

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**



**Evolution**  
Wealth Management

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This brochure provides information about the qualifications and business practices of Evolution Wealth Management Inc. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 239-771-8696. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Evolution Wealth Management Inc. (CRD #307644) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**MARCH 1, 2024**

## **Item 2: Material Changes**

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### Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### Material Changes since the Last Update

We have one new material change to report since the filing of our last update. Our ownership has changed. The firm is currently owned by the following two individuals: Adam J. Bruno - 50% ownership, Kurt M. Traulsen - 50% ownership.

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### Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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## **Item 4: Advisory Business**

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### **Firm Description**

Evolution Wealth Management Inc. (“Evolution”) was founded in 2020. The firm is currently owned by the following two individuals: Adam J. Bruno – 50% ownership, Kurt M. Traulsen - 50% ownership.

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### **Types of Advisory Services**

#### **ASSET MANAGEMENT**

Evolution offers discretionary asset management services to advisory Clients. Evolution will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Evolution discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. When deemed appropriate for the Client, Evolution may hire Sub-Advisors to manage all or a portion of the assets in the Client account. Evolution has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Evolution. Sub-Advisors execute trades on behalf of Evolution in Client accounts. Evolution will be responsible for the overall direct relationship with the Client. Evolution retains the authority to terminate the Sub-Advisor relationship at Evolution’s discretion.

#### **THIRD PARTY MANAGERS**

When deemed appropriate for the Client, Evolution may recommend that Clients utilize the services of a Third Party Manager (TPM) to manage a portion of, or your entire portfolio. All TPMs that we recommend must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority(ies).

After gathering information about your financial situation and objectives, an investment advisor representative of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM(s), we will monitor the performance of the TPM(s) to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, Evolution receives solicitor fees from the TPM. We act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We help the Client complete the necessary paperwork of the TPM, and provide ongoing services to the Client. Ongoing services include but are not limited to:

1. Meet with the Client to discuss any changes in status, objectives, time horizon or suitability;
2. Update the TPM with any changes in Client status which is provided to Evolution by the Client;
3. Review the statements provided by the TPM; and
4. Deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM to the Client.

Evolution will provide the TPM with any changes in Client status as provided to us by the Client and review the quarterly statements provided by the TPM. Evolution will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM. Clients placed with TPM will be billed in accordance with the TPM's Fee Schedule which will be disclosed to the Client prior to signing an agreement. This is detailed in Item 10 of this brochure.

#### FINANCIAL PLANNING AND CONSULTING SERVICES

We offer financial planning and consulting services to evaluate a client's financial situation, goals and risk tolerance. Through a series of personal interviews and / or the use of questionnaires we collect pertinent data, identify goals, objectives, financial problems, and potential solutions. With this information, we tailor the client's written financial plan or consulting advice to the client's situation. Our advice may cover any of the following topics: net worth statement; cash flow analysis, tax analysis, insurance analysis; estate planning techniques; retirement projection; 401k review; or other needs as identified during our meetings with the client. Our advice may be verbal or in a written financial plan. The type of service is stated in the financial planning agreement.

#### SEMINARS AND WORKSHOPS

Evolution holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

As part of Evolution's comprehensive approach to assisting our clients to achieve their financial goals and objectives, upon your request, we will attempt to coordinate our services with your trusted third-party legal, tax, and insurance advisors. Where you have not previously engaged a trusted third-party professional for any of these roles (e.g., attorney, certified public accountant, insurance agent, etc.), we may recommend a provider to you, but only where we believe such recommendations to be in your best interests. We do not receive referral fees or other direct compensation of any kind in connection with these recommendations. You are never obligated to engage any third-party professionals we recommend and do so at your sole discretion and risk. We are not responsible for the acts and omissions of any recommended third parties professionals you elect to engage.

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#### Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

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#### Wrap Fee Programs

Evolution does not sponsor any wrap fee programs.

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#### Client Assets under Management

As of February 23, 2024 we managed \$79,696,194 in discretionary assets and \$0 in non-discretionary assets.

## Item 5: Fees and Compensation

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### Method of Compensation and Fee Schedule

#### ASSET MANAGEMENT

Evolution offers discretionary asset management services to advisory Clients. Evolution charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Max Annual Fee
All Assets	2.00%

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After 5 business days, the Client may cancel by providing written notice to Evolution and Evolution may terminate advisory services with thirty (30) days written notice to the Client. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Evolution. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Evolution may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Evolution will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisors fees are inclusive of the fees charged by Evolution. As part of our portfolio management services, we have contracted with Bison Advisors ("Bison"), an independent registered investment advisor, to provide us with assistance with some or all of the following administrative tasks: trade processing, collection of advisory fees, invoicing, reporting, recordkeeping, and/or other similar forms of assistance. In exchange for these services, we pay Bison a fee that is calculated as a percentage of the aggregate market value of the client accounts they service on our behalf. These fees are absorbed within the advisory fees you pay to Evolution. You do not incur any additional fees when we elect to utilize Bison's services in administering your account. We do not receive any referral compensation in exchange for utilizing Bison's services.

#### FINANCIAL PLANNING AND CONSULTING SERVICES

Our financial planning and consulting services are provided on a fixed or hourly fee basis in accordance with the following fee schedule:

**Fixed Fee:** The fixed fee ranges up to \$20,000. The fixed fee varies and depends upon the nature and complexity of each client's individual circumstances and the number of topics covered by the service.



Hourly Fee: The hourly rate is not to exceed \$500 an hour with a minimum of two hours per engagement. The hourly rate will vary depending on the nature and complexity of each client's individual circumstances and the number of topics covered by the service. The financial planning fee may be negotiated or waived at our discretion. At the time of engagement, we provide the client with a written estimate of the total fee. Fees for financial planning services are invoiced directly to the client either monthly or quarterly, and are typically payable to us within thirty (30) days of invoicing, unless otherwise agreed in writing. In other instances, clients may be required to pay up to 100% of the agreed upon fixed fees at the inception of the relationship, with any balance paid at the conclusion of the engagement.

The client may terminate the financial planning and consulting services for any reason within the first five (5) business days after signing a financial planning agreement and receive a 100% refund of any fees paid, without any cost or penalty. After the first five (5) business days, the financial planning agreement may be terminated at any time by either party through written notice to the other party. Upon our receipt of a written termination notice, hourly financial planning clients will receive a prorated refund of any unearned fees based on the number of hours completed on the plan or consulting services. Flat fee financial planning clients will receive a prorated refund of any unearned fees based on the percentage of work completed on the plan.

#### SEMINARS AND WORKSHOPS

Evolution holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. Evolution does not charge a fee for attendance to these seminars.

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#### Client Payment of Fees

Investment management fees are billed quarterly in advance, meaning that we invoice you before the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Clients pay the TPMs' investment advisory fees. Prior to signing an investment advisory agreement, the method of payment will be disclosed in the TPM's Form ADV Part 2.

Evolution, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

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#### Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees. For more details on the brokerage practices, see Item 12 of this brochure.

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#### Prepayment of Client Fees

Evolution does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Evolution.

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#### External Compensation

Certain investment advisor representatives of Evolution are also licensed to sell insurance in one or more states and may be affiliated with a licensed general insurance agency (including our affiliate, Evolution Retirement Services, Inc.) or act as a direct agent representative of a specific insurance company or companies. Insurance related business is transacted with advisory clients and licensed individuals may receive commissions from insurance products sold to clients. Clients are advised that the fees paid to us for investment advisory services are separate and distinct from the commissions earned by any individual or insurance agency (including Evolution Retirement Services, Inc) for selling insurance products to clients. If requested by a client, we will disclose the amount of commission expected to be received by our related persons.

The receipt of insurance related commissions by our related persons presents a conflict of interest, insofar as there is a financial incentive for our recommendation of certain insurance products to clients. As fiduciaries, we must act primarily for the benefit of our investment advisory clients. As such, we will only transact insurance-related business with clients and recommend insurance products to clients when the conflicts related to such recommendations are fully disclosed and where our insurance-related recommendations are in the client's best interests. Further, we must determine in good faith that any commissions paid to our related persons are appropriate. Clients are informed that they are under no obligation to use any individual associated with our firm for insurance products or services. Clients may use any insurance firm, agency, or agent they choose.

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#### Educational Approach to Rollovers

As a firm policy, Evolution does not provide recommendations to clients with respect to the rollover of assets between employer sponsored retirements accounts (e.g., 401(k), 457 plans, and 403(b) accounts) and individual retirement accounts (e.g., Roth IRAs, Traditional IRAs, SIMPLE IRAs, and SEP IRAs). Instead, the firm takes an educational approach in accordance with the U.S. Department of Labor's Interpretive Bulletin 96-1. Under this approach, our role will be strictly limited to providing you with general educational materials regarding the nature and potential consequences of rollover transactions. We will make no recommendation to you regarding the prospective rollover of your assets and we advise clients to speak with their trusted tax and legal advisors with respect to all rollover decisions. To assist your independent decision-making process, we may provide you with materials discussing some or all of the following topics: the general pros and cons of rollover transactions; the benefits of retirement plan participation; the impact of pre-retirement withdrawals on retirement income; the investment options available inside your retirement plan account; and high level discussion of general investment concepts (e.g., risk versus return, the benefits of diversification and asset allocation, historical returns of certain asset classes, etc.). We may also provide you with questionnaires and/or interactive investment materials that may provide a means for you to independently determine your future retirement income needs and to assess the impact of different asset allocations on your retirement income. You will make the final rollover decision.

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

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### Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Evolution does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Evolution to recommend an investment that may carry a higher degree of risk to the Client.

## **Item 7: Types of Clients**

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### Description

Evolution generally provides investment advice to individuals, high net worth individuals, trusts, estates, or charitable organizations, corporations or business entities. Client relationships vary in scope and length of service.

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### Account Minimums

Evolution does not require a minimum to open an account.

Account minimums are determined by the TPMs Evolution refers its' Clients to.

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

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### Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

TPMs utilized by Evolution may use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the TPM's Form ADV Part 2. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

The main sources of information used by TPMs may include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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#### Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

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#### Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Evolution:

- *Market Risk:* The prices of securities in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices). Adviser has no control over the risks taken by the underlying funds in which Client invests.
- *REIT Risk:* To the extent that a Client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.

The risks associated with utilizing TPMs include:

- Manager Risk
  - TPM fails to execute the stated investment strategy
- Business Risk

- TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
  - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
  - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

## **Item 9: Disciplinary Information**

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### Criminal or Civil Actions

Evolution and its management have not been involved in any criminal or civil action.

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### Administrative Enforcement Proceedings

Evolution and its management have been involved in administrative enforcement proceedings. On April 19<sup>th</sup>, 2011, Mr. Bruno was named in an Administrative Complaint (Case No. 090-2714) by the Florida Commissioner of Education which resulted in a Consent Order (Final Order Case No. 1102225) revoking Mr. Bruno's educators' certificate for ten (10) years. Due to this Consent Order, and Mr. Bruno failing to disclose the event while completing renewal paperwork, his Insurance Licenses were subsequently revoked in the State of South Dakota on April 27<sup>th</sup>, 2012 (Case No. 100043), revoked in the State of California on September 12<sup>th</sup>, 2012 (File No. LBB 737-AP (AR)), and had his license renewal denied in the State of Florida on October 2<sup>nd</sup>, 2015 (Article # 7009-0080-0001-0140-1870)

More information on these events can be found on Mr. Bruno's Form U4 available on BrokerCheck and the IAPD websites.

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### Self-Regulatory Organization Enforcement Proceedings

Evolution and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Evolution or the integrity of its management.

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

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### Broker-Dealer or Representative Registration

No affiliated representatives of Evolution are registered representatives of a broker-dealer.

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### Futures or Commodity Registration

Neither Evolution nor its affiliated persons are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Investment Advisor Representatives of Evolution may receive external compensation in their capacity as licensed insurance agents. From time to time, they will offer clients

services from those activities including but not limited to fixed insurance products. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and Evolution's fiduciary obligation to place the best interest of the Client first, and, Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing

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#### Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Clients placed with TPMs will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement. When referring Clients to a TPM, the Client's best interest will be the main determining factor of Evolution. Evolution ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

These practices represent conflicts of interest because Evolution is paid a Solicitor Fee for recommending the TPMs and may choose to recommend a particular TPM based on the fee Evolution is to receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of his Clients. Clients are not required to accept any recommendation of TPMs given by Evolution and have the option to receive investment advice through other money managers of their choosing.

Evolution may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Evolution. Sub-Advisors execute all trades on behalf of Evolution in Client accounts. Evolution will be responsible for the overall direct relationship with the Client. Evolution retains the authority to terminate the Sub-Advisor relationship at Evolution's discretion.

In addition to the authority granted to Evolution under the Agreement, Client will grant Evolution full discretionary authority and authorizes Evolution to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to Evolution in the Agreement. In addition, at Evolution's discretion, Evolution may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as Evolution may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that Evolution has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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#### Referrals to Attorney and/or Tax Professionals (Third-Party Professionals)

As disclosed in Item 4 of this brochure, we may recommend that you engage the services of certain third-party professionals, including attorneys and/or CPA's for tax planning, trust and estate planning, asset protection, and other legal services. Where agreed to in writing with the client, the fees paid for Evolution's advisory services may also include the costs of certain tax planning fees, estate planning fees and other legal expenses charged by a recommended third-party professional. In these circumstances, Evolution and/or its financial professionals will pay the costs of certain professional services on the client's behalf. While we do not receive any referral fees or other monetary compensation of any

kind from the third-party professionals to which we refer our clients, we may from time to time receive referrals of prospective advisory clients as a result of these arrangements. This creates a conflict of interest, insofar as it creates an incentive for us to continue to recommend certain third-party professionals to our clients. Clients are never obligated to engage any third-party professionals recommended by our firm and may engage any third-party professional of their desire. We will only recommend a third-party professional to you when we believe such recommendation to be in your best interests.

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

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### Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of Evolution have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Evolution affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Evolution. The Code reflects Evolution and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Evolution’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Evolution may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Evolution’s Code is based on the guiding principle that the interests of the Client are our top priority. Evolution’s officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Evolution will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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Investment Recommendations Involving a Material Financial Interest and Conflict of Interest  
Evolution and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.



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Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest Evolution and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Evolution with copies of their brokerage statements.

The Chief Compliance Officer of Evolution is Adam Bruno. He reviews all affiliated persons trades each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over affiliated persons' transactions.

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#### Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Evolution does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Evolution with copies of their brokerage statements.

The Chief Compliance Officer of Evolution is Adam Bruno. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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### **Item 12: Brokerage Practices**

#### Factors Used to Select Broker-Dealers for Client Transactions

Evolution requires the use of a particular broker-dealer. Evolution will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Evolution relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Evolution.

- *Directed Brokerage*  
Evolution does not allow directed brokerage accounts.
- *Brokerage for Client Referrals*  
Evolution does not make commitments to any broker-dealer to compensate that broker-dealer through brokerage transactions for client referrals. Evolution does not compensate for Client referrals.
- *Best Execution*  
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an

ongoing relationship with such broker and the financial strength and stability of the broker. Evolution does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*  
Evolution does not receive soft dollar benefits.

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#### Aggregating Securities Transactions for Client Accounts

Evolution manages each account separately, and therefore, does not aggregate purchases and sales and other transactions.

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

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#### Schedule for Periodic Review of Client Accounts and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of Evolution. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts may include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target bans of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Accounts managed by TPMs are reviewed on a quarterly basis by Investment Advisor Representatives of Evolution. Account reviews are performed more frequently when market conditions dictate.

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#### Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

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#### Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Evolution's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

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### **Item 14: Client Referrals and Other Compensation**

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#### Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Evolution receives a portion of the annual management fees collected by the TPM(s) to whom Evolution refers Clients.

This situation creates a conflict of interest because Evolution and/or its Investment Advisor Representative have an incentive to decide what TPMs to use because of the higher solicitor fees to be received by Evolution. However, when referring Clients to a TPM, the Client's best interest will be the main determining factor of Evolution.

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#### Advisory Firm Payments for Client Referrals

Evolution does not compensate for Client referrals.

## **Item 15: Custody**

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### Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Evolution.

If Evolution is authorized or permitted to deduct fees directly from the account by the custodian:

- Evolution will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- Evolution will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

## **Item 16: Investment Discretion**

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### Discretionary Authority for Trading

Evolution requires discretionary authority to manage securities accounts on behalf of Clients. Evolution has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Evolution discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Evolution allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Evolution in writing.

Evolution does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## **Item 17: Voting Client Securities**

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### Proxy Votes

Evolution does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Evolution will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Item 18: Financial Information**

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### Balance Sheet

A balance sheet is not required to be provided because Evolution does not serve as a custodian for Client funds or securities and Evolution does not require prepayment of fees of more than \$500 per Client six months or more in advance.

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### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Evolution has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

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### Bankruptcy Petitions during the Past Ten Years

Evolution has not had any bankruptcy petitions in the last ten years.

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## **Item 19: Requirements for State Registered Advisors**

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### Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

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### Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

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### Performance Based Fee Description

Neither Evolution nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

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### Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

None to report.

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### Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

1. Neither Evolution nor its management have been involved 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;
  - e) Dishonest, unfair or unethical practices.
2. Evolution's management has been found liable in a civil, self-regulatory organization, or administrative proceeding involving one 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;
  - e) Dishonest, unfair or unethical practices.

Evolution and its management have been involved in administrative enforcement proceedings. On April 19<sup>th</sup>, 2011, Mr. Bruno was named in an Administrative Complaint

(Case No. 090-2714) by the Florida Commissioner of Education which resulted in a Consent Order (Final Order Case No. 1102225) revoking Mr. Bruno's educators' certificate for ten (10) years. Due to this Consent Order, and Mr. Bruno failing to disclose the event while completing renewal paperwork, his Insurance Licenses were subsequently revoked in the State of South Dakota on April 27<sup>th</sup>, 2012 (Case No. 100043), revoked in the State of California on September 12<sup>th</sup>, 2012 (File No. LBB 737-AP (AR)), and had his license renewal denied in the State of Florida on October 2<sup>nd</sup>, 2015 (Article # 7009-0080-0001-0140-1870).

More information on these events can be found on Mr. Bruno's Form U4 available on BrokerCheck and the IAPD websites.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B



**Evolution**  
Wealth Management

**Evolution Wealth Management Inc.**

Adam Bruno

**Office Address:**  
12487 Brantley Commons Ct.  
Fort Myers, FL 33907

**Tel:** 239-771-8696

[adam@evoretire.com](mailto:adam@evoretire.com)

This brochure supplement provides information about Adam Bruno and supplements the Evolution Wealth Management Inc. brochure. You should have received a copy of that brochure. Please contact Adam Bruno if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Adam Bruno (CRD #7236076) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 1, 2024**

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

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Principal Executive Officer – Adam Bruno

- Year of birth: 1981
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#### Item 2 - Educational Background and Business Experience

Educational Background:

- Niagara University; BFA Theatre Studies and English; 2004
- Niagara University; MS Secondary Education; 2006

Business Experience:

- Evolution Wealth Management Inc.; Owner/Investment Advisor Representative; 02/2020 – Present
  - Evolution Retirement Services Inc.; Owner/Insurance Agent; 01/2018 – Present
  - Grace Advisory Group; Advisor; 08/2015 – 01/2018
  - First Family Insurance; Insurance Agent; 05/2015 – 08/2015
  - TZ Insurance Solutions; Insurance Agent; 06/2011 – 05/2015
  - American Income Life Insurance; Insurance Agent; 02/2011 – 06/2011
  - The Big M Casino; Dealer; 06/2009 – 02/2011
- 

#### Item 3 - Disciplinary Information

A. Mr. Bruno has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

- 1) Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
- 2) Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- 3) Was found to have been involved in a violation of an investment-related statute or regulation; or
- 4) Was the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. Bruno has been subject to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

- (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Bruno has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Bruno has been involved in a hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Evolution and its management have been involved in administrative enforcement proceedings. On April 19<sup>th</sup>, 2011, Mr. Bruno was named in an Administrative Complaint (Case No. 090-2714) by the Florida Commissioner of Education which resulted in a Consent Order (Final Order Case No. 1102225) revoking Mr. Bruno's educators' certificate for ten (10) years. Due to this Consent Order, and Mr. Bruno failing to disclose the event while completing renewal paperwork, his Insurance Licenses were subsequently revoked in the State of South Dakota on April 27<sup>th</sup>, 2012 (Case No. 100043), revoked in the State of California on September 12<sup>th</sup>, 2012 (File No. LBB 737-AP (AR)), and had his license renewal denied in the State of Florida on October 2<sup>nd</sup>, 2015 (Article # 7009-0080-0001-0140-1870).

More information on these events can be found on Mr. Bruno's Form U4 available on BrokerCheck and the IAPD websites.

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#### Item 4 - Other Business Activities

Adam Bruno owns 50% of Evolution Wealth Management Inc., a state of Florida Registered Investment Advisory firm. Approximately 80 hours per month are spent on this activity, all during trading hours.

Adam Bruno is also owner of, and a licensed insurance agent with Evolution Retirement Services Inc. Approximately 80 hours per month are spent on this activity, all during trading hours. Adam will offer Clients insurance services from this activity. This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first, and, Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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#### Item 5 - Additional Compensation

Adam Bruno receives commissions on the insurance he sells. He does not receive any performance-based fees.



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## Item 6 - Supervision

Adam Bruno is the Chief Compliance Officer of Evolution. He is solely responsible for all supervision and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at adam@evoretire.com or 239-771-8696.

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## Item 7 - Requirements for State-Registered Advisors

A. Mr. Bruno has been involved in one of the following:

1. 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;
  - e) Dishonest, unfair or unethical practices.
2. Been 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;
  - e) Dishonest, unfair or unethical practices.

B. Mr. Bruno has never been the subject of a bankruptcy petition.

Evolution and its management have been involved in administrative enforcement proceedings. On April 19<sup>th</sup>, 2011, Mr. Bruno was named in an Administrative Complaint (Case No. 090-2714) by the Florida Commissioner of Education which resulted in a Consent Order (Final Order Case No. 1102225) revoking Mr. Bruno's educators' certificate for ten (10) years. Due to this Consent Order, and Mr. Bruno failing to disclose the event while completing renewal paperwork, his Insurance Licenses were subsequently revoked in the State of South Dakota on April 27<sup>th</sup>, 2012 (Case No. 100043), revoked in the State of California on September 12<sup>th</sup>, 2012 (File No. LBB 737-AP (AR)), and had his license renewal denied in the State of Florida on October 2<sup>nd</sup>, 2015 (Article # 7009-0080-0001-0140-1870).

More information on these events can be found on Mr. Bruno's Form U4 available on BrokerCheck and the IAPD websites.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B



**Evolution**  
Wealth Management

**Evolution Wealth Management Inc.**

**Kurt M. Traulsen**

**Office Address:**  
12487 Brantley Commons Ct.  
Fort Myers, FL 33907

**Tel:** 239-771-8696

[kurt@evoretire.com](mailto:kurt@evoretire.com)

This brochure supplement provides information about Kurt M. Traulsen and supplements the Evolution Wealth Management Inc. brochure. You should have received a copy of that brochure. Please contact Adam Bruno if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Kurt M. Traulsen (CRD #6508645) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MARCH 1, 2024**

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

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Principal Executive Officer – Kurt M. Traulsen

- Year of birth: 1992
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#### Item 2 - Educational Background and Business Experience

Educational Background:

- Florida Gulf Coast University, Bachelor of Finance: 2014

Business Experience:

- Evolution Wealth Management Inc.; Owner & Investment Advisor Representative; 11/2020 – Present;
  - Evolution Retirement Services, Insurance Agent, 08/2018 to Present;
  - TRUADVICE, Investment Advisor Representative, 10/2019 to 2/2021;
  - Brokers Financial, Investment Advisor Representative, 9/2018 to 9/2019;
  - Grace Capital Management Group, Investment Adviser Representative, 06/2015 to 07/2018;
  - Grace Advisory Group, Senior Case Manager, 02/2016 to 07/2018;
  - Grace Capital Management Group, Client Service Associate, 12/2014 to 06/2015;
  - Dillard's, Sales Associate/Intern, 08/2014 to 03/2015;
  - Florida Gulf Coast University, Full Time Student, 08/2010 to 12/2014.
- 

#### Item 3 - Disciplinary Information

A. Mr. Traulsen has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. Traulsen has never been subject to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;

2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
  - (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Traulsen has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Traulsen has never been involved in a hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

More information about Mr. Traulsen can be found on BrokerCheck and the IAPD websites.

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#### Item 4 - Other Business Activities

Kurt Traulsen owns Holistic Planning Solutions, LLC which is an LLC established to receive insurance commissions. Kurt is independently licensed to sell insurance and annuity products through various insurance companies. He spends roughly 80 hours per month of his time on this activity, all during trading hours. This activity pays Kurt M. Traulsen a commission that is separate from the advisory fees outlined in the firm's ADV Part 2A. The additional compensation creates a financial incentive to recommend and sell the services to the firm's clients. Kurt M. Traulsen mitigates any conflicts of interest by acting in the client's best interest through his fiduciary duty and through the implementation of policies and procedures that address the conflict. Clients are never obligated or required to purchase insurance products from or through Kurt M. Traulsen and may choose any independent insurance agent and insurance company to purchase insurance products.

Kurt Traulsen also owns CGK Capital LLC which is a LLC set up to collect rental income from rental properties he owns. 20 hours per month are spent on this activity, 0 are spent during trading hours.

Kurt Traulsen also owns 50% of Evolution Wealth Management Inc, a state of Florida Registered Investment Advisory firm. On average, 80 hours per month are spent on this activity, all during trading hours.

Kurt Traulsen also owns CGK Assets LLC which is a Rental Property Holding / Property management Company. 2 hours per month are spent on this activity, 0 are spent during trading hours.

Kurt Traulsen is also part owner of Evolution Retirement Services which is a corporation set up as an insurance agency. He spends roughly 80 hours per month of his time on this activity.

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Item 5 - Additional Compensation

Kurt M. Traulsen receives commissions on the insurance he sells. He does not receive any performance-based fees.

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Item 6 - Supervision

Kurt Traulsen is supervised by Adam Bruno, the firm's Chief Compliance Officer. Mr. Traulsen is also bound by the firm's Code of Ethics and its policies and procedures. The firm's Chief Compliance Officer is primarily responsible for the implementation of the firm's policies and procedures and overseeing the activities of the firm's supervised persons. Should you have any questions regarding the firm's supervision or compliance practices, Adam Bruno can be reached at adam@evoretire.com or 239-771-8696.

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Item 7 - Requirements for State-Registered Advisors

Kurt Traulsen has not had any legal or disciplinary events nor has he ever been the subject of a bankruptcy petition.

More information about Mr. Traulsen can be found on BrokerCheck and the IAPD websites.