generally has custody where a client grants the adviser power in a standing letter of authorization (“SLOA”) to conduct third party transfers (i.e. Instruct the qualified custodian to accept the adviser’s direction on the client’s behalf to move money to a third party designated in the SLOA). These SLOAs have been put in place upon the client’s written request and signature. For instance, the amount or timing of the transfers may not be on the SLOA submitted to the custodian; however, at a future date, a client will contact the Adviser requesting that the adviser submit instructions to the custodian to remit a specific dollar amount from the account to the designated third-party (both of which are identified in the SLOA that is on file). As further outlined in the No-Action Letter, the Adviser is exempt from certain ongoing requirements of the Custody Rule as we comply with the stated conditions of the letter.

To the extent a client invests in either Fund, Enso Wealth will be deemed to have indirect custody of such assets that are invested into either Fund due to the control positions of Mr. DeMar and

Mr. Sweis with respect to TRAM and Fortune Bridge, respectively. As such, both Funds are audited by an independent public accountant each year, and both Funds' financial statements are distributed to investors in both Funds annually.

Item 16: Investment Discretion

Clients appoint Enso Wealth as their investment advisor and grant full trading and investment discretion over their assets at the time they establish their investment accounts. Subject to the Firm's investment strategy and the client's investment objectives, our portfolio managers are given full discretion to determine:

- Types of investments;
- Which securities to buy;
- Which securities to sell;
- The timing of any buys or sells;
- The amount of securities to buy or sell; and
- The broker-dealer to be used in the transaction

This discretion may be limited by client investment guidelines and by any investment restrictions set by the client. Where possible, the Firm will attempt to negotiate the commission rates at which transactions for client accounts are affected, with the objective of attaining the most favorable price and market execution for each transaction.

The Firm may accept client investment assets on a non-discretionary basis. In these instances, our portfolio manager will make recommendations to the client regarding types of investments to buy and sell, the timing and amount of such transactions and where applicable, the executing broker-dealer to affect the transactions. The decision to implement or reject the portfolio manager's recommendations remains with the client and transactions will be entered only after specific client authorization.

Item 17: Voting Client Securities

Enso does not vote proxies on behalf of its clients for securities held in client accounts.

Consequently, the client retains the responsibility for receiving and voting all proxies for securities held within the client's account. Enso Wealth shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client.

Item 18: Financial Information

Enso Wealth does not require or solicit prepayment of more than \$1,200 of its investment management fees from clients six or more months in advance. There are no adverse conditions related to the Firm's finances that are likely to impair its ability to meet its contractual

commitments to its clients. The Firm has not been the subject of a bankruptcy filing in the last ten years.

I. Privacy Policy

OUR COMMITMENT TO YOUR PRIVACY: protecting clients' privacy is of paramount importance to Enso Wealth Management, LLC (the "firm" or "advisor"). It is Enso Wealth's policy that no private client financial information obtained by the firm is sold or made available to third parties except that:

- Third parties may be used by the Firm to assist in the management or maintenance of client accounts (such as a custodian, broker or bank).
- Client information may be released to client's accountancy, legal and other third party representatives at client's direction;
- Client information may be released in accordance with applicable laws and regulations.

The Firm will not share nonpublic personal information about its clients with nonaffiliated third parties without prior client consent, except for specific purposes described below. This notice explains the Firm's collection, use and safeguarding of client information.

How Enso Wealth Gathers Information: In connection with providing clients with investment management services, the Firm may obtain information about its clients from the following sources:

- Client agreements and other information that clients provide to the Firm, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references;
- Personal tax returns provided by the client;
- Transactions on a client's behalf. This information may include the client's account balances, positions, investment interests and history;
- Consumer reporting agencies. This information may include account information and credit history; and
- Public sources.

Sharing Information with Nonaffiliated Third Parties: Advisor only discloses non-public client information to nonaffiliated third parties when it is believed necessary for the Firm's provision of services to you or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the Firm or on its behalf to develop or maintain proprietary trading or other software;

- In connection with a proposed or actual sale, merger, or transfer of all or a portion of the Firm’s business or an operating unit;
- To help prevent fraud;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the Firm;
- To comply with federal, state or local laws, rules and other applicable legal requirements; and
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Enso Wealth does not make any disclosure of client nonpublic personal information to other companies who may want to sell their products or services to you. For example, the Firm does not sell client lists and the Firm will not sell client names to catalog companies.

Use of Third Party Electronic Platforms: The Firm is aided in its ongoing client account monitoring and management services by the use of third party portfolio and trade data management software and services provided by Schwab Portfolio Center, Orion Advisor, Salesforce, Kwanti, and FeeX. Such third party services provide linked access to client custodial accounts and trade activity and provide “cloud” storage of such data on their secure, internal computer servers on behalf of the Firm. We only share non-public client information with non-affiliated third parties when we believe it necessary for our provision of services to you or to maintain your account.

Opt In – Opt Out Provision: If, at any time in the future, it is necessary to disclose any client personal information in a way that is inconsistent with this policy, Enso Wealth will give its clients advance notice of the proposed disclosure so that they will have the opportunity to either opt-in or opt-out of such disclosure, as required by applicable law.

Clients are advised that the Firm believes that sharing client private information under the circumstances noted above is either mandated by law or necessary for the Firm to conduct its business and to best service client accounts. Clients desiring to opt out of any third party disclosures should contact the Firm immediately. Opting out may necessitate that we terminate our management agreement with you and arrange for you to transfer your account.

Former Clients: This Privacy Policy continues to apply to all former clients.

To Whom This Policy Applies: This Privacy Policy applies to individuals who obtain or have obtained services from Enso Wealth used primarily for personal, family or household purposes.

Our Security Practices and Information Accuracy: Enso Wealth takes steps to safeguard client information. Access to the personal and account information of clients is restricted to its employees and agents for business purposes only. The Firm maintains physical, electronic and procedural safeguards to guard your personal information. Additionally, the Firm has internal controls to keep client information as accurate and complete as possible. If you believe that any information about you is not accurate, please contact the Firm.

Other Information: Enso Wealth reserves the right to change this Statement of Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to

be exclusive. If you have any questions about this Privacy Policy, please contact Joseph K. Stern, Chief Compliance Officer at (707) 981-7584.