

# Form ADV Part 3 – Client Relationship Summary

Date: 04/08/2021

## Item 1: Introduction

ALETHEIAN WEALTH ADVISORS LLC is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

## Item 2: Relationships and Services

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

What investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments); financial planning (we assess your financial situation and provide advice to meet your goals). As part of our standard services, we typically monitor client accounts on a daily basis. Our firm offers both discretionary advisory services (where our firm makes the decision regarding the purchase or sale of investments) as well as non-discretionary services (where the retail investor makes the ultimate decision). We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our firm does *not* have a minimum account size. Please also see our Form ADV Part 2A ("[Brochure](#)"), specifically Items 4 & 7.

## Item 3: Fees, Costs, Conflicts, and Standard of Conduct

*Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? How might your conflicts of interest affect me, and how will you address them?*

What fees will I pay? Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. Portfolio management and financial planning fees are typically charged quarterly in advance. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#).

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you will pay transaction

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fees, if applicable, when we buy or sell an investment for your account. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Please also see our [Brochure](#) for additional details.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means (see heading immediately below).*

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 10 of our [Brochure](#) for additional details.

## Item 4: Disciplinary History

*Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?*

Do you or your financial professionals have legal or disciplinary history? No, we do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

## Item 5: Additional Information

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

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/304623> and any individual brochure supplement your representative provides. If you have any questions, need additional information, or want another copy of this Client Relationship Summary, then please contact us at 425-458-2840.

### Exhibit A – Material Changes to Client Relationship Summary

This is the initial version of the Client Relationship Summary. There are no material changes.

# Aletheian Wealth Advisors LLC Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Aletheian Wealth Advisors LLC. If you have any questions about the contents of this brochure, please contact us at 425 458-2840 or by email at: [rsiegel@aletheianadvisors.com](mailto:rsiegel@aletheianadvisors.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 Aletheian Wealth Advisors LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Aletheian Wealth Advisors LLC's CRD number is: 304623.*

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

Version Date: 01/07/2025

## **Item 2: Material Changes**

There are no material changes in this brochure from the last annual updating amendment on 02/13/2024 of Aletheian Wealth Advisors LLC. Material changes relate to Aletheian Wealth Advisors LLC's policies, practices or conflicts of interests.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Aletheian Wealth Advisors LLC (hereinafter AWA) is a Limited Liability Company organized in the State of Washington. The firm was formed in May 2019 and approved July 2019, and the principal owners are Joshua Ray Betts and Randy T Siegel.

### B. Types of Advisory Services

#### *Investment Management – Multi-Family Office Services*

Client families' best interests will be fully aligned with Aletheian Wealth Advisors as we serve them under a single entity that provides wealth management and advisory services.

Working with Aletheian Wealth Advisors will enable clients to establish a governance and management structure that addresses the complex issues surrounding a family's wealth, resulting in more effective decision making and the potential for better outcomes.

#### Key Elements of Multi Family Office Services

Centralize asset management activities with the potential to achieve higher returns or lower risk for investment decisions via a formalized investment process

- o Conduct an evaluation of the overall financial situation
- o Determine investment objectives and family philosophy
- o Establish risk profiles and time horizons
- o Determine asset allocation strategies for public markets and private holdings that balance risk/return goals with tax efficiency and wealth preservation
- o Manage liquidity
- o Coordinate other professional services such as philanthropy, tax and estate planning.
- o Facilitate the inter-generational transfer of wealth

AWA offers ongoing portfolio management services based on the Investment Policy Statement that is created for each client's specific situation.

AWA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. AWA will not accept clients who hold accounts managed solely on a non-discretionary basis. AWA will accept clients who hold a portion of their assets in unmanaged, non-discretionary companion accounts.

AWA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of AWA's economic, investment or other financial interests. To meet its fiduciary obligations, AWA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, AWA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is AWA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

### ***Family Advisory Services***

Financial Planning is an ongoing process that examines issues related to Family Succession; Estate and Wealth Transfer; Cash Flow and Sustainability Analysis; Philanthropic Intent; Minimization of Income and Estate Taxation; Life Management and Budgeting; Insurance Sufficiency and Efficiency Reviews.

AWA offers Family Advisory Services to clients with illiquid and complex balance sheets not under AWA management who require ongoing financial planning to address issues related to Family Succession; Estate and Wealth Transfer; Cash Flow and Sustainability Analysis; Philanthropic Intent; Minimization of Income and Estate Taxation; Life Management and Budgeting; Insurance Sufficiency and Efficiency Reviews, as well as ongoing coordination with attorneys and CPA's.

Each client situation is distinct, with complicated balance sheets that may include real estate, operating entities, liabilities and other unique assets. Complexity, asset structure, and the scope of future goals and current deficiencies determines the time commitment.

Clients may terminate the agreement within five business days of signing the Investment Advisory Contract without penalty. The ADV 2A and client contract has been updated.

### ***Services Limited to Specific Types of Investments***

AWA generally limits its investment advice to ETFs (including ETFs in the gold and precious metal sectors), equities, fixed income securities, real estate funds (including REITs), hedge funds, private equity funds, treasury inflation protected/inflation linked bonds, venture capital funds and private placements, and mutual funds, although AWA

primarily recommends ETFs. AWA may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

AWA will tailor a program for each individual client specific to their individual needs and requirements. AWA may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. 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 AWA from properly servicing the client account, or if the restrictions would require AWA to deviate from its standard suite of services, AWA 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, transaction costs, and certain other administrative fees. AWA does not participate in wrap fee programs.

### **E. Assets Under Management**

AWA has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$ 289,311,741	\$ 48,978,564	December 2024

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### *Investment Management – Multi-Family Office Services Fees*

Our annual advisory fee is calculated as a percentage of the market value of assets under our management. The annualized fee is set forth in the client investment advisory agreement and may take several factors into consideration; to include aggregate assets under management, the scope and complexity of the services to be provided, and the historical nature of the client relationship.

The fees are generally not negotiable. Clients may terminate within five (5) business days of signing the investment advisory contract. Thereafter, clients may terminate the contract immediately upon written notice.



Fees are collected quarterly in advance, based upon the value of the account(s) on the last day of the prior month.

<b>Total Assets Under Management</b>	<b>Annual Fees</b>
\$1 - \$3,000,000	1.00%
Next \$2,000,000	0.90%
Next \$5,000,000	0.65%
Next \$15,000,000	0.50%
Next \$25,000,000	0.40%
Next \$50,000,000	0.30%
Additional Funds over \$100,000,001	0.25%

Treasury Management is offered to maintain a high liquidity profile for a flat rate of 0.25%, with a minimum account value of \$1,000,000.

***Family Advisory Services Fees***

For clients with limited assets under management, particularly complex projects, or who require multi-faceted financial planning without investment management, we may negotiate a separate flat fee that reflects the scope and difficulty of the project and the training and skills of the professional(s) providing services. The specific terms and conditions will be set forth in a separate engagement contract and will reflect the projected complexity and scope of the analysis or services requested.

Fees are collected in advance. Depending upon the anticipated duration of services, fees may be prorated into quarterly installments or collected in whole.

**B. Payment of Fees**

***Payment of Investment Management – Multi-Family Office Services Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. For clients that elect billing, AWA is provided written authorization to withdraw fees directly from the Client's Custodial and/or Banking Accounts. Fees are paid in advance.

### ***Payment of Family Advisory Services Fees***

Fees are invoiced and billed directly to the client on a quarterly basis. Fees are paid in advance. AWA is provided written authorization by the client to withdraw fees directly from the Client's Custodial and/or Banking Accounts.

In all instances, AWA will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based.

AWA will include the name of the custodian on fee invoices. AWA will send these to the client concurrent with the request for payment or payment of AWA's advisory fee.

AWA urges the client to compare this information with the fees listed in the account statement.

### **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 AWA. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

AWA collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

AWA offers Family Advisory Services to clients with illiquid and complex balance sheets not under AWA management who require ongoing financial planning to address issues related to Family Succession; Estate and Wealth Transfer; Cash Flow and Sustainability Analysis; Philanthropic Intent; Minimization of Income and Estate Taxation; Life Management and Budgeting; Insurance Sufficiency and Efficiency Reviews, as well as ongoing coordination with attorneys and CPA's.

Each client situation is distinct, with complicated balance sheets that may include real estate, operating entities, liabilities and other unique assets. Complexity, asset structure, and the scope of future goals and current deficiencies determines the time commitment. The baseline for establishing annual fees for this type of multi-faceted financial planning without capital markets portfolio management is: Billed as an average of \$265.00 per hour with a minimum engagement of 20 hours.

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

AWA 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**

AWA generally provides advisory services to High-Net-Worth Individuals.

There is no account minimum for any of AWA's services.

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

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

AWA's methods of analysis include Fundamental analysis, Modern portfolio theory and Quantitative analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**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.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

## *Investment Strategies*

AWA uses long term trading, short term trading, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

**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*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**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.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

### *Investment Strategies*

AWA's use of margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those 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.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's

threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Selection of Other Advisers:** Although AWA will seek to select only money managers who will invest clients' assets with the highest level of integrity, AWA's selection process cannot ensure that money managers will perform as desired and AWA will have no control over the day-to-day operations of any of its selected money managers. AWA would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

### C. Risks of Specific Securities Utilized

AWA's use of margin transactions and options trading generally holds greater risk of capital loss. 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.

**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.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds

may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked 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. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**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. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**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.

**Hedge funds** often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Private equity** funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**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**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

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

Neither AWA 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 AWA 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**

Randy T Siegel is litigation consultant at RT Siegel Consulting.

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

AWA may direct clients to the third-party investment advisers. There is no revenue shared between AWA and third-party investment managers. AWA will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. AWA will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where AWA is recommending the adviser to clients.

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

## **A. Code of Ethics**

AWA 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. AWA's Code of Ethics is available free upon request to any client or prospective client.



## **B. Recommendations Involving Material Financial Interests**

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

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of AWA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AWA 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. AWA will always 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 AWA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AWA 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; however, AWA will never engage in trading that operates to the client's disadvantage if representatives of AWA buy or sell securities at or around the same time as clients.

# **Item 12: Brokerage Practices**

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

Custodians/broker-dealers will be recommended based on AWA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and AWA may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in AWA's research efforts. AWA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

AWA will require clients to use Fidelity Brokerage Services LLC.

## ***1. Research and Other Soft-Dollar Benefits***

While AWA has no formal soft dollars program in which soft dollars are used to pay for third party services, AWA may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). AWA may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and AWA does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. AWA benefits by not having to produce or pay for the research, products or services, and AWA will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that AWA’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

## ***2. Brokerage for Client Referrals***

AWA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

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

AWA will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If AWA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, AWA 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. AWA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Review of Accounts**

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

All client accounts for AWA's advisory services are reviewed monthly by AWA Chief Investment Officer Steve Kleyn to confirm adherence to client investment policies and risk tolerance levels. Additionally, all client accounts for AWA's advisory services are reviewed at least Annually by Randy T Siegel, Chief Operating Officer & Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AWA are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Randy T Siegel, Chief Operating Officer & Chief Compliance Officer.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of AWA's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. AWA will also provide at least quarterly a separate written statement to the client.

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

## **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)**

Other than soft dollar benefits as described in Item 12 above, AWA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to AWA clients.

## **B. Compensation to Non - Advisory Personnel for Client Referrals**

AWA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, AWA will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

AWA may also be deemed to have custody over the funds and securities of trust accounts for which it or its related person, Aletheian Fiduciary Services serves as trustee.

### **Item 16: Investment Discretion**

AWA provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, AWA generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, AWA'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 AWA).

### **Item 17: Voting Client Securities (Proxy Voting)**

AWA delegates proxy voting to Egan Jones Ratings Co. as its proxy voting agent. Egan Jones will assume voting and reporting responsibilities for client accounts. Client consent is obtained via the AWA retainer agreement.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

AWA neither requires nor solicits prepayment of more than \$1,200 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 AWA nor its management has any financial condition that is likely to reasonably impair AWA's ability to meet contractual commitments to clients.

**C. Bankruptcy Petitions in Previous Ten Years**

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

*This brochure supplement provides information about Joshua Ray Betts that supplements the Aletheian Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Joshua Ray Betts if you did not receive Aletheian Wealth Advisors LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Joshua Ray Betts is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Aletheian Wealth Advisors LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Joshua Ray Betts**

Personal CRD Number: 5174698

Investment Adviser Representative

Aletheian Wealth Advisors LLC  
777 108th Avenue NE, Suite 2250  
Bellevue, WA 98004  
(425) 458-2840  
[jbetts@aletheianadvisors.com](mailto:jbetts@aletheianadvisors.com)

UPDATED: 04/03/2023

## Item 2: Educational Background and Business Experience

**Name:** Joshua Ray Betts      **Born:** 1976

### **Educational Background and Professional Designations:**

#### **Education:**

Bachelors of Science Psychology, Oregon State University - 1999

#### **Designations:**

##### **CFP® - Certified Financial Planner**

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

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

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

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

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

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

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

## **CFA – Chartered Financial Analyst**

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

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

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

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

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.



### **Comprehensive and Current Knowledge**

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

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

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **Business Background:**

05/2019 - Present	Investment Adviser Representative Aletheian Wealth Advisors LLC
01/2019 - 06/2019	Sabbatical N/A
03/2016 - 01/2019	Managing Director, Client Management Cornerstone Advisors
11/2015 - 03/2016	VP, Senior Financial Consultant Charles Schwab
08/2014 - 10/2015	Managing Director Windhaven Investment Management
03/2014 - 08/2014	Sabbatical N/A
09/2008 - 03/2014	VP, Senior Portfolio Manager Invesco PowerShares

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Joshua Ray Betts is not engaged in any investment-related business or occupation (other than this advisory firm).

#### **Item 5: Additional Compensation**

Joshua Ray Betts does not receive any economic benefit from any person, company, or organization, other than Aletheian Wealth Advisors LLC in exchange for providing clients advisory services through Aletheian Wealth Advisors LLC.

#### **Item 6: Supervision**

As a representative of Aletheian Wealth Advisors LLC, Joshua Ray Betts is supervised by Randy T Siegel, the firm's Chief Compliance Officer. Randy T Siegel is responsible for ensuring that Joshua Ray Betts adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Randy T Siegel is (206) 999-8600.

*This brochure supplement provides information about Randy T Siegel that supplements the Aletheian Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Randy T Siegel if you did not receive Aletheian Wealth Advisors LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Randy T Siegel is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Aletheian Wealth Advisors LLC**

**Form ADV Part 2B – Individual Disclosure Brochure**

*for*

### **Randy T Siegel**

Personal CRD Number: 4320650

Investment Adviser Representative

Aletheian Wealth Advisors LLC  
777 108th Ave. NE, Suite 2250  
Bellevue, WA 98004  
(425) 458-2840  
[rsiegel@aletheianadvisors.com](mailto:rsiegel@aletheianadvisors.com)

UPDATED: 08/02/2023

## Item 2: Educational Background and Business Experience

**Name:** Randy T Siegel                      **Born:** 1958

### **Educational Background and Professional Designations:**

#### **Education:**

BA CINEMA, USC - 1981

#### **Designations:**

##### **CFP® - Certified Financial Planner**

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

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

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

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

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

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

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

***CTFA – Certified Trust & Financial Advisor***

- For advisors with estate planning and trust expertise, the advisor must have a minimum of three years’ experience in personal trusts and the completion of a designated Institute of Certified Bankers (ICB) trust training program *or* five years’ experience in wealth management and a bachelor’s degree *or* ten years’ experience in wealth management.
- Designees must also sign a professional code of ethics and pass an examination. Forty five credits of continuing education must be completed every 3 years.
- 

***CIMA®- Certified Investment Management Analyst***

MINIMUM QUALIFICATIONS

- In order to be considered for this designation, a professional must have at least three years experience in financial services. A satisfactory record of ethical conduct, as determined by Investments & Wealth Institutes Admissions Committee.
- Must complete an educational component covering Fundamentals, Investments, Portfolio Theory and Behavioral Finance, Risk and Return, Portfolio Construction and Consulting Process. Must complete a qualification examination and certification examination. 40 hours of continuing education must be completed every two years.

**Business Background:**

05/2019 - Present	Chief Operating Officer & Chief Compliance Officer Aletheian Wealth Advisors LLC
04/2016 - 05/2019	Managing Director of Wealth Planning & Trust Services Cornerstone Advisors, Inc
11/2015 - 04/2016	Director of Financial Planning Morton Capital Management
04/2012 - 11/2015	VP, Sr Financial Planner Key Private Bank

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Randy T Siegel is a litigation consultant at RT Siegel Consulting.

### **Item 5: Additional Compensation**

Randy T Siegel does not receive any economic benefit from any person, company, or organization, other than Aletheian Wealth Advisors LLC in exchange for providing clients advisory services through Aletheian Wealth Advisors LLC.

### **Item 6: Supervision**

As the Chief Compliance Officer of Aletheian Wealth Advisors LLC, Randy T Siegel supervises all activities of the firm. Randy T Siegel's contact information is on the cover page of this disclosure document. Randy T Siegel adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. Randy reports to Joshua Betts, CEO.

*This brochure supplement provides information about Steven Kleyn that supplements the Aletheian Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Steven Kleyn if you did not receive Aletheian Wealth Advisors LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Steven Kleyn is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Aletheian Wealth Advisors LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Steven Kleyn**

Personal CRD Number: 7463499

Investment Adviser Representative

Aletheian Wealth Advisors LLC  
777 108th Avenue NE, Suite 2250  
Bellevue, WA 98004  
(425) 458-2840  
[skleyn@aletheianadvisors.com](mailto:skleyn@aletheianadvisors.com)

UPDATED: 04/03/2023

## Item 2: Educational Background and Business Experience

**Name:** Steven Kleyn                      **Born:** 1982

### **Educational Background and Professional Designations:**

#### **Education:**

Master of Business Administration Business, Seattle University - 2009  
Bachelor of Arts Political Science, Pepperdine University - 2004

#### **Designations:**

##### **CFA - Chartered Financial Analyst**

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

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##### **High Ethical Standards**

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

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

##### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.



Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

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

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

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

### **Business Background:**

10/2021 - Present	Investment Adviser Representative Aletheian Wealth Advisors LLC
10/2021 - Present	Chief Investment Officer Aletheian Wealth Advisors LLC
10/2020 - 10/2021	Director, Investment Research Pathstone
11/2017 - 09/2020	Managing Director, Investments Cornerstone Advisors, Inc.
11/2015 - 11/2017	Senior Portfolio Manager Parametric
11/2011 - 10/2015	Portfolio Manager Parametric
05/2010 - 10/2011	Assistant Portfolio Manager Parametric

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Steven Kleyn is not engaged in any investment-related business or occupation (other than this advisory firm).

### **Item 5: Additional Compensation**

Steven Kleyn does not receive any economic benefit from any person, company, or organization, other than Aletheian Wealth Advisors LLC in exchange for providing clients advisory services through Aletheian Wealth Advisors LLC.

### **Item 6: Supervision**

As a representative of Aletheian Wealth Advisors LLC, Steven Kleyn is supervised by Randy Siegel, the firm's Chief Compliance Officer. Randy Siegel is responsible for ensuring that Steven Kleyn adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Randy Siegel is (425) 458-2745.

*This brochure supplement provides information about Kevin Andrew Erwert that supplements the Aletheian Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Kevin Andrew Erwert if you did not receive Aletheian Wealth Advisors LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Kevin Andrew Erwert is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Aletheian Wealth Advisors LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Kevin Andrew Erwert**

Personal CRD Number: 6005801

Investment Adviser Representative

Aletheian Wealth Advisors LLC  
777 108th Avenue NE, Suite 2250  
Bellevue, WA 98004  
(425) 458-2840  
[kerwert@aletheianadvisors.com](mailto:kerwert@aletheianadvisors.com)

UPDATED: 04/03/2023

## Item 2: Educational Background and Business Experience

**Name:** Kevin Andrew Erwert      **Born:** 1983

### **Educational Background and Professional Designations:**

#### **Education:**

Business Administration Finance, Seattle Pacific University - 2006

#### **Designations:**

##### **CFP® - Certified Financial Planner**

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

### **Business Background:**

06/2019 - Present	Investment Adviser Representative Aletheian Wealth Advisors LLC
08/2018 - 05/2019	Financial Advisor Vestory
08/2007 - 08/2018	Associate Client Manager Cornerstone Advisors

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of this advisory business.

### **Item 4: Other Business Activities**

Kevin Andrew Erwert is not engaged in any investment-related business or occupation (other than this advisory firm).

### **Item 5: Additional Compensation**

Kevin Andrew Erwert does not receive any economic benefit from any person, company, or organization, other than Aletheian Wealth Advisors LLC in exchange for providing clients advisory services through Aletheian Wealth Advisors LLC.

## **Item 6: Supervision**

As a representative of Aletheian Wealth Advisors LLC, Kevin Andrew Erwert is supervised by Randy T Siegel, the firm's Chief Compliance Officer. Randy T Siegel is responsible for ensuring that Kevin Andrew Erwert adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Randy T Siegel is (425) 458-2840.

*This brochure supplement provides information about Sylvia Jane Gilmore that supplements the Aletheian Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Sylvia Jane Gilmore if you did not receive Aletheian Wealth Advisors LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Sylvia Jane Gilmore is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Aletheian Wealth Advisors LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Sylvia Jane Gilmore**

Personal CRD Number: 7210137

Investment Adviser Representative

Aletheian Wealth Advisors LLC  
777 108th Avenue NE, Suite 2250  
Bellevue, WA 98004  
(425) 458-2840  
[sgilmore@aletheianadvisors.com](mailto:sgilmore@aletheianadvisors.com)

UPDATED: 04/03/2023

## Item 2: Educational Background and Business Experience

**Name:** Sylvia Jane Gilmore      **Born:** 1957

### **Educational Background and Professional Designations:**

#### **Education:**

BA Leisure Studies (Parks & Rec), Western Washington University - 1981

#### **Business Background:**

03/2020 - Present	Investment Adviser Representative Aletheian Wealth Advisors LLC
06/2019 - Present	Lead Client Administrator Aletheian Wealth Advisors LLC
08/2014 - 05/2019	Client Management Administrator Cornerstone Advisors Inc.
12/2005 - 08/2014	Bookkeeper FineLine Instrument

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Sylvia Jane Gilmore is not engaged in any investment-related business or occupation (other than this advisory firm).



### **Item 5: Additional Compensation**

Sylvia Jane Gilmore does not receive any economic benefit from any person, company, or organization, other than Aletheian Wealth Advisors LLC in exchange for providing clients advisory services through Aletheian Wealth Advisors LLC.

### **Item 6: Supervision**

As a representative of Aletheian Wealth Advisors LLC, Sylvia Jane Gilmore is supervised by Randy T Siegel, the firm's Chief Compliance Officer. Randy T Siegel is responsible for ensuring that Sylvia Jane Gilmore adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Randy T Siegel is (425) 458-2840.