

## Item 1: Cover Page

### Form ADV Part 2A Brochure

# OMNI 360 Wealth, Inc.

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[www.Omni360Advisors.com](http://www.Omni360Advisors.com)

**Facebook:** <https://www.facebook.com/Omni360Advisors>

**Instagram:** <https://www.instagram.com/omni360advisors/?hl=en>

**YouTube:** <https://www.youtube.com/@Omni360Advisors>

*February 26, 2026*

This brochure provides information about the qualifications and business practices of OMNI 360 Wealth, Inc. If you have any questions about the contents of this brochure, please contact [VZaffuto@omnillc.com](mailto:VZaffuto@omnillc.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about OMNI 360 Wealth, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

The material changes in this brochure from the last annual updating amendment of OMNI 360 Wealth, Inc. on 03/12/2025 are described below. Material changes relate to OMNI 360 Wealth, Inc.'s policies, practices or conflicts of interests.

- Valerie Zaffuto is now serving as Chief Compliance Officer of OMNI 360 Wealth, Inc.

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## **OMNI 360 Wealth, Inc. (SEC No. 124878)**

### **Item 4 Advisory Business**

OMNI 360 Wealth, Inc. (OMNI) was founded in 1996 under the original name of Sound Financial Solutions by Linda J. Farinola (aka Linda J. Grant). There are four investment advisors (Linda J. Farinola, James G. Colitsas, Neel Shah and Bryan P. Katz), one associate advisor (Ronald McIntire) and two administrative employees. The firm is located in New Jersey and registered with the SEC as a registered investment advisor.

Linda J. Farinola, Bryan P. Katz and Neel Shah perform most of the investment advisory services for OMNI 360 Wealth, Inc. James Colitsas does have some communication with clients that were previously under his advisement. Ronald McIntire assists lead advisors with research, data input, analysis and delivery, and also has some communication with clients.

OMNI 360 Wealth, Inc. provides financial planning and investment management services to individuals, families, small businesses and related entities. OMNI works with clients to define financial objectives and develop strategies for reaching those objectives. The areas of focus include identification and prioritization of financial goals and potential problems, cash flow management and budgeting, education funding plans, retirement planning, estate planning, charitable goals, employee benefits, insurance needs, tax planning, investment and portfolio analysis and other financial issues specific to the client.

OMNI 360 Wealth, Inc. does provide investment advisory services on a discretionary basis as a stand-alone service. As part of that service, we do collect and analyze significant information about the client and set up investment guidelines and policies that are specific to that client and account.

The firm's compensation is solely from the fees paid directly by the clients. The firm does not receive commissions based on the client's purchase of any securities. No referral fees are paid or accepted. No financial benefits are received from custodians or broker dealers based on the client security transactions ("soft dollar benefits").

Assets under direct management of OMNI are held by independent custodians, Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) and Fidelity Investments, a division of National Financial Services, LLC (CRD# 13041) in the client's name. OMNI does not hold client funds. OMNI is considered to have custody in some jurisdictions due to the fact that a) we do charge our fees directly to client accounts and b) we do move money between client accounts with proper authorization. This would include accounts from an individual to or from an account that is held by the client jointly with another. The SEC determined that these transfers constitute custody and has issued a no action letter that outlines conditions on how those transactions are handled. OMNI complies with those conditions which are outlined in the custody section of this report.

OMNI also offers investment advisory services to business retirement accounts as a Registered Investment Advisor. OMNI does not have discretionary authority on those plans which are held at various custodians.

We may recommend other professionals, (e.g., lawyers, accountants, insurance agents etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis.

Conflicts of interest are disclosed to the client, and the relationships are managed in the best interest of the client.

Linda J. Farinola is the president of OMNI 360 Wealth, Inc. and spends approximately 75% of her time as manager, and investment advisor for the firm. Linda also performs some management duties (10%) for OMNI 360 Advisors, LLC. the indirect owner of OMNI - Planning & Management. Linda also performs tax planning and preparation services (10%) for OMNI 360 Tax, Consulting and Accounting which is also owned by OMNI 360 Advisors, LLC.

## Principal Owners

OMNI 360 Wealth, Inc. is now owned by OMNI 360 Advisors, LLC, . The ownership of OMNI 360 Advisors, LLC is as follows:

- 32.30% James Colitsas, CPA
- 32.30% Neel Shah
- 12.07% Estate of Thomas Colitsas, EA, Public Accountant
- 17.71% Linda J. Farinola, CFA, CFP(r), EA
- 5.63% Joyce Morrison

## Types of Advisory Services

**Financial Planning** services are offered on a comprehensive, piecemeal, or hourly basis. A written evaluation of the client's current situation and their goals is provided to the client. OMNI works with the client to define financial objectives and develop strategies for reaching those objectives. The areas of focus include identification and prioritization of goals, employee benefits, insurance needs, tax planning, investment and portfolio analysis and other issues specific to the client. The financial planning engagement also includes assistance with implementation of the recommendations accepted by the client. Telephone support and meetings occur as required typically for a one-year period.

**Investment Management** is provided to clients mostly on a discretionary basis. OMNI works with clients to produce investment guidelines that reflect the clients' needs, goals, temperament, and financial situation. Assets are then managed on an ongoing basis within the framework of the established guidelines. The guidelines outline the intended use for the funds, tax issues, asset allocation targets and ranges, benchmarks, permitted or prohibited assets or other client specific issues.

## Use of Third-Party Service Provider

OMNI 360 Wealth, Inc. (Omni) has retained Focus Partners Advisor Solutions (FPAS) to act as a sub-advisor for certain client accounts. FPAS shall provide various model asset allocation portfolios (each a "Portfolio", collectively "Portfolios") for selection by Omni. Each Portfolio strives to achieve long-term risk and return objectives through diversification among multiple asset classes using investment options available to FPAS, which may include, but not limited to, mutual funds and/ or exchange traded funds from Dimensional Fund Advisors LP, Bridgeway Capital Management, Inc., The Vanguard Group, Inc., Stoneridge Asset Management, LLC or other providers selected by FPAS. Each Portfolio is designed to meet a particular investment goal which Omni has determined is suitable based on the client's circumstances. Once the appropriate Portfolio(s) has been determined, the Portfolio will continuously be managed based on the portfolio's goal and FPAS will have the discretionary authority to manage the

Portfolio(s), including periodically rebalancing. However, Adviser, on behalf of its client, will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Should material life events occur, clients should immediately contact Omni to determine if changes to an account and the allocation of the assets held in the account are necessary.

In some cases, OMNI 360 Wealth selects AQR Capital Management, LLC (AQR) or Parametric Portfolio Associates ("Parametric"), LLC for sub- advisory management within client accounts. Parametric Portfolio Associates, LLC is an unaffiliated third-party sub-advisor owned by Eaton Vance Acquisitions, LLC, a wholly owned indirect subsidiary of Morgan Stanley. AQR and Parametric shall manage the assets in accordance with the investment strategy and any customization selected by Omni for each client account. AQR and Parametric collaborate with advisers to design and implement customized solutions through the application of equity, fixed income and derivative programs. Clients may impose restrictions on investments in securities or types of securities and set additional investment guidelines as they deem necessary through Omni. Clients where AQR or Parametric are implemented will receive disclosures related to AQR or Parametric and their separate and distinct fees.

**Portfolio Analysis** is provided to some clients who choose to make their own investment decisions and initiate their own transactions. OMNI provides an analysis and recommendations for the client that are consistent with their objectives. We work to identify strengths, weaknesses and potential risks of a portfolio and find alternatives that would reduce the costs or risk, while potentially maintaining or improving the gain of the portfolio.

**Concierge Services and Special Projects** may occasionally be undertaken that are not described in the other types of agreements.

**Treasury Management Services** are also provided to businesses. These services can include cash and investment management, banking service reviews, internal processes and controls, accounting and funding preparation and strategy.

**Educational Workshops** are occasionally offered free of charge to existing clients and individuals on our mailing list.

### [Types of Investments](#)

In general, we offer advisory services on publicly traded investments, where information about the investment is available to the public. This includes stocks, bonds, mutual funds and exchange-traded funds (ETFs). We will on occasion review privately offered investments for a client if reliable information is made available to us. We also offer limited advice on 529 or Annuity sub accounts if the account's performance and holdings are available. We do not offer advice on Hedge Funds, which do not publicly provide information about their strategies, objectives, holdings and outlook.

We tailor our advisory services to the needs of our clients. We invest a lot of time and resources to learn about our clients' entire financial position, goals, demographics and preferences. We advise clients based on their needs. Clients may impose restrictions on investing in certain securities or types of securities. For example, if a client does not like a certain company for moral or religious reasons, we do respect their wishes.

We do not participate in wrap fee programs.

As of December 2025, we manage a total of \$424,939,395 on a discretionary basis and \$767,531 on a non-discretionary basis. OMNI also advises on a number of 401(k) retirement plans that totaled approximately \$42,637,947.

## Item 5 Fees and Compensation

- 1) OMNI 360 Wealth, Inc. bases its fees on either:
  - a) A percentage of assets under management or
  - b) Hourly charges or
  - c) Fixed fees for a project such as a financial plan or portfolio analysis or
  - d) Subscription Services based on set fee

OMNI 360 Wealth, Inc. provides investment supervisory services in the form of discretionary asset management.

We work with each client to establish mutually agreed-upon investment guidelines for each account. These guidelines include allowable ranges for asset allocation, types of securities permitted or prohibited. OMNI then has discretionary authority to select monitor and trade the securities with those established guidelines.

The customary fee schedule for discretionary investment advisory services, expressed as an annual percentage of assets under management or account value are:

Up to \$1,000,000	100bps or 1.00% of market value
\$1,000,000 and up	75bps or 0.75% of market value

For new households there is a minimum fee per year of \$1,000. Fees are negotiable depending on the scope, complexity and frequency of client needs.

Currently, some accounts are being charged in arrears, while legacy accounts managed with Focus Partners are being charged in advance. By Q3 2026 all accounts will be charged in arrears. Any accounts being charged in advance will be prorated and refunded for services terminated prior to quarter end.

Financial Planning or non-discretionary investment advisory services are charged either on a fixed fee, hourly or subscription basis. The fixed fee for an initial plan with one year of follow-up can range from \$1,500 - \$18,000. Fees are billed when the initial plan is reviewed with the client.

Annual Updates of a financial plan range from \$1,000 - \$12,000 per year. The maximum deposit required for an annual retainer is \$500.

The standard hourly rate for financial planning services is \$320 for partners, \$280 for senior advisors, \$180 for junior advisors and \$90 for administrative staff. Hourly fees are billed either at the end of a project or on a monthly basis, depending on the time frame. Hourly rates may be discounted for clients under a fixed fee agreement.

The subscription-based model is charged on a monthly or quarterly basis for clients who wish to pay a regular flat fee. They typically have regularly scheduled meetings and likely have significant assets that are not covered by an Assets under management agreement. The annual rate can range from \$1500 to \$36,000 a year depending on the scope and complexity of the arrangement.

Fees are negotiable. In general, fees are not billed until work has been performed. Agreements canceled within 5 business days are fully refundable. Cancellations after 5 days are partially refundable on a pro rata basis.

A. Clients may elect to have fees deducted from their account or pay separately by check, ACH or credit card. We encourage clients to have fees deducted as it allows us to focus on investing rather than collections. It also mitigates any conflicts that may arise if a customer does not pay their fees for an extended period. If clients elect to pay discretionary investment advisory by check, we require a retainer of not more than \$500- or 1-year fee, whichever is less.

B. Clients may also be subject to broker commission or custody fees. We work primarily with Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) and Fidelity Investments, a division of National Financial Services, LLC (CRD# 13041) who have no custody fees on publicly traded assets. We do not typically buy non-traded assets in client accounts, however, clients at times may either instruct us to purchase them or transfer them in from another custodian. Any additional trade or custody fees are disclosed at that time.

There are nominal commissions of stocks, some exchange traded funds and close end funds. Also, some open-ended mutual funds have commissions associated with them. OMNI works to minimize the use of funds with commissions and consider the impact of any fees when choosing investments. We do not purchase investments with front or back-end loads.

Refer to ITEM 12 that discusses brokerage for further information.

C. Clients are not required to pay fees in advance unless they do not allow for account deductions for discretionary services. If that occurs, we require the lesser of \$500 or the equivalent of one-year fee.

D. OMNI and all of its employees or supervised persons do not collect compensation for the sale of securities or other investments under the OMNI umbrella.

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

OMNI 360 Wealth, Inc. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry higher degree of risk to the client. However, the nature of the asset-based fees does allow OMNI 360 Wealth, Inc. to participate in the growth of the clients' wealth to some degree. This also means that our fees can decline when the client's portfolio declines in value.

## Item 7 Types of Clients

OMNI 360 Wealth, Inc. provides investment advice to the following types of clients:

- Individuals & Families
- Trusts & Estates
- Charitable Organizations
- Businesses
- Employee Benefit Plan Sponsors (Client relationships vary in scope and length of service.)

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

OMNI 360 Wealth, Inc. security analysis methods included fundamental, technical and cyclical analysis.

**Fundamental Analysis** is an analysis of the issuing institutions financial situation, growth potential, credit worthiness. This is our primary method of analysis. Its risk is that sometimes regardless of the fundamentals, securities may be mispriced due to external factors or market sentiment.

**Technical Analysis** is when you look at price, volume and other statistics or stochastics about a security. This analysis is almost blind to the underlying fundamentals. We use this method on a limited basis and only after we have reviewed the fundamentals.

**Cyclical Analysis** is when you look at a security and its characteristics in relation to where we are in a business cycle. Certain types of investments and some market sectors have historically performed better or worse at different points in the business cycle.

We use this method of analysis in our asset allocation moves.

The primary sources of information are:

- Financial media
- Inspections of corporate activities
- Research materials prepared by others
- Corporate rating services
- SEC filings
- Company press releases

## Investment Strategies

The investment strategies used to implement any investment advice given to a client are based on the needs, objectives and situation of the client and can include:

- Long-term purchases
- Short-term purchases
- Trading
- Margin transactions
- Options writing, including covered options, naked options, spread and straddle strategies.

## Risk of Loss

All investments carry certain risks that are borne by the investor. Our investment approach attempts to minimize risk by diversification and by aligning the investments with the client's goals. With all investments, investors face risk including loss of principal, interest rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk and financial risk.

## Item 9 Disciplinary Information

OMNI 360 Wealth, Inc. and its employees have not been involved in any legal or disciplinary events related to past or present activities.

## Item 10 Other Financial Industry Activities and Affiliations

### Activities

OMNI 360 Wealth, Inc. does participate in tax planning, business consulting and treasury management for businesses.

### Affiliations

OMNI 360 Advisors, LLC is owned by:

- 32.30% James Colitsas, CPA
- 32.30% Neel Shah, Esq, CFP®
- 12.07% Estate of Thomas Colitsas, EA, Public Accountant
- 17.71% Linda J. Farinola, CFA, CFP®, EA
- 5.63% Joyce Morrison

OMNI 360 Advisors, LLC. owns the following subsidiaries:

- OMNI 360 Wealth Inc. a registered investment advisor.
- OMNI 360 Tax, Consulting & Accounting, LLC (Omni 360 TC&A) an accounting firm performing tax, consulting and accounting services
- OMNI 360 Risk Management, LLC. a licensed NJ insurance agency. This company started to sell life and health insurance in 2018. As a result, OMNI is no longer a pure fee only firm.

Omni 360CPA's, LLC (formerly, Princeton Financial Group, LLC) related CPA firm is owned 54% by James G. Colitsas, CPA, 16% by the Estate of Thomas Colitsas, EA and Public Accountant, 23% by Linda Farinola, CFP(r), CFA, EA and 7% by Joyce Morrison..

Linda J. Farinola is the founder, manager and former owner of OMNI 360 Wealth, Inc.. She is also an Enrolled Agent and a tax preparer and consultant for Omni 360 TC&A. . Linda does charge for tax planning and consulting services. She is also a registered investment advisory representative for Omni 360 Wealth, Inc.

James G. Colitsas, CPA is a majority owner and manager of OMNI 360 CPAs, LLC. He is also part owner of OMNI 360 Advisors, LLC. He is also a registered investment advisory representative for OMNI 360 Wealth, Inc.

Neel G. Shah, Esq. CEPA, CFP® is part owner of Omni 360 Advisors, LLC. He is also owner and manager of Shah & Associates, P.C. d/b/a Omni Legacy Law. Neither Omni 360 Wealth, nor Neel G. Shah receives direct compensation for services provided by Omni Legacy Law. Neel is an estate attorney, CFP® and Certified Exit Planning Advisor. He is also a registered investment advisory representative for Omni 360 Wealth, Inc. Neel also holds a Life & Health insurance license.

Neel G. Shah and Bryan P. Katz both have life insurance licenses in the State of New Jersey. We have our insurance licenses so that we can offer advice about insurance as part of the financial planning done with OMNI 360 Wealth, Inc.. Neither Neel, Bryan nor OMNI 360 Wealth, Inc. receive any commissions for the sale of insurance directly.

Bryan P. Katz is a registered investment advisor representative with OMNI 360 Wealth, Inc.. He manages our affiliate company Omni 360 Risk Management, LLC which receives commission for insurance written through that affiliate. Bryan's compensation is dependent on part by the commissions received by the company.

James G. Colitsas is a member of Carnegie Holdings, LLC with a number of individuals who are clients of both OMNI 360 Tax, Consulting & Accounting, LLC and OMNI 360 Wealth, Inc.. Carnegie Holdings, LLC, an owner of 777 Property Management, LLC, purchased a building in 2021, and OMNI 360 Advisors, LLC and OMNI 360 Wealth, Inc. are a tenant of the property.

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

OMNI 360 Wealth, Inc. and its employees abide by the code of ethics established by the following professional organizations:

- CFP® Board of Standards
- CFA Institute
- National Association of Enrolled Agents

In general, the principals include:

- Integrity
- Objectivity
- Competence
- Fairness
- Confidentiality
- Professionalism Diligence

A copy of the Code of Ethics is available upon request.

## Participation or Interest in Client Transactions

OMNI 360 Wealth, Inc., and its employees may at times buy or sell securities that are also held by clients. These transactions are kept track of and are available for viewing by clients upon request. Employees may not trade their own securities ahead of client trades. Employees may also not sell or buy from a client.

Employee trades are not significant enough to affect the securities markets.

## Item 12 Brokerage Practices

### Selecting Brokerage Firms

OMNI 360 Wealth, Inc. as a firm does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for services. OMNI recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at a reasonable commission rate, the quality of client service and availability of products.

OMNI recommends discount brokerage firms and trust companies (qualified custodians) such as Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) or Fidelity Investments, a division of National Financial Services, LLC (CRD# 13041). OMNI does not receive fees or commissions from these arrangements, although OMNI may benefit from electronic delivery of client information, electronic trading platforms and other services provided to the custodians for the benefit of the client. OMNI may also benefit from other services provided by custodians, such as research, continuing education and practice management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions. In general, we utilize Fidelity Investments, a division of National Financial Services, LLC (CRD# 13041) and Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD# 5393) for all discretionary clients as it allows us to provide better service to our clients.

Receiving research, services and/or products from brokerage firms is a conflict of interest as it could provide incentive for OMNI 360 Wealth, Inc. to recommend a broker-dealer based on its interests rather than the clients. For this reason, we do not receive commissions from brokerage firms.

OMNI 360 Wealth, Inc., reviews the execution of trades and fees charged by the custodian on an annual basis.

### Soft Dollars

OMNI 360 Wealth, Inc. does not receive soft dollar benefits from the custodians or brokers that we recommend to clients.

### Direct Brokerage

OMNI 360 Wealth, Inc. does direct brokerage for fixed income OTC investments. OMNI chooses the broker based on security, price, product availability and service.

OMNI does not recommend, request or require that a client direct us to execute transactions through a specific broker dealer. OMNI has no affiliation or economic relationship that creates a material conflict of interest. By directing brokerage OMNI may be unable to achieve most favorable execution of the client transactions or the client may receive less favorable prices. For this reason, we limit broker directed trades to those OTC trades where the broker has presented value by offering a security that fits well with the client that may not be readily available elsewhere at an attractive price.

To date we have never had a client request to direct brokerage, and we would discourage it if requested. OMNI would permit a client to direct brokerage; however, the client would be required to sign a disclosure that by directing the transaction to another broker, they would be subject to higher commissions and that client may receive less favorable prices.

OMNI does aggregate the purchase or sale of securities for various client accounts. When OMNI purchases or sells the same security across multiple client accounts, it will aggregate those transactions and then allocate the trade across the portfolios. This practice ensures that no one client has a benefit over another in terms of price or quantity.

## Item 13 Review of Accounts

Valerie Zaffuto conducts regular reviews of transactions and supervisory accounts on an ongoing basis. Changes in market value and conditions are monitored and investigated in a timely manner. Daily access to account value is available to OMNI 360 Wealth, Inc. and to the client upon request.

Financial plans are prepared and reviewed by Linda J. Farinola, James G. Colitsas, Neel Shah or Bryan Katz before being presented to clients. The scope of a financial plan is agreed upon with each individual client and documented in an engagement letter. These plans generally include some or all of the following components.

- Net Worth Statement
- Cash Flow report - current and projected
- Asset Allocation report - current and recommended.
- Retirement savings and withdrawal plan
- Tax projections and planning recommendations
- Insurance needs analysis
- Goal funding strategies and recommendations

## Regular Reports

Clients receive monthly reports showing holding, market value and activity for the period from the custodian. Other information including performance and holdings is provided in written form in accordance with the investment advisory agreement but is not less frequent than quarterly.

These regular quarterly reports include the following information

- Beginning and ending value of the portfolio for the quarter, year-to-date, inception-to-date and the components of the value change.
- Investment return for the portfolio for the period(s) and comparable market indexes and benchmarks

- Asset Allocation of the portfolio
- Value of the portfolio in relation to capital invested
- Detailed listing of the investments including cost basis

The client generally triggers regular reviews of financial plans. However, significant changes in market conditions tax laws or economics can also trigger a review by the advisor.

Portfolio Management Reports for both discretionary and non-discretionary clients are created periodically with the following information that is obtained from Morningstar. OMNI generally uses these reports internally and provided to the client only upon request or as part of basis for discussion or when recommending a change in the portfolio.

- Portfolio Composition by asset class, geography, industry, bond quality, duration
- Performance of that portfolio over past 3-10 years
- Portfolio Statistics such as Sharp Ratios, Alpha, Beta or other risk/reward data and illustrations

## Item 14 Client Referrals and Other Compensation

### Incoming Referrals

OMNI 360 Wealth, Inc. has received many referrals over the years, mostly from colleagues and existing clients. OMNI does not receive any economic benefit from a non-client for providing advice to clients.

### Referrals to Other Professionals

OMNI does not accept referral fees in any form of remuneration from other professions when a prospect or a client is referred to them. We generally recommend clients to those professionals that provide good service, reasonable prices and a pleasant, professional working relationship.

## Item 15 Custody

### Account Statements

All assets are held at qualified custodians, who provide account statements directly to clients at their address of record. Occasionally, qualified clients may invest in private placements which are not held at qualified custodians. In these cases, statements are generally provided directly by the investment principal at least annually. Clients should carefully review statements provided by their custodians and should compare them to statements received from OMNI.

### Statements Provided by OMNI 360 Wealth, Inc.

Discretionary asset management clients are provided with account statements and performance reports on a quarterly basis. Brokerage statements and OMNI statements are reconciled not less than monthly for both quantity and cost basis. On an annual basis we will also provide net worth statements and tax reports as requested.

## Custody

OMNI 360 Wealth, Inc. does not hold any client funds or investments in its name.

OMNI does charge its fees directly to client accounts on a quarterly basis. When it deducts fees directly from client accounts at a selected custodian, OMNI will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

OMNI does have the ability to move money from the advisory accounts to a like-titled account at another institution if the client has the appropriate signed forms on file with us and the custodian. OMNI also has the ability to move money from a joint account to one of the individual accounts, provided both parties sign the appropriate forms. OMNI does maintain the ability to move funds to an outside party that is not named on the account only with appropriate client paperwork. OMNI confirms all move money requests verbally with the client.

The SEC has interpreted having the ability to move funds to or from an individual account or to or from a joint account as having custody of client funds. We work diligently with Schwab Institutional and Fidelity Investments to accomplish the following seven steps of the 2017 No-Action Letter for each such arrangement.

- 1) The client provides an instruction to the qualified custodian, in writing, which includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- 2) The client authorizes the RIA, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- 3) The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- 4) The client has the ability to terminate or change the instruction to the client's qualified custodian.
- 5) The RIA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- 6) The RIA maintains records showing that the third party is not a related party of the RIA or located at the same address as the RIA.
- 7) The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

OMNI may also be deemed to have custody over the funds and securities of trust accounts for which it or its related persons serve as trustee.

## Item 16 Investment Discretion

### Investment Discretion

OMNI 360 Wealth, Inc.. accepts discretionary authority to manage securities accounts on behalf of clients under an Asset Management agreement. Trading is done within the framework of investment guidelines that are reviewed with and approved by the client.

### Limited Power of Attorney

Clients must sign a limited power of attorney before OMNI 360 Wealth, Inc. is given discretionary authority to trade or charge fees. Limited power of attorney is included in the qualified custodian's account application.

## Item 17 Voting Client Securities

OMNI 360 Wealth, Inc. does not vote client proxies for mutual funds, stocks, ETFs or any other securities. OMNI receives informational copies.

Clients will receive their proxies or other solicitations directly from the custodian or transfer agent. Clients may contact OMNI via phone or E-mail with questions about a particular solicitation.

## Item 18 Financial Information

### Financial Condition

OMNI 360 Wealth, Inc. does not have any financial impairment that will prevent the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because OMNI 360 Wealth, Inc. does not serve as a custodian for client funds or securities and does not require a prepayment fee of more than \$500 per client, six months or more in advance. We do maintain more than the minimum capital required by the State of New Jersey.

OMNI 360 Wealth, Inc. has not been the subject of a bankruptcy petition at any time.