

DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1
Part 2A of Form ADV: Firm Brochure

Firm IARD/CRD #: 282467

AVENTAIL WEALTH MANAGEMENT LLC

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BROCHURE
DATED

**27
March
2019**

This Disclosure Brochure provides information about the qualifications and business practices of Aventail Wealth Management, LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed above. Additional information about Aventail Wealth Management, www.adviserinfo.sec.gov.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Aventail Wealth Management, LLC has attained a certain level of skill or training.

MATERIAL CHANGES

ITEM 2

SEC Rule 204-3(b)(2) allows us to provide you with a summary page of Material Changes in lieu of sending out our entire Disclosure Brochure. If you are being offered this Material Change page as a separate piece from our Disclosure Brochure and you have questions about these summary disclosures or would like a current copy of our Disclosure Brochure to review, **you may contact us and a current, complete Disclosure Brochure will be sent free of charge.**

There are no material changes in this brochure from the last annual updating amendment of Aventail Wealth Management LLC on 02/22/2018. Material changes relate to Aventail Wealth Management LLC policies, practices or conflicts of interests only.

Aventail Wealth Management, LLC

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This brief is being provided to you as a summary of what has been fully disclosed in our Disclosure Brochure dated March 27, 2019. The information contained on this Material Change page has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator.

TABLE OF CONTENTS

ITEM 4	Advisory Business	4
	Who We Are	4
	Assets Under Management	4
	What We Do	4
ITEM 5	Fees & Compensation	8
	Discovery Meeting	8
	Portfolio Management Fee	8
	Financial Planning Fee	10
	General Consulting Fee	11
ITEM 6	Performance-Based Fees & Side-By-Side Management	11
ITEM 7	Types of Clients	11
ITEM 8	Methods of Analysis, Investment Strategies & Risk of Loss	12
	Methods of Analysis	12
	Investment Strategy	13
	Managing Risk	15
ITEM 9	Disciplinary Information	15
ITEM 10	Other Financial Industry Activities & Affiliations	15
	Insurance Company Activities & Affiliations	15
ITEM 11	Code of Ethics, Participation or Interest in Client Transactions & Personal Trading	16
	Code of Ethics	16
	Client Transactions	16
	Personal Trading	17
ITEM 12	Brokerage Practices	17
	Custodial Services	17
	Aggregating Trade Orders	18
ITEM 13	Review of Accounts	19
	Portfolio Management Reviews	19
	Financial Planning Reviews	19
ITEM 14	Client Referrals & Other Compensation	19
	Referral Compensation	19
	Other Compensation (Indirect Benefit)	20
	Financial Planning Compensation	20
ITEM 15	Custody	21
	Management Fee Deduction	21
ITEM 16	Investment Discretion	21
ITEM 17	Voting Client Securities	22
ITEM 18	Financial Information	22
ITEM 19	Requirements for State-Registered Advisers	22

BROCHURE SUPPLEMENTS

ADVISORY BUSINESSITEM
4**Who We Are**

Aventail Wealth Management, LLC (hereinafter referred to as “Aventail”, “the Company”, “we”, “us”, and “our”) is a fee-based registered investment advisor , organized in November 2015, to offer advisory services designed to assist you, our client , achieve long-term growth and capital appreciation and/or income in your investment portfolio.

Owners

The following persons control the Company:

Name	Title	CRD#
Brian C. Ulch	Managing Member & Portfolio Manager	6596245
Carol L. Shira	Managing Member & Chief Compliance Officer	6596246

Our Mission

Aventail is committed to using the strength we have acquired through decades of experience in combination with the flexibility to work with your unique life circumstances to protect and grow your hard earned wealth. Our perpetual focus is to deliver, throughout your lifetime, a holistic wealth management process that creates and sustains complete financial comfort.

Assets Under Management

As of December 31, 2018, our assets under management totaled:

Discretionary Accounts	\$10,268,758.00
Non-Discretionary Accounts	\$3,571,166.00

What We Do

We manage wealth. Our management services begin with stressing the importance of you making fiscally responsible decisions and disciplined economic choices in your personal life so we can effectively help you achieve your monetary goals for **today’s needs**, and **tomorrow’s dreams**. This strategy is built for multiple generations.

Focus of our management begins with identifying your standards of living and quality of life expectations. We will accomplish this through an initial Discovery Meeting where we have you complete a profile questionnaire and review financial documents we may have requested you

² The term “registered investment advisor” is not intended to imply that Aventail Wealth Management, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “Registered” as an “Investment Advisor” with the Florida Office of Financial Regulation - and with such other regulatory agencies that may have limited regulatory jurisdiction over our business practices.

³ A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.

The information we gather from you through personal interviews and questionnaires is vital for us to effectively advise you on your unique financial needs and help you plan for your future. Electing to dismiss certain requested documents or respond to questions with limited input can put us at a disadvantage and handicap our ability to successfully meet your financial expectations. Therefore, if you want the best advice we can offer in designing a financial plan, if request, or with any portfolio management, you should make every effort to provide us with detailed personal information and be as accurate with your responses as you possibly can.

bring for discussion. Together questions will be asked, information shared, and an evaluation made as to whether we should move to the next step. During the meeting, we will:

- v Learn about your core values and guiding principles
- v Seek to understand your financial concerns and how you have been addressing them
- v Discover your financial objectives and what success looks like for you
- v Create an internal profile consisting of your concerns, objectives, relationships, values, interests, assets, professional advisors and process preferences

Moving forward from the Discovery Meeting, should you choose to engage us for our advisory services, we will begin the process of identifying your life goals (i.e., core values, family, monetary needs, future plans, investment expectations, etc.). The best advice we could offer you is that success, achievement, and contentment in life have little to do with personal wealth but are instead related to your life goals. We will make every effort to embrace these life goals and develop economic solutions that reflect how **you** define true wealth -- not us. Our services include:

Portfolio Management

Once your life goals have been identified, we will prepare an Investment Policy Statement (“IPS”) that outlines what asset mix is most suitable for your unique investment expectations and risk tolerance. We will use primarily Exchange-Traded Funds (“ETFs”) and Investment Company (“mutual fund”) products, along with the occasional mix of equity (“stock”) positions and fixed income/debt (“bond”) instruments to achieve a solid risk-adjusted rate of return on your investment capital .⁴

Information regarding our management fee structure is disclosed under “Portfolio Management Fee” in Item 5, “Fees & Compensation” and further description of our investment strategies under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss”.

Financial Planning

Financial planning is an essential tool to help navigate unexpected events with the ultimate goal of providing the confidence and security necessary during both the working years (wealth accumulation) and retirement years (wealth distribution) of your life. However, such planning requires a lifetime commitment, not only from you but from us as well, your Financial Planner.

What is a Financial Plan?

Financial planning is an evaluation of the investment and financial options available to you based upon your defined life goals and choices. A well-designed plan is a step-by-step process intended to identify and clarify purpose, personal and family core values, needs, and priorities to align your financial decisions with your goals in all areas of your life and business. Planning includes:

1. Arriving at a series of decisions and action items based on current and future financial circumstances and defined goals and objectives;
2. Projecting the consequences of these decisions for you in the form of an economic plan - **a working blueprint**; and,
3. Implementing the protocols outlined in the plan to achieve the plan objectives.

⁴ You may, at any time, impose restrictions in writing on the securities we may recommend (i.e., limit the types/amounts of particular securities purchased for your account, etc.).

Once complete, the financial plan, or working blueprint, becomes the benchmark that is used to help us evaluate where you are in achieving your financial goals, needs, and objectives.

Financial Planning Composition

All forms of financial planning are a mutually defined review, analysis and evaluation of your personal financial needs and goals. In general, our financial planning may encompass one or more of the following areas of financial need as communicated by you:

- √ Identify and clarify personal and family core values, mission, vision, and goals.
 - √ Preparation of the financial plan, which encompasses your:
 - Current financial situation.
 - Liquidity and asset preservation needs.
 - Wealth accumulation and growth.
 - Wealth distribution and transfer.
- More specifically planning may include, but is not limited to, the following modules:
- Financial Statements - Cash Flow and Balance Sheet.
 - Savings and Emergency Reserves.
 - Asset Allocation and Investment Portfolio Analysis.
 - Potential Income Tax consequences in collaboration with your tax advisor.
 - Risk Management and Insurance Analysis.
 - Retirement Income Analysis.
 - Long-Term Healthcare.
 - Estate and Family Legacy Planning.
 - Business Succession Planning.
- √ Outline of recommendations, strategies, solutions and resources.
 - √ Prioritizing and implementing the written action plan.
 - √ Investment consultations that allow us to create and implement a customized investment strategy tailored to your long-term investment goals.
 - Prepare a professional investment proposal that can include a written Investment Policy Statement (“IPS”), if requested.
 - Access to our open-architecture platform with a variety of investment management solutions.
 - √ Facilitate meetings with you and/or advisors or specialists within our professional network.
 - √ Coordinate and facilitate meetings with family members, business associates, partners or other key individuals to assist with implementing your action plan.

Preparing the Financial Plan

Once the analysis has been completed, we begin formally documenting your objectives. This is the creative portion of the planning process. There are usually several ways to accomplish a given goal; however, our purpose will be to integrate only those financial instruments and strategies into a plan that **you will be comfortable executing**. In some cases, the drafting of the plan reveals the need for us to help you reconcile the gap between your expectations and your financial realities. Once a viable plan has been drafted, it is presented to you and reviewed. The draft and review process may be repeated until you are satisfied with the financial plan or the scope of work has been completed.

Implementing the Financial Plan Recommendations

A financial plan is of limited value if it is not put into action. Accordingly, we assist you with implementing the plan. The action plan schedule provides you with a list of tasks and deadlines designed to ensure that **you put your plan into action**. The following are some examples of implementation:

- ✓ Drafting of appropriate estate documents (performed in conjunction with an estate attorney).
- ✓ Purchase of various insurance policies (provided by our licensed insurance agents or another independent insurance agent of your choice).
- ✓ Investment advisory services, including preparation of an Investment Policy Statement (“IPS”) and implementing your asset allocation strategy (performed by us, or another investment adviser/broker-dealer of your choice).
- ✓ Adopting and monitoring of a personal budget.
- ✓ Ongoing income tax planning (performed in conjunction with independent Certified Public Accountant or tax accountant).

Monitor the Financial Plan Recommendations

Once the financial plan has been built and the recommendations have been implemented it is critical that these recommendations be monitored on a continuing basis to ensure that they remain consistent with your financial parameters. **Material changes in your personal circumstances, the general economy, changes in the way you want your investments allocated, or tax law changes are some of the reasons why the recommendations should be reviewed periodically and possibly adjusted**

For information on our fees for financial planning, see “Financial Planning Fee” under Item 5, “Fees & Compensation.”

General Consulting Services

We also offer **general consulting services**, which are independent of all other services. Under this arrangement, we do not provide any on-going investment management or financial planning services. Such consulting may include, but is not limited to:

- ✓ General and/or specific advice on non-managed investments
- ✓ General and/or specific financial planning advice
- ✓ Independent retirement plan benchmarking and cost analysis
- ✓ General and/or specific life insurance or annuity contract review and recommendations
- ✓ General and/or specific divorce planning advice

For information on our fees for consulting services, see “General Consulting Fee” under Item 5, “Fees & Compensation.”

⁵ Implementing the recommendations made in a financial plan often requires consultation or coordination with one or more outside professionals (e.g. attorneys, CPAs, insurance agents, and securities representatives). All personal and private information received from you will be kept entirely confidential, not only by us, but by the outside professionals as well. Your confidential information will be disclosed to third parties only with your consent or as may be permitted or required by law.

FEES & COMPENSATION

Discovery Meeting

Prior to conducting any advisory services on your behalf, we may schedule a Discovery Meeting to review the financial documents we requested you bring for discussion and have you complete a profile questionnaire. We will inform you on whether we will bill you for our time. Such fee will be **based on our hourly rate not to exceed \$150 per hour**. The objectives we strive to accomplish with you during this meeting are to:

- v Diagnose your current financial need;
- v Address your financial concerns and answer your questions on how we can assist you;
- v Recommend financial resolutions aimed at lowering costs, reducing risks, increasing expected returns, and/or increasing tax efficiency to improve the likelihood of successfully achieving your goal; and,
- v Explain the benefits of financial planning, if needed, and how a comprehensive evaluation of wealth management needs is beneficial beyond just managing your investable assets.

Should a fee be negotiated prior to the Discovery Meeting, such fee will be due at the end of the session. If additional planning is requested, we will reduce the cost of any engagement by the amount of the fee paid.

If you wish no further interaction with us, you will be responsible for implementing any recommendations coming out of the Discovery Meeting. Once this session is over, all investment advice and financial planning recommendations will have been concluded and we are not responsible to implement the advice or for any on-going supervision, monitoring, and/or reporting.

Portfolio Management Fee

Our portfolio management service is provided on an **asset-based fee** arrangement. The management fee will be calculated based on the **aggregate market value** of your portfolio account(s) on the last business day of the previous calendar month **multiplied by one-twelfth** (e.g., $1.25\% \div 12 = 0.1042\%$) of the corresponding annual percentage rate **for each portion of your portfolio assets that fall within each tier – a blended fee**. See “Billing” below under “Protocols for Portfolio Management” for more information on how the fee is calculated.

We retain **discretion to negotiate the management fee within each tier** on a client-by-client basis depending on the size, complexity, and nature of the portfolio managed. The tier breaks are as follows:

Portfolio Value	Annual Fee Rate Not to Exceed
First \$1,000,000	1.25%
Next \$2,000,000	1.00%
Over \$3,000,000	0.60%

We have a **\$1,200 minimum annual fee** requirement (\$100 billed monthly), which **may be waived or reduced** if we feel circumstances are warranted. Accounts with **portfolio values**

that fall below \$100,000 will be subject to this minimum annual fee, which can cause our fee to exceed our highest published 1.25% Annual Fee Rate (e.g., a managed account of \$75,000 with a minimum annual fee charge of \$1,200, will translate into an annual fee rate of 1.60%). **Keep in mind, the further your portfolio value drops below \$100,000 the higher the annual fee rate.**

Protocols for Portfolio Management

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawing funds from your account(s); and (iv) other fees charged to your account(s).

Discretion

We will establish discretionary trading authority on all management accounts to execute securities transactions without your prior consent or advice.

You may, at any time however, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, etc.).

Billing

Your account will be **billed monthly in advance** based on the fair market value for the portion of your portfolio that **falls within each tier** of our fee schedule.

As your portfolio value exceeds into the next tier level, either through additional deposits or asset growth, the amount of assets above the fee-break will be billed the corresponding annual fee rate. This results in a blended fee and **effectively lowers the annual fee costs** to manage your portfolio.

An example of how the value of your portfolio lowers our management fee billed to your account:

Sample Account Value: \$4,500,000

Tier Fee-Breaks	Annual Fee % (Per Tier)	Tier Fee Contribution (Based on the Account Value Within Each Tier)
First \$1,000,000	1.25%	0.28%
Next \$2,000,000	1.00%	0.44%
Over \$3,000,000	0.60%	0.20%
Blended Annual Fee %		0.92%

For **new managed** accounts opened in mid-month, our fee will be based upon a **pro-rated calculation of your assets to be managed** for the current calendar month. For **existing management accounts**, depositing additional capital in your investment portfolio between billing cycles will **not** generate a partial, pro-rated management fee to be billed to your account - we do not want to discourage you from investing in your future. However, for withdraws made from your managed portfolio account between billing cycles, we **do not make partial refunds** of our monthly fee.

Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Fee Exclusions

The above fees for our management services are exclusive of any charges imposed by the custodial firm who has custody of your portfolio; including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or portfolio account charges, such as, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed portfolio account. There can also be other fees charged to your portfolio that are unaffiliated with our management services.

In addition, all fees paid to us for investment management are separate from any fees and expenses charged on mutual fund shares by the Investment Company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: 12b-1 fees. Redemption fees, account fees, purchase fees, contingent deferred sales charges, and other sales load charges may occur but are the exception within managed portfolio accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus.

Termination of Portfolio Management Services

To terminate our portfolio management services, either party (you or us), by **written notification to the other party**, may terminate the Investment Advisory Agreement at any time, provided such written notification is received **at least 10 days** prior to the date of termination. Such written notification should include the date the termination will go into effect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the first/last day of a calendar month, **you shall be entitled to a pro-rated refund** of the prepaid monthly management fee based upon the number of days remaining in the monthly cycle after the termination notice goes into effect. **Once the termination of investment advisory services has been implemented, neither party has any obligation to the other** - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

Financial Planning Fee

The cost to prepare a financial plan depends on the scope of engagement, complexity of service requested, the nature of your personal and financial situation, and any other factors that may affect the project to perform the services you desire.

Financial planning services are offered on a **negotiable hourly rate not to exceed \$150 per hour** for the initial engagement. At minimum, **we require two (2) hours of initial consultation** to conduct an adequate interview to determine your monetary needs, financial goals, and investment objectives to then prepare the planning documents you desire.

Planning fees may be significantly **reduced, or waived, if we manage over \$100,000 of your portfolio account (s)**. The Financial planning fee will be fully disclosed up-front in a Financial Planning Agreement, which will include the cost to⁶ review your personal/financial information

⁶ Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract with you to perform a particular task and therefore merit notifying you of the additional cost prior to beginning such services.

and prepare the financial planning documents. Our preference is for the fee to be paid in full up front; however, we will also accept one-half the fee at the time the Agreement is signed, with the remaining balance due upon completion of the financial plan .⁷

Financial Planning Termination

You can terminate the Financial Planning Agreement at any time prior to the presentation of any final planning documents. We will be compensated through the date of termination for time spent in design of such financial documents at the hourly rate agreed to in the Agreement. If you have prepaid any fees, such un-earned fees will be returned on a pro-rata basis. **After the financial plan has been completed and presented to you, termination of the Agreement is no longer an option.**

General Consulting Fee

General consulting is independent of our portfolio management and financial planning services. **Under this arrangement, we do not provide any on-going management of your account or give continuous investment advice.** We will perform the desired task but **you are responsible** for implementing any of the advice.

Our general consulting fee is a **negotiable hourly rate not to exceed \$150 per hour** for our advice. All consulting fees will be completely itemized in a billing statement or consulting agreement. For the initial consultation, the fee will be due at the end of the session. Thereafter we will bill you at the agreed upon hourly rate, should we be contacted by you for future reviews and advice.

General consulting services can be terminated at any time.

PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under “Who We Are” in the Item 4, the “**Advisory Business**” section. Our minimum account size for portfolio management is disclosed above under “Portfolio Management Fee” in Item 5 above in the, “**Fees & Compensation**” section of this Brochure.

⁷ The recommendations made in an estate plan are generally completed within 30 to 45 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc.) may require additional time that is out of our control. Therefore, when we refer to the completion of the estate plan, we are referring to us (you and us together) finalizing your estate benchmarks/objectives before approaching any outside professional.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

Our portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy as outlined in your Investment Policy Statement (“IPS”). Your portfolio is then tailored to these unique investment parameters using primarily Exchange-Traded Funds (“ETFs”) and Investment Company (“mutual fund”) products, along with the occasional mix of equity (“stock”) positions and fixed income/debt (“bond”) instruments to achieve a solid risk-adjusted rate of return.

Methods of Analysis

In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gathering information and to guide us in our management decisions.

Fundamental Analysis

Fundamental analysis considers: efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

RISKS - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the market place. Investing in companies with sound financial data/strength and a history of health returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

Quantitative Analysis

Quantitative analysis seeks to understand the behavior of a security using mathematical and statistical modeling to measure certain unique characteristics such as, for example, revenues, earnings, margins, and market share. Mathematical and statistical modeling helps us to ascertain security price and risk to ultimately help identify profitable opportunities.

RISKS - The key benefit of quantitative analysis is its ability to reduce complex figures to a single piece of data that is easy to grasp, discuss, and support decision-making and investment recommendations. However, using quantitative analysis alone with no further evaluation is often too narrow and sometime misleading since focus is on financial data while neglecting other details such as management experience, employee attitudes, and brand recognition.

Technical Analysis

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

RISKS - Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the market place. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

Cyclical Analysis

Market cycles provide historic tried and true timing mechanisms to indicate turning points in future market prices. By tracking historic data through charts and graphs we can improve entry and exit strategies.

RISKS - Cyclical data reveals regular intervals of repeated events that can be forecasted into the future to time the market on when to buy/sell a security. The risk with cyclical analysis is attempting to buy/sell a security based on a future price prediction and missing beneficial movements in price due to an error in timing. This causes harm to the value of the security being bought too high or sold too low.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **quantitative analysis** assists us with portfolio optimization techniques. **Technical analysis** is short-term focusing on the statistics generated by market activity; and, **cyclical analysis** provides us with historical data on market trends to focus our technical analysis for ideal entry/exit points.

Investment Strategies

We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk (volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short-term gains.

Value Investing

Value Investing involves selecting securities that trade for less than their intrinsic values, being more concerned with the business and its fundamentals than other influences on the stock's price. Value investing is about finding stocks that we believe the market has undervalued. We perform fundamental analysis of a company's stock looking at both the qualitative (business model, governance, earning potential, target market factors, etc...) and quantitative (ratios, cash flow, dividends, financial statement analysis, etc...) aspects of the company to determine if the business is currently out of favor with the market and the stock price is deflated. Generally if we find that a company's fundamentals reveal the stock to be undervalued, we will buy and hold the security for the long term.

Asset Allocation

Asset allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. From this we may use more narrow and aggressive asset allocation derivatives. We have developed five model portfolio structures that are used as asset allocation guideline models in designing your investment portfolio.

Each model consists of a different “target” asset allocation comprised of different asset classes⁸ - spreading money among a variety of investments as opposed to investing in just one - creating a more prudent approach to managing risk. The investment mix is uniquely designed to achieve your desired investment return. The selected stocks, bonds, and other investment vehicles in your investment portfolio are diversified to reflect their risk profile.

Asset Allocation Model	Percentage of			
	Equity	Fixed Income	Alternative	Cash
Capital Growth	50% - 90%	0% - 20%	10% - 35%	0% - 10%
Growth w/ some Volatility Minimization	40% - 75%	10% - 50%	10% - 35%	0% - 10%
Balanced	25% - 65%	25% - 65%	10% - 35%	0% - 10%
Volatility Minimization w/ some Growth	5% - 30%	30% - 70%	10% - 25%	0% - 10%
Volatility Minimization	0% - 20%	50% - 80%	10% - 25%	0% - 10%

Such allocation guidelines are a representation of a typical account composition but should not be construed as absolute. Ultimately, the exact composition makeup and allocation of securities are determined by your investment parameters, which can compose a more detailed and/or complex structure.

Other features of our asset allocation strategies can utilize these portfolio modeling structures for analyzing various possible portfolio groupings of securities.

Modern Portfolio Theory

Modern Portfolio Theory (“MPT”)⁹ is the analysis of a portfolio of stocks as opposed to selecting stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk and then construct a portfolio that seeks to maximize your expected return for that given level of risk.

Tactical Allocation Modeling

Tactical asset allocation is a dynamic investment strategy that actively rebalances a portfolio allocation mix to take advantage of short-term market pricing anomalies or strong market sectors.

Capital Asset Pricing Model (“CAPM”)

CAPM¹⁰ is a model for pricing an individual security or portfolio and its relationship to an expected return to help calculate investment risk and what the return on an investment should be expected.

Sharpe Ratio Model

Sharpe Ratio¹¹ is a risk-adjusted measure of return often used to evaluate the performance of a portfolio. The Sharpe Ratio is the average return earned in excess of the risk-free rate per unit of volatility.

⁸ The different asset classes are: Large-Cap U.S. Value Stocks; Large-Cap U.S. Growth Stocks; Mid-Cap U.S. Value Stocks; Mid-Cap U.S. Growth Stocks; Small-Cap U.S. Value Stocks; Small-Cap U.S. Growth Stocks; International Stocks; Commodity Funds; Fixed Income, Partnerships, REITS, and Cash.

⁹ The “Portfolio Theory” was developed and introduced by Harry M. Markowitz in his paper “Portfolio Selection” published in 1952 by the *Journal of Finance* while he was working on his PhD doctoral thesis at the University of Chicago. Mr. Markowitz further refined his theory during the latter part of the 1950’s and on into the 70’s. Along the way, his theory became known as the “Modern Portfolio Theory”. Mr. Markowitz won the Nobel Memorial Prize in Economic Sciences in 1990 as a co-laureate along with William Sharpe.

¹⁰ Capital Asset Pricing Model is the work of financial economist William Sharpe and introduced in his book “Portfolio Theory and Capital Markets” published in 1970 by *McGraw-Hill*. Mr. Sharpe expanded Modern Portfolio Theory to include two types of risk: Systematic Risk and Unsystematic Risk. Mr. Sharpe won the Nobel Memorial Prize in Economic Sciences in 1990 as a co-laureate along with Harry Markowitz.

¹¹ Nobel laureate and economist William F. Sharpe developed the Sharpe Ratio.

Dollar-Cost Averaging

Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- v **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- v **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- v **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in internationally securities can be affected by changes in exchange rates.
- v **Inflation Risk** - The reduction of purchasing power of investments over time.
- v **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list, but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, over-concentration, and liquidity to name a few. However, notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear**; and furthermore, **past market performance is no guarantee that you will see equal or better future returns on your investment**.

DISCIPLINARY INFORMATION

We have no legal or disciplinary events to report.

ITEM 9

OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

Insurance Company Activities & Affiliations

Brian C. Ulch is licensed as a life and annuity insurance agent by the State of Florida and as a non-resident agent in California and Illinois. As an agent, Mr. Ulch is licensed to sell insurance-related products and earn commissions from the sale of these products. A conflict of interest can potentially occur when Mr. Ulch, as a trusted advisor managing your portfolio for a fee, recommends you purchase an insurance product in which he will earn a commission. This can

ITEM 10

create a situation of divided loyalty and the objectivity of the advice we render could be subjective and create a disadvantage to you.

Therefore, keep in mind you are under no obligation to accept Mr. Ulch's recommendation to purchase insurance related products. **You are free to reject his recommendation** or, if you need the insurance, to choose the insurance agency, agent, and insurance company from whom to purchase the insurance. However, if you elect to purchase the insurance, regardless of where, and from whom you purchase it, such person will be entitled to earn a commission..

For further information on potential conflicts and economic benefits from Mr. Ulch's activity as an insurance agent, see "Financial Planning Compensation" below under Item 14, "**Client Referrals & Other Compensation**" of this Brochure.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim - do the right thing. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- v Honest and ethical conduct.
- v Full, fair and accurate disclosure.
- v Compliance with applicable rules and regulations.
- v Reporting of any violation of the Code.
- v Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

Client Transactions

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

Participation or Interest

It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer, and such investment is not in violation of any SEC and/or State rules and regulations.

Insider Trading Policy

We comply with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and has set-up internal controls to guard your personal information.

Class Action Policy

The Company, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

Personal Trading

Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made in an employee's account. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative ("RA"), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. We maintain a list of all securities holdings for all our access employees. Our Chief Compliance Officer reviews these holdings on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See "Aggregating Trade Orders" below under Item 12, "**Brokerage Practices**") may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by the Chief Compliance Officer to ensure that such activities do not impact upon your security or create conflicts of interest.

BROKERAGE PRACTICES

ITEM 12

Custodial Services

The Company maintains a custodial relationship with Charles Schwab & Company, Inc., a registered broker-dealer (member FINRA/SIPC), through their division Schwab Advisor Services for investment advisors. Schwab offers us services, which include custody of securities, trade execution, clearance and settlement of transactions.

Our recommendation for you to custody your assets with Schwab has no direct correlation to the services we receive from Schwab and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with Schwab that are typically not available to Schwab retail clients. This creates an incentive for us to recommend Schwab based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- v Receipt of duplicate client statements and confirmations;
- v Research related products and tools and consulting services;
- v Access to a dedicated trading desk;
- v Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts);
- v The ability to have advisory fees deducted directly from accounts;
- v Access to an electronic communications network for order entry and account information; and,
- v Access to mutual funds and ETFs with no transaction fees and to certain institutional money managers.

We are not a subsidiary of, or an affiliated entity of, Schwab. We have sole responsibility for investment advice rendered, and **our advisory services are provided separately and independently from Schwab.**

Direction of Transactions and Commission Rates (Best Execution)

We have a fiduciary duty to put your interests before our own. The advisory support services we receive from Schwab creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with Schwab may have been influenced by these arrangements/services. **This is not the case;** we have selected Schwab as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with Schwab staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab, **best execution may not always be achieved.** Therefore, **you do not have to accept our recommendation to use Schwab** as your custodian. However, if you direct us to use another custodian, **we may not be able to provide you complete institutional services and such service may cost you more in transaction fees.**

Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as “best execution”) for our clients. Therefore, we will not bunch (aggregate) orders for a block trade unless: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- v **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- v **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- v **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

If you would like additional information on our trading allocation policies, a copy is available for review upon request.

REVIEW OF ACCOUNTS

ITEM 13

Portfolio Management Reviews

Your investment strategies and investments are managed by Brian C. Ulch and reviewed on an on-going basis. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. However, it is **your responsibility to communicate these changes** for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from Schwab where your account(s) are held in custody that identifies your current investment holdings, the cost of each of those investments, and their current market values.

You are encouraged to review the trading activities disclosed on your account statements which summarizes your portfolio account value, current holdings, and all account transactions made during the quarter. **It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.**

Financial Planning Reviews

Mr. Ulch will work closely with you to be sure the action points identified in the financial plan have been or are being properly executed. Once the action points have been completed, the financial plan should be reviewed at least annually. Material changes in your lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes** to us so that the appropriate adjustments can be made.

CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

Referral Compensation

We may directly compensate persons for client referrals provided such persons are qualified and have entered a solicitation agreement with us as required by Rule 206(4)-3 of the

Investment Adviser Act of 1940, as amended. Under such arrangements, if a solicitor referred you, the solicitor will provide you complete information on our relationship - the relationship between the solicitor and us - and the compensation the solicitor will receive should you choose to open an account. This compensation will be paid solely from our fee and will not result in any additional charge to you.

The solicitor is not licensed to give you any investment advice and therefore cannot advise you on the management of your account. A solicitor simply makes an introduction and is compensated only if you were to open a management account with us under these arrangements.

Other Compensation (Indirect Benefit)

The Company receives an indirect economic benefit from Schwab (See “Custodial Services” above under Item 12, “**Brokerage Practices**” for more detailed information on what these services and products could be.)

Financial Planning Compensation

As previously mentioned, Brian C. Ulch is a licensed insurance agents (See Item 10, “**Other Financial Industry Activities & Affiliations**” for more information.). This can create a conflict of interest when recommending for a fee, through a financial plan, that you purchase an insurance product where he can also earn a commission.

There are also potential conflicts of interest when Mr. Ulch suggests need for outside consultations and professional services (i.e., attorneys, accountants, brokers, etc.) to implement certain aspects of an estate or financial plan. Even though he does not share in any fees earned by the outside professionals when implementing an estate or financial plan, it does create an incentive on his part to refer your business to only those entities that may in turn refer potential clients to us.

In both cases, there is potential for divided loyalty and the objectivity of the advice we render could be subjective and create a disadvantage to you. Therefore, to ensure you understand the choices and risks you have in receiving financial planning along with all other investment recommendations, the following disclosures are provided to assist you with your decisions:

- v Certain aspects of a financial plan require the assistance of a Registered Representative of a broker-dealer to execute the transaction. In this situation regardless of who performs the transaction(s), **such person will be entitled to earn a commission.**
- v If requested by you to implement any insurance recommendations made in the financial plan, Mr. Ulch will execute such transactions through those insurance companies in which he is a licensed insurance agent. In such cases, **he will receive the normal commissions associated with such insurance transactions.**
- v You are under no obligation to have any professional that we recommend prepare planning documents (i.e.; financial, estate, tax, etc...). **You are free to choose those outside professionals to implement the recommendations made in the financial plan.**
- v You are under **no obligation to accept** Mr. Ulch’s advice and purchase the insurance products he recommends. **You are free to reject his recommendation and make your own choice.**

Notwithstanding such potential conflicts of interest, we strive to serve your best interest and ensure such disclosure is being properly made to you in compliance with the Investment Advisers Act of 1940, Rule 275.206.

CUSTODY

ITEM 15

Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities, but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities shall be maintained with Schwab as indicated above in Item 12, “**Brokerage Practices.**”

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- v We report to the regulatory authority (the Florida Office of Financial Regulation) having jurisdiction over our advisory practice that we have custody.
- v Your funds and securities will be maintained with a qualified custodian (Schwab) in a separate account in your name.
- v Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.
- v At the time we notify Schwab to withdraw our monthly fee from your account, we will send you a monthly notice itemizing our fee. Itemization includes the formula used to calculate our fee, the amount of assets under management the fee is based on, and the time-period covered by the fee.

Schwab is required by law to send you, at least quarterly, statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from Schwab to verify the accuracy and correctness of our reporting.**

INVESTMENT DISCRETION

ITEM 16

We have you complete our Investment Advisory Agreement which sets forth our discretionary trading authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at anytime, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

VOTING CLIENT SECURITIES

ITEM 17

We do not vote client proxies. You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand or you want clarification, you may contact us and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

ITEM 19

Information of each of our principal executive officers and supervised persons can be found in the attached Form ADV Part 2B: Brochure Supplements.

END OF DISCLOSURE BROCHURE

FORM ADV: PART 2B

BROCHURE SUPPLEMENT



Aventail Wealth Management, LLC

353 Avenue C Southwest
Winter Haven, Florida 33880

CONTACT INFORMATION

Tel: 863.333.1927

www.aventailwm.com

SUPERVISION

Carol L. Shira

Chief Compliance Officer

Phone:

863.333.1927

e-Mail:

carolshira@aventailwm.com

Ms. Shira is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

Her other duties include, but are not limited to, meeting periodically with all employees

to impress upon them their fundamental principles of conduct following our Code of Ethics and and professionalism in

confirming they are acting in our clients' best interests in discharging their duties

BROCHURE SUPPLEMENT

DATED

27

March
2019

This Brochure Supplement provides information about Brian C. Ulch that is an accompaniment to the Disclosure Brochure for our firm, Aventail Wealth Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Ulch, you are welcome to contact us – our contact information is listed to the left.

Additional information about Aventail Wealth Management, LLC and Brian C. Ulch are also available on www.adviserinfo.sec.gov.

Brian C. Ulch, MBA, CES™

CRD#: 6596245

Year of Birth: 1975

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1998 - University of Central Florida: Bachelor of Science in Accounting

1998 - University of Central Florida: Masters in Business Administration, Emphasis in Finance

Licenses

FINRA Exams: Series 65 - Uniform Investment Adviser Law Examination (Active)

Insurance: 2-14 License - Florida Life & Annuity Insurance (Active)

Designations: **Certified Estate and Trust Specialist™ (CES™) Certification (CES™ since 2013)** - The CES™ designation, issued by the Institute of Business & Finance ("IBF"), provides increased knowledge in the area of estate planning and asset repositioning implementation. To earn the CES™ designation, one must complete a comprehensive 15-week program and successfully passed the examination process. To retain the CES™ designation certificate holders are required to pay an annual certification fee, complete 30-hours of continuing education every two (2) years, and adhere to the IBFs Code of Ethics and Standards of Practice.

Business Background

12/2015 - Present Aventail Wealth Management, LLC

Position: Managing Member & Portfolio Manager

10/2008 - 11/2015 Citizens Bank & Trust

Position: Vice President & Senior Portfolio Manager

11/1999 - 10/2008 SunTrust Bank

Position: Vice President & Portfolio Manager

11/1998 - 11/1999 SunTrust Bank

Position: Bank Officer & Commercial Citrus Analyst

DISCIPLINARY INFORMATION

Mr. Ulch has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Licensed Insurance Agent Activities

Mr. Ulch is a commissioned insurance agent to sell insurance products by the State of Florida and as a non-resident agent in California and Illinois. This can create a conflict of interest when recommending for a fee, through a financial plan, that you purchase insurance that he can also earn a commission. In addition, there are also potential conflicts of interest when Mr. Ulch suggests the need for outside consultations and professional services (i.e., attorneys or accountants, brokers, etc.) to implement certain aspects of an estate or financial plan. Even though he does not share in any fees earned by the outside professionals, it does create an incentive for him to refer your business to only those entities that in turn refer potential clients to Aventail Wealth Management, LLC.

In both cases, there is potential for divided loyalty and the objectivity of the advice rendered could be subjective and create a disadvantage to you. Therefore, to ensure you understand the choices and risks you have in receiving financial planning along with all other investment recommendations, the following disclosures are provided to assist you with your decisions:

- You are under no obligation to have any professional that Mr. Ulch recommends prepare planning documents (i.e., estate, tax, etc...). **You are free to choose those outside**
- You are under **no obligation to accept** Mr. Ulch's advice and purchase insurance **professionals to implement the recommendations made in the financial or estate plan.**

products
he recommends. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, **he/she will earn the normal commission from the sale.**



Aventail Wealth Management, LLC

353 Avenue C Southwest
Winter Haven, Florida 33880

CONTACT INFORMATION

Tel: 863.333.1927

www.aventailwm.com

Continuation of Information for:

Brian C. Ulch, MBA, CES™

CRD#: 6596245

Year of Birth: 1975

Continuation of Licensed Insurance Agent Activities

- Since Mr. Ulch only offers financial products from those insurance companies in which he is appointed, such recommendations are limited to that pool of product. Therefore, it is possible that you might be able to independently get a quote from another insurance carrier for a similar insurance product that offers equivalent or better insurance coverage with a lower deductible.

For more information about other potential conflicts of interest, see our Disclosure Brochure, Item 10, “**Other Financial Industry Activities & Affiliations**” and Item 14, “**Client Referrals & Other Compensation**” under and “Financial Planning Compensation”. Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

ADDITIONAL COMPENSATION

Annually, insurance companies have sales contests as a way to promote and incentivize the sale of their products. Mr. Ulch, as an insurance agent, can earn awards, prizes, and/or bonuses for these sales. As a matter of policy, **our focus is on your financial goals not sales contests**. However, it is possible that Mr. Ulch could receive an award or additional compensation for his insurance sales depending upon criteria set by specific insurance companies.

We make every effort to disclose the options you have in accepting our advice and any conflicts of interest you may encounter (See “Other Business Activities” above and see in the Disclosure Brochure Item 10, “**Other Financial Industry Activities & Affiliations**” and Item 14, “**Client Referrals & Other Compensation**” under and “Financial Planning Compensation” for more information on these disclosures.). You are welcome at any time to ask Mr. Ulch if he is receiving any incentives for recommending you purchase an insurance product from a specific insurance company and he has the obligation to disclose that information to you.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Ulch has not been found liable in an arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or been the subject of a bankruptcy petition at any time during the past ten years.