Top Shelf Private Wealth
Firm Brochure - Form ADV Part 2A

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Item 1: Cover Page
This brochure provides information about the qualifications and business practices of Top Shelf Private Wealth. If you have any questions about the contents of this brochure, please contact us at 415-915-5948 or by email at: josh@topshelfprivatewealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Top Shelf Private Wealth is also available on the SEC's website at www.adviserinfo.sec.gov. Top Shelf Private Wealth's CRD number is: 322123.

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

Item 2: Material Changes

The material changes in this brochure since the last annual updating amendment of Top Shelf Private Wealth on March 30, 2026, are described below. Material changes relate to Top Shelf Private Wealth policies, practices or conflicts of interests.

- Item 4 & 5: The Firm has updated its services and fee schedule.

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Wealth In Yourself LLC d/b/a Top Shelf Private Wealth (hereinafter “TSPW”) is a Limited Liability Company organized in the State of Delaware. The firm was formed in April 2022 and the principal owner is Joshua Michael St Laurent.

B. Types of Advisory Services

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; real estate, college planning; debt/credit planning; estate planning through third-party arrangements; teaching models on financial psychology and "money scripts"; "give-while-living" philanthropic planning; social comparison guidance; and grief/illness support planning for major life events.

Investment planning involves working with clients to make sure their investments match their respective risk tolerance and goals. Tax concerns are addressed by working with the client to determine and compare effective tax rates for income, capital gains and other earnings or investments, then attempting to allocate the client’s resources accordingly. Life insurance planning entails reviewing the life insurance and/or disability insurance needs of the client, together with any applicable dependents, spouse or other relatives, and assessing appropriate coverage for these individuals. College planning entails helping clients save for higher education, whether for the client or his/her children or other dependents, in the ideal manner to suit the client’s overall financial goals and means. Financial planning to address retirement entails making sure clients are financially equipped for retirement in light of the client’s anticipated income and expenses, investments, and other assets. Debt/credit planning consists of breaking down client budgets and aiding clients in decision-making as to current debt, anticipated significant expenses and potential debt, and avoiding excessive debt. Financial planning incorporates educational modules to help clients identify and understand their personal "money scripts" and how they may drive financial behaviors. "Give-while-living" planning assists clients in designing and executing strategic, philanthropic or gifting strategies during their lifetime, which are integrated into their formal client deliverables.

TSPW offers ongoing financial planning services, as well as an option for a one-time financial planning meeting. If a client decides to engage in a one-time meeting, we will meet for 90 minutes to discuss your financial situation.

Ongoing financial planning services include but is not limited to ongoing financial monitoring, tax management, investment management, guidance on diversification outside of investment accounts, accountability, or coaching. These services also feature a quarterly check-in protocol designed to address financial anxieties related to social comparison, as well as a dedicated grief and illness support protocol to provide structured financial guidance and administrative relief during major, unexpected life events.

Altruist Model Marketplace

As part of TSPW's financial planning services, TSPW participates in the Model Marketplace of Altruist LLC, an SEC- registered investment adviser and affiliate of Altruist Financial LLC. TSPW may select for client accounts any of the available Altruist LLC- generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. All Altruist LLC advisory fees for assigned portfolios are charged directly to client accounts by Altruist LLC. Altruist will auto rebalance client accounts. TSPW will maintain discretion in order to place trades via Altruist in client accounts managed by Altruist automated platform. TSPW will help guide clients in selecting Altruist generated portfolios as part of the financial planning services provided by TSPW. This financial planning service will be re-evaluated with the client on an annual basis. TSPW will have meetings with clients at the client's discretion, at least annually, and will reach out to the client twice a year to conduct a check-in with the client. TSPW will accept discretionary authority over client accounts. TSPW will recommend premade portfolios to clients managed by Altruist, TSPW has the ability to customize portfolios if it is in the clients' best interest. TSPW will choose the appropriate premade portfolio provided and managed by Altruist. Altruist will primarily manage the client account. Altruist will deduct its wrap fee for the Platform from Platform Accounts and although Altruist's wrap fee is currently 0%, it may range from 0% to 1%.

TSPW will also offer à la carte financial plans to client on an hourly basis.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Services Limited to Specific Types of Investments

TSPW generally limits its investment advice to index mutual funds, real estate funds (including REITs), equities, ETFs and treasury inflation protected/inflation linked bonds. TSPW may recommend other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

TSPW offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent TSPW from properly servicing the client account, or if the restrictions would require TSPW to deviate from its standard suite of services, TSPW reserves the right to end the relationship.

D. Wrap Fee Programs

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

Altruist will deduct its wrap fee for the Platform from Platform Accounts and although Altruist's wrap fee is currently 0%, it may range from 0% to 1%. Please see Item 4.B for additional details.

E. Assets Under Management

TSPW has the following assets under management as of December 31, 2025:

Discretionary Amounts: $3,500,000
Non-discretionary Amounts: $0

Item 5: Fees and Compensation

A. Fee Schedule

Lower fees for comparable services may be available from other sources.

Financial Planning Fees

<u>Monthly Flat Fees</u>

Wealth In Yourself LLC operates two distinct advisory practices operating under different names: Wealth In Yourself ("WIY") and Top Shelf Private Wealth ("TSPW"). WIY and TSPW have different fees as described below.

WIY Fees

Net Worth	Annual Fee
$1,430,000	$15,000
$1,430,001- $3,000,000	0.35%
$3,000,001- $10,000,000	0.2%
$10,000,001 and Up	0.1%

TSPW charges for the time, energy and knowledge utilized to create your financial plan. Fees charged for our financial planning services are negotiable based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment advisor representative, and the total amount of assets under management for the client (combined as "negotiable factors"). The flat fee is calculated based on net worth (excluding Client's primary residence) and is charged as a monthly flat fee.

TSPW Fees

TSPW advisory fees are tiered based on athlete career stage and engagement complexity:

- Rookie Foundations: $15,000/year — entry-level professionals
- Pro Advisory: $35,000/year — established players in middle contract years
- Elite Family Office: Elite Family Office fees are negotiated individually based on service scope, filing jurisdiction count, and complexity. Typical annual range: $75,000 to $200,000.

Fees charged for our TSPW planning services are negotiable based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment advisor representative, and the total amount of assets under management for the client (combined as "negotiable factors"). The flat fee is charged as a monthly flat fee. For example, a client paying the Rookie Foundations fee will pay $1,250 each monthly totaling an annual fee of $15,000.

<u>Hourly Fees</u>

The negotiated hourly fee for these services is between $250 and $500.

Clients may terminate the agreement without penalty, for full refund of TSPW's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement without fee or penalty generally upon written notice.

<u>One-Time Meeting Fees</u>

The rate for these services is $499.

<u>Selection of Other Advisers Fees</u>

TSPW may select for client accounts any of the available Altruist LLC generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace, TSPW also has the ability to customize the portfolio to meet client needs. All Altruist LLC advisory fees for assigned portfolios are charged directly to client accounts by Altruist LLC. The notice of termination requirement and payment of fees for third- party investment advisers will depend on the specific third-party adviser selected. Altruist will deduct its wrap fee for the Platform from Platform Accounts and although Altruist's wrap fee is currently 0%, it may range from 0% to 1%. TSPW does not charge a management fee

B. Payment of Fees

<u>Payment of Financial Planning Fees</u>

Financial planning fees are paid via wire or TSPW may deduct the flat fee from the client account held at Altruist with client's written authorization.

Flat financial planning fees are paid monthly in arrears. Client will engage TSPW annually for financial planning. The initial monthly fee is paid in advance at the time of signing the client agreement.

Hourly financial planning fees are paid in advance before the financial planning meeting. The hourly engagement will be completed upon delivery of the financial plan.

One-time financial planning meeting fees are paid in advance before the financial planning meeting.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TSPW. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

TSPW collects fees in advance and fees in arrears. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation For the Sale of Securities to Clients

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

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

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

Item 7: Types of Clients

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

- Individuals
- High-Net-Worth Individuals

To best leverage our services, we recommend that clients utilizing our ongoing financial planning services have a minimum net worth of $1,000,000. This net-worth minimum is negotiable at our discretion. TSPW also requires a minimum annual advisory fee of $15,000.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

TSPW's methods of analysis include Modern portfolio theory.

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

Investment Strategies

TSPW recommends long-term trading.

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

B. Material Risks Involved

Methods of Analysis

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

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

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

C. Risks of Specific Securities Utilized

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

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

Index Mutual Funds: Index funds have generally followed a passive, rather than active, style of investing. This means they aim to maximize returns over the long run by not buying and selling securities very often. In contrast, an actively managed fund often seeks to outperform a market (usually measured by some kind of index) by doing more frequent purchases and sales. Like any investment, index funds involve risk. An index fund will be subject to the same general risks as the securities in the index it tracks. The fund may also be subject to certain other risks, such as: Lack of Flexibility. An index fund may have less flexibility than a non-index fund to react to price declines in the securities in the index. Tracking Error. An index fund may not perfectly track its index. For example, a fund may only invest in a sampling of the securities in the market index, in which case the fund's performance may be less likely to match the index. Underperformance. An index fund may underperform its index because of fees and expenses, trading costs, and tracking error.

Equity investment: generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (NAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another, and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Leveraged and Inverse ETFs: In general, a Leveraged ETF is designed to provide a multiple (e.g., two times) of the performance of the index, benchmark or single-security it tracks. An Inverse ETF is designed to provide the opposite of the performance of the index, benchmark or single-security it tracks. A Leveraged Inverse ETF is designed to provide a multiple of the opposite of the performance of the index, benchmark or single-security it tracks. Please keep in mind that Leveraged Inverse ETFs typically seek to achieve their investment objectives on a daily basis (i.e., over one trading session). When held for longer than one day, the performance of Leveraged Inverse ETFs can differ significantly from the performance (or the inverse of the performance) of their underlying index, benchmark or single-security over the same time period. This effect can compound the longer the product is held and result in large and unexpected losses, particularly in volatile markets.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Treasury Inflation Protected/Inflation Linked Bonds are treasury bonds indexed to an inflationary gauge, with the aim of protecting the bond holder from declines in the purchasing power of the holder's money. The principal value of these bonds will typically increase with inflation and decrease with deflation, whereas the interest payment varies with the adjusted principal value of the bond. The risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

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

Item 9: Disciplinary Information

We have no legal or disciplinary history to disclose under this item. Since we are registered in Massachusetts clients can obtain the disciplinary history, if any, of TSPW and its representatives from the Massachusetts Securities Division (617-727-3548) upon request. Please also see below for a discussion of applicable disciplinary history.

A. Criminal or Civil Actions

There are no criminal or civil actions to report. TSPW nor any management person has been involved in criminal or civil action in a domestic, foreign or military court of competent jurisdiction

B. Administrative Proceedings

There are no administrative proceedings to report. TSPW nor any management person has been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report. TSPW nor any management person has been involved in a self-regulatory organization (SRO) proceeding.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

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

Joshua Michael St Laurent has voluntarily subscribed to the "Real Fiduciary™ Practices" published by the Institute for the Fiduciary Standard. Real Fiduciary™ Practices offer a simple code of conduct and outline a commitment to clients of subscribing financial advisors. They seek to clearly articulate what a client can expect to receive from a subscribing financial advisor. These Real Fiduciary™ Practices do not replace our regulatory compliance obligations or duties to clients under relevant laws, rules, or regulations. The Institute for the Fiduciary Standard's role is limited to publishing the practices as well as maintaining a corresponding register of subscribing financial advisors. An annual registration fee is required to participate in the Real Fiduciary™ Practices Affirmation Program. You can verify our affirmation of Real Fiduciary™ Practices on our website or at the Institute for the Fiduciary Standard website at www.thefiduciaryinstitute.org. The practices can be found at https://thefiduciaryinstitute.org/wpcontent/uploads/2019/03/Real-Fiduciary-Practices-2019-02-22.pdf

Top Shelf Private Wealth and its management persons do not have any other material relationships or arrangements with other financial industry firms considered related parties that would present a possible conflict of interest.

CCR § 260.238 (k) provides that failing to disclose to a client in writing before entering or renewing an advisory agreement with that client any material conflicts of interest regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice does not promote "fair, equitable or ethical principles"

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

TSPW may direct clients to third-party investment advisers. TSPW is not compensated from the advisers to which it directs those clients. TSPW will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where TSPW is recommending the adviser to clients.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

TSPW does not recommend that clients buy or sell any security in which a related person to TSPW or TSPW has a material financial interest.

C. Trading in the Same Securities as Clients

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

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

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

Item 12: Brokerage Practices

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

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, TSPW recommends Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member as the clients' custodian.

TSPW will typically recommend premade portfolios to clients managed by Altruist, TSPW also has the ability to customize a portfolio if it is in the best interest of the client. TSPW will choose the appropriate premade portfolio. Altruist will auto rebalance client accounts. TSPW will maintain discretion in order to place trades via Altruist in client accounts managed by Altruist automated platform. Altruist places orders to buy or sell securities with Altruist Financial LLC consistent with the authority granted to it by TSPW, which includes, among other things, the authority to select which securities to buy and sell and when to place orders for the execution of securities.

1. Research and Other Soft-Dollar Benefits

TSPW does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC.

2. Brokerage for Client Referrals

TSPW does not receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

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

TSPW will require clients to use a specific broker-dealer to execute transactions. Not all investment advisers require their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

Generally, Altruist Financial LLC places orders to buy or sell securities consistent with the authority granted to it by TSPW, which includes, among other things, the authority to select which securities to buy and sell and when to place orders for the execution of securities.

If TSPW has made a custom portfolio at Altruist and TSPW buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, TSPW would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. TSPW would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with TSPW's duty to seek best execution, except for those accounts with specific brokerage direction (if any). When TSPW does not or cannot aggregate trades, clients may receive less favorable prices, pay higher brokerage commissions, or experience less efficient trade execution.

Item 13: Review of Accounts

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

All portfolio management accounts that are placed with Altruist are reviewed at least quarterly only by Joshua Michael St. Laurent, Founder with regard to clients' respective investment policies and risk tolerance levels.

All ongoing financial plans for ongoing clients will be reviewed quarterly by Joshua Michael St Laurent, Founder.

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

With respect to financial plans, TSPW's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each financial planning client will receive the financial plan upon completion.

Each portfolio management client placed with Altruist will receive at least monthly a written report that details the client's account including assets held and asset value, which report will come from the custodian.

Item 14: Client Referrals and Other Compensation

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

While TSPW does direct clients to third party advisors, TSPW does not receive any economic benefit, directly or indirectly from any third party for advice rendered to TSPW's clients.

B. Compensation to Non–Advisory Personnel for Client Referrals

TSPW does not compensate another person or entity for referring or soliciting clients for the Firm.

Item 15: Custody

For fees deducted directly from client accounts, in states that require it, TSPW will:

a) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
b) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
c) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from TSPW.

Item 16: Investment Discretion

TSPW will accept discretionary authority over client accounts. Clients will execute a limited power of attorney to evidence discretionary authority. TSPW will recommend premade portfolios to clients managed by Altruist, TSPW may customize the portfolios when in the best interest of the client. TSPW will choose the appropriate premade portfolio. Altruist will auto rebalance client accounts. Altruist places orders to buy or sell securities consistent with the authority granted to it by TSPW, which includes, among other things, the authority to select which securities to buy and sell and when to place orders for the execution of securities. TSPW will maintain discretion in order to place trades via Altruist in client accounts managed by Altruist automated platform. In some instances, TSPW's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to TSPW.

Item 17: Voting Client Securities (Proxy Voting)

TSPW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact TSPW with questions about a particular solicitation.

Item 18: Financial Information

A. Balance Sheet

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

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

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

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

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

TSPW currently has only one management person: Joshua Michael St Laurent, Personal CRD Number: 6437775. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Business Activities

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

C. Performance-Based Fees

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

Neither TSPW nor any of its management persons have never been involved in the following:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
    a. an investment or an investment-related business or activity;
    b. fraud, false statement(s), or omissions;
    c. theft, embezzlement, or other wrongful taking of property;
    d. bribery, forgery, counterfeiting, or extortion; or
    e. dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    a. an investment or an investment-related business or activity;
    b. fraud, false statement(s), or omissions;
    c. theft, embezzlement, or other wrongful taking of property;
    d. bribery, forgery, counterfeiting, or extortion; or
    e. dishonest, unfair, or unethical practices.

E. Material Relationships with Issuers of Securities

Neither TSPW, nor its management persons, has any relationship or arrangement with issuers of securities.