

ABUNDANT WEALTH PARTNERS, LLC

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This brochure provides information about the qualifications and business practices of Abundant Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. 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. Registration (e.g., “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about Abundant Wealth Partners, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov. AWP can also be reached at the following email address: aaron@abundantwp.com. This email address is capable of receiving attachments.

Item 2 Material Changes

Pursuant to California and SEC rules, Abundant Wealth Partners, LLC will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Abundant Wealth Partners, LLC will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Abundant Wealth Partners, LLC at any time by contacting their investment advisor representative.

None since last filing

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ITEM 4 ADVISORY BUSINESS

A. Firm Description

Abundant Wealth Partners, LLC (“AWP” or the “Firm”) is a California registered investment advisor. AWP was founded on September 17, 2021.

The Majority Owner and Chief Compliance Officer of AWP is Aaron Ritter.

B. Types of Advisory Services

The Firm offers a large variety of services, including portfolio management, investment analysis and financial planning for individuals, high net worth individuals, and charitable organizations. The Firm offers these services to clients or potential clients (“clients”).

Wealth Management Services

AWP offers discretionary and non-discretionary asset management services to advisory clients. AWP will offer clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Discretionary

When the client provides AWP discretionary authority, the client will sign a limited trading authorization or equivalent. Accordingly, AWP will be authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of AWP’s fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, AWP does not guarantee any results or returns.

Non-Discretionary

When the client uses AWP on a non-discretionary basis, AWP will determine the securities, and the amount, to be bought or sold. However, AWP will obtain prior approval from the client on every transaction before executing any transaction.

Prior to engaging AWP to provide any wealth management services, AWP requires a written wealth management agreement (“WMA”) signed by the client prior to the engagement of any services. The WMA will outline services to which the client is entitled and fees the client will incur.

AWP is an asset-based fee investment management firm. AWP does not receive commissions for purchasing or selling stocks, bonds, mutual funds, real estate investment trusts, or other commissioned products for clients. AWP is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted.

Financial Planning and Consulting Services

AWP provides a variety of standalone financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives.

Financial planning services will typically involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, or Business and Personal Financial Planning. Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. Implementation of the recommendations will be at the discretion 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 effect the transaction through the investment adviser. AWP provides financial planning clients with a written financial plan. Financial consultations are not typically accompanied by a written summary of observations and recommendations, as the process is less formal than the planning service. Assuming that all the information and documents requested from the client are provided promptly, plans or consultations are typically completed within 3 months of the client signing a contract with AWP. A conflict exists between the interests of the investment adviser and the interests of the client; AWP can possibly receive higher compensation if the client utilizes them for ongoing investment advisory services in addition to, or instead of, a limited-term financial planning-only relationship.

C. Services Tailored to Clients' Needs

Services are provided based on a client's specific needs within the scope of the services provided as discussed above. A review of the information provided by the client regarding the client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

D. Wrap Fee Program

AWP does not offer a Wrap Fee Program.

E. IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;

- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

F. Assets Under Management

As of December 31, 2023, AWP has approximately \$62,400,000 in discretionary assets and \$280,000 in non-discretionary assets.

ITEM 5 FEES AND COMPENSATION

The specific manner in which fees are charged by AWP is established in a client’s written agreement with AWP. AWP will bill its fees in arrears on a quarterly basis. The Firm accepts check, wire, and credit card payments. AWP directly debits fees from client accounts. The client shall pay AWP at the end of each billing period a fee for services as investment advisor based on a percentage of assets under management at the end of each billing period.

Fees for individually managed accounts are tier priced as follows:

Total Managed Portfolio Size:	Fee (Annual Percentage)
• Up to \$1,000,000	1.00%
• \$1,000,001 - \$5,000,000	0.75%
• \$5,000,001 - \$20,000,000	0.50%
• \$20,000,001+	0.25%

AWP typically requires a minimum asset level of \$1,000,000 for its wealth management services’ relationships under this fee schedule, or a minimum annual fee of \$10,000. AWP, in its sole discretion, may waive the required minimum asset or fee level. In the event that the minimum asset or fee level is waived, the fee will be negotiated between the parties. Lower fees for comparable services may be available from other sources.

Certain legacy AWP clients may be waived into a prior fee schedule and fee-billing methodology that differs from the fee schedule and fee-billing methodology described here; such clients should refer to their specific wealth management Agreement for a complete description of the applicable fee schedule and fee-billing methodology.

While AWP fees are not negotiable, AWP, in its sole discretion, may charge a lesser wealth management fee based upon certain criteria (e.g., historical relationship, types of assets, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, etc.).

The wealth management contract with AWP may be terminated at any time upon written notification – Accounts initiated or terminated during a billable month, quarter or year will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Third Party / Custodian Fees

In addition to the advisory fees paid to AWP, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs, fees attributable to alternative assets, reporting charges, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm’s brokerage practices are described at length in Item 12, below.

AWP will provide wealth management services and portfolio management services but will not provide custodial or other administrative services. At no time will AWP accept or maintain custody of a client’s funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. AWP may act at the client’s convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets.

Fee Deduction Disclosure

Where AWP deducts its management fee from client accounts utilizing a qualified custodian, AWP is required to meet the following requirements.

- a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. The firm must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,
- c. The firm must send the client a written invoice itemizing the fee, the invoice must detail any formulae 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. This may be included with the client’s quarterly performance report.

Right of Cancellation

In addition to the right to terminate an agreement pursuant to its terms, a client may cancel an agreement with AWP within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

Financial Planning and Project Based Fee Compensation Description:

AWP wealth management services includes financial planning services at no additional cost to better meet our clients’ needs and desires. However, AWP may offer project-based services for non-wealth management clients for the fees listed below.

AWP charges on an hourly or flat fee for consulting services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. The hourly rate is \$350.00 per hour and flat fees range from \$350 to \$10,000 based on the hourly rate of \$350 and a one hour minimum. AWP does not generally require payment in full until after services are rendered, but

there may be instances when an initial retainer may be required upon execution of the Agreement. Our firm will not require a retainer exceeding \$500 when services cannot be rendered within 6 months.

Clients have the option to purchase investment products that AWP recommends through other brokers or agents that are not affiliated with AWP .

None of AWP's revenue from advisory clients results from commissions or other compensation for the sale of investment products it recommends to clients, including asset-based distribution fees from the sale of mutual funds. Once AWP's revenue can be confirmed, AWP will disclose whether commissions provide AWP any compensation.

AWP in its sole discretion, in addition to markups, can reduce your advisory fees to offset the markups.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

AWP does not charge or accept performance-based fees therefore this question is not applicable.

ITEM 7 TYPES OF CLIENTS

AWP provides investment advice to many different types of clients. These clients generally include individuals, trusts, estates, corporations, and other types of business entities.

AWP requires a minimum portfolio size of \$1,000,000 for its wealth management services. AWP, in its sole discretion, may waive the required minimum asset level. In the event that the minimum asset level is waived, the fee will be negotiated between the parties, but will never exceed 2%. Third-party managed programs generally have account minimum requirements, and these minimum requirements vary from manager to manager.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

AWP may use the following methods when considering investment strategies and recommendations.

Historical Long-Term Risk-Adjusted Return Review

An analysis of long-term risk-adjusted returns is the primary method of initial and ongoing evaluation of any securities in a client portfolio. In examining risk-adjusted returns, the asset class, sub-asset class, sector, etc. are also factored in. This evaluation entails a review of absolute and relative long-term historical total returns versus appropriate benchmarks, as well as long-term historical risk versus appropriate benchmarks, as measured by downside capture ratios, standard deviations, and betas. When relevant, correlation coefficients are also examined to determine a security's potential impact on a diversified portfolio.

AWP generally only performs long-term risk-adjusted return reviews on mutual funds and exchange-traded funds, which are typically only a portion of client portfolios. AWP relies on third party data for these reviews.

Fundamental Review

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, “brand” names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should be sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities

AWP generally only performs fundamental reviews on individual stocks, which are typically only a portion of client portfolios. AWP relies on third party data for fundamental analysis, focusing on several factors, including but not limited to relative valuation, profitability, and balance sheet strength.

Environmental Social Governance (ESG) / Impact Review

If a security has satisfied the risk-adjusted return or fundamental review screens, further evaluation can be performed to evaluate the investment's level of social responsibility, as measured by a combination of third party data and case-by-case internal reviews. AWP allows clients to specify the level of importance of ESG / Impact criteria overall, as well as prioritize certain ESG / Impact themes, through a signed Investment Policy Statement, called an Impact Policy Statement.

Exceptions to These methods

There are a variety of situations in which the methods above are only employed on a limited basis or not at all. The most common reason is to limit the realization of capital gains taxes, particularly when the taxes paid would be substantial versus the potential for superior risk-adjusted returns in a replacement investment. In these situations, investments that do not otherwise satisfy the above criteria might, as an example, only be sold gradually over time, instead of all at once, to limit the tax cost. There are several other situations that may warrant exceptions to the investment evaluation methods that are deemed to be in the best interests of the client and/or directed by the client specifically.

A. Investment Strategies

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objects of clients. Depending on market trends and conditions, AWP will employ any technique or strategy herein described, at the Firm's discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client's financial objectives. There is inherent risk to any investment and clients may suffer loss of ALL OR PART of a principal investment.

Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose clients to various other 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, and political/regulatory risk.

Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

B. Risk of Loss

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. AWP does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry

changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depository Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by AWP plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by AWP may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/ Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with AWP may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their out tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience

computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. AWP and its representatives are not responsible to any account for losses unless caused by AWP breaching our fiduciary duty.

Dependence on Key Employees. An account's success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

AWP does not primarily recommend a particular type of security.

ITEM 9 DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the advisory business or integrity of the Firm's management.

AWP has no disciplinary disclosures. Aaron Ritter, the majority owner and operator of AWP, has no disciplinary disclosures.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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

AWP is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative.

B. Registration as a Futures Commission merchant, Commodity Pool Operator

AWP and its management persons are not registered and do not have application pending to register as a futures commission merchant or a commodity pool operator/advisor.

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

None

D. Selection of Other Advisors

AWP does not recommend or select other investment advisers for its clients.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Fiduciary Status

According to California law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. AWP and its representatives have a fiduciary duty to all clients. AWP and its representatives' fiduciary duty to clients is considered the core underlying principle for AWP's Code of Ethics and represents the expected basis for all representatives' dealings with clients. AWP has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives

will conduct business in an honest, ethical, and fair manner. All representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

B. Personal Trading

AWP and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. AWP has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser.

In addition, the Code of Ethics governs personal trading by each employee of AWP deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of AWP are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

AWP collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. AWP's Code of Ethics is available upon request. Any material conflicts of interest of AWP have been disclosed.

AWP allows its Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of its clients. This presents a conflict of interest that must be disclosed to Clients and mitigated through policies and procedures. A conflict of interest exists if personal trades by Supervised Persons are made ahead of client transactions or by trading based on material non-public information. AWP mitigates this risk by requiring Supervised Persons to report personal securities trades by conducting a review of personal accounts and the accounts of the Clients. AWP has adopted written policies and procedures to detect the misuse of material, non-public information. AWP has adopted a Code of Ethics that governs gifts and entertainment, outside business activities, and personal securities reporting to prevent the conflict of interest raised by personal trading of Supervised Persons.

ITEM 12 BROKERAGE PRACTICES

A. Selection and Recommendation

AWP has a duty to select brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration. The broker-dealers AWP currently utilizes are Charles Schwab/TD Ameritrade.

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, AWP considers the following factors, without limitation, in selecting brokers and intermediaries:

1. Execution capability;
2. Order size and market depth;
3. Availability of competing markets and liquidity;
4. Trading characteristics of the security;
5. Availability of accurate information comparing markets;
6. Quantity and quality of research received from the broker dealer;
7. Financial responsibility of the broker-dealer;
8. Confidentiality;
9. Reputation and integrity;
10. Responsiveness;
11. Recordkeeping;
12. Ability and willingness to commit capital;
13. Available technology; and
14. Ability to address current market conditions.

AWP evaluates the execution, performance, and risk profile of the broker-dealers it uses at least annually.

B. Research and Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC and California rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a “safe harbor,” which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

AWP does not currently have any soft dollar benefit arrangements.

C. Brokerage for Client Referrals

AWP does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

D. Directed Brokerage.

AWP does not permit its clients to direct brokerage to a particular broker-dealer. As noted above, AWP recommends clients utilize Charles Schwab for custodian services. This arrangement generally allows the client to obtain attractive brokerage rates and professional execution through custodians' affiliated broker-dealers. Custodians may charge the client additional "trade away" fees when trades are executed by another broker-dealer, and therefore in most instances it is advantageous for AWP to execute through the client's custodian in order to avoid these additional costs.

E. Order Aggregation

AWP may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g., for the purposes of reducing brokerage commissions or obtaining a more favorable execution price).

Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of AWP's wealth management agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day.

Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement.

If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. AWP may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

ITEM 13 REVIEW OF ACCOUNTS

A. Periodic Reviews

The Firm regularly reviews and evaluates client accounts for compliance with each client's investment objectives, policies and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of AWP and shall occur at least once per calendar year.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation,

inheritance, etc.). Clients are advised to notify AWP promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. Reports

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

D. Financial Plans

All financial planning accounts are reviewed upon financial plan creation and plan delivery by AWP. There are multiple levels of review for each financial plan. Each financial planning client will receive the financial plan upon completion.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. Client Referrals

AWP will not receive any economic benefit from another person or entity for soliciting or referring clients.

B. Other Compensation

AWP will not pay another person or entity for referring or soliciting clients for AWP.

ITEM 15 CUSTODY

AWP exercises limited custody over the client's funds by direct debit management fees from the account. Where AWP deducts its management fee from client accounts utilizing a qualified custodian, the State of California requires the firm to meet the following requirements:

- a. AWP must possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. AWP must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,
- c. AWP must send the client a written invoice itemizing the fee, the invoice must detail any formulae 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. This may be included with the client's quarterly performance report.

The client will also receive written statements no less than quarterly from the custodian. AWP encourages clients to carefully review their account statements for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

ITEM 16 INVESTMENT DISCRETION

AWP generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by AWP in an investment policy statement.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by AWP will be in accordance with each client's investment objectives and goals and consistent with the Investment Policy statement.

The Client must understand that gains and losses are realized by discretionary activity and that these are taxable events, and that the client has authorized such activity in granting discretion. While some sensitivity to taxation is possible with discretion, if the client requires control of the taxable events, a non-discretionary approach is needed and therefore recommended, and this would require that the client's investment contract indicate the account is non-discretionary.

ITEM 17 VOTING CLIENT SECURITIES

AWP will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, AWP cannot give any advice or take any action with respect to the voting of these proxies. The client and AWP agree to this by contract.

For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. Also, AWP cannot give any advice or take action with respect to the voting of these proxies.

ITEM 18 FINANCIAL INFORMATION

A. Balance Sheet Requirement

AWP does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

B. Financial Condition

AWP has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If AWP does become aware of any such financial condition, this brochure will be updated and clients will be notified.

C. Bankruptcy Petition

AWP has not been the subject of a bankruptcy petition at any time during the last 10 years.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Identify each of your principal executive officers and management persons, and describe their formal education and business background.

Aaron D. Ritter is the Principal Executive Officer Abundant Wealth Partners, LLC. He is also the Chief Compliance Officer. His individual CRD number is 5175154.

For additional information about Aaron Ritter, please see Form ADV Part 2B Item 2.

B. Describe any business in which you are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

For additional information about Aaron Ritter, please see Form ADV Part 2B.

C. In addition to the description of your fees in response to Item 5 of Part 2A, if you or a supervised person are compensated for advisory services with performance-based fees, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

AWP does not charge performance-based fees.

D. If you or a management person has been involved in one of the events listed below, disclose all material facts regarding the event.

Aaron Ritter has not been involved in any of the events listed below:

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. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

AWP and Aaron Ritter do not have any relationship with any issuer of securities.

FORM ADV PART 2B

Aaron Ritter

ABUNDANT WEALTH PARTNERS, LLC

4961 La Gama Way

Santa Barbara, CA 93111

www.abundantwp.com

(805) 451-9131

March 2023

This brochure supplement provides information about Aaron Ritter that supplements the Abundant Wealth Partners, LLC brochure. You should have received a copy of that brochure. Please contact Aaron Ritter if you did not receive Abundant Wealth Partners, LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Aaron Ritter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 1 Brochure Supplement

This brochure supplement provides information about Aaron Ritter that supplements the Abundant Wealth Partners, LLC brochure. His individual CRD number is 5175154. Please contact Aaron Ritter at (805) 451-9131 if the Firm brochure was not provided. Abundant Wealth Partners, LLC business address is 4961 La Gama Way, Santa Barbara, CA 93111. Additional information about Aaron Ritter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Aaron D. Ritter

Year of Birth: 1984 Education:

06/2006 – University of California, Santa Barbara, Bachelor of Arts in Political Science

10/2014 – College for Financial Planning, Master of Science in Financial Planning

12/2021 to Present: Abundant Wealth Partners, LLC, Managing Member, Investment Adviser Representative

10/2017 to 12/2021: Avalan, LLC, Wealth Manager, Investment Adviser Representative

08/2017 to 10/2017: Abundant Wealth Partners, LLC, Managing Member, Investment Adviser Representative

06/2016 to 08/2017: Sole Proprietor dba Abundant Wealth Partners, Investment Adviser Representative

09/2006 to 06/2016: West Coast Financial, LLC, Investment Advisor

Professional Designations:

09/2009 – Certified Financial Planner™, CFP®

We may list any professional designations held by Mr. Ritter, we must provide you with a sufficient explanation of the minimum qualifications required for each designation to allow you to understand the value of the designation.

The **CERTIFIED FINANCIAL PLANNER™, CFP®** and federally registered CFP (with flame design 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. Currently, more than 73,000 individuals have obtained CFP® certification in the United States.

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, administered in two 3-hours testing sessions over a one-day period, 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:

- 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
- 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.

Item 3 Disciplinary Information

Mr. Ritter does not have any legal or disciplinary information to disclose.

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.

Adviser has nothing to report under this section.

Item 4 Other Business Activities

None

Item 5 Additional Compensation

Neither Adviser nor any of its supervised persons is compensated in any way other than the investment advisory fees described above.

Item 6 Supervision

Aaron Ritter is the managing partner of Abundant Wealth Partners. He is the majority owner and Chief Compliance Officer and as such has no internal supervision placed over him. However, he is bound by our firm's Code of Ethics.

Item 7

Aaron Ritter has not been involved with any arbitration or administrative proceeding events.
Aaron Ritter has not been the subject of a bankruptcy petition.