

Form ADV Part 2A: *Firm Brochure*

Item 1 – Cover Page

Pacific Excel Wealth Advisors, Inc.

925 Ygnacio Valley Rd., STE 200

Walnut Creek, California 94596

(925) 464-7445

<https://www.pacificexcel.com/>

Date of Disclosure Brochure: July 2025

This disclosure brochure provides information about the qualifications and business practices of Pacific Excel Wealth Advisors, Inc. (also referred to as we and us throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Nathan Sadowski at (925) 464-7445 or nathan@pacificexcel.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Pacific Excel Wealth Advisors, Inc. is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Pacific Excel Wealth Advisors, Inc. or our firm's CRD number 172356.

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

Item 2 – Material Changes

Pacific Excel Wealth Advisors, Inc. is a newly registered investment adviser, and this disclosure brochure dated July 2025 is the first disclosure brochure prepared by our firm. In the future, this item will discuss only specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes. We will also reference the date of the last annual update of this disclosure brochure.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	9
Item 6 – Performance-Based Fees and Side-By-Side Management	13
Item 7 – Types of Clients	13
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	13
Item 9 – Disciplinary Information	16
Item 10 – Other Financial Industry Activities and Affiliations	17
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	18
Item 12 – Brokerage Practices	19
Item 13 – Review of Accounts	20
Item 14 – Client Referrals and Other Compensation	21
Item 15 – Custody	21
Item 16 – Investment Discretion	22
Item 17 – Voting Client Securities	22
Item 18 – Financial Information	22
Customer Privacy Policy Notice	22
Business Continuity Plan	24

Item 4 – Advisory Business

Pacific Excel Wealth Advisors, Inc. is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a S-corporation formed under the laws of the State of California.

- Nathan Sadowski is the President and Chief Compliance Officer (CCO) of Pacific Excel Wealth Advisors, Inc. Nathan Sadowski owns 100% of Pacific Excel Wealth Advisors, Inc.
- Pacific Excel Wealth Advisors, Inc. filed its initial application to become registered as an investment adviser in July 2025.
- Pacific Excel Wealth Advisors, Inc. was formed in 2013. Prior to registering as an investment adviser, Nathan Sadowski was registered as an investment adviser representative and provided advisory services through other investment adviser firms. He used Pacific Excel Wealth Advisors, Inc. as a marketing name when providing advisory services through other firms. For information about Mr. Sadowski education and business background please refer to his Form ADV Part 2B: *Brochure Supplement*, a copy of which is provided to new clients with this brochure.

Introduction

The investment advisory services of Pacific Excel Wealth Advisors, Inc. are provided to you through an appropriately licensed individual who is an investment adviser representative of Pacific Excel Wealth Advisors, Inc. (referred to as your investment adviser representative throughout this brochure).

Description of Advisory Services

The following are descriptions of the advisory services of Pacific Excel Wealth Advisors, Inc. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Pacific Excel Wealth Advisors, Inc. before we can provide you the services described below.

We typically start all new client relationships with a financial plan. After completing the financial planning process, most clients will retain us for Investment Management Services. However, you are never required or obligated to hire us for Investment Management Services and can work with any investment professional of your choice to implement our financial planning recommendations.

Financial Planning Services - Pacific Excel Wealth Advisors, Inc. offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics.

We provide full or modular written financial plans, which can address the following topics as determined and agreed with each client. Financial planning services are always customized and provided based on the unique needs and circumstances of the individual client.

- Asset Allocation,
- Budgeting,
- Business Advisory Planning,
- Cash Flow Analysis,
- College/Education Planning,

- Equity Compensation Planning,
- Estate Planning,
- Investment Planning,
- Philanthropic Advisory
- Retirement Planning,
- Risk Management,
- Social Security Optimization,
- Tax Planning, and
- Wealth Transfer.

When providing financial planning services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. Financial planning is the process we use to help our clients clarify their priorities. With a clear, “living” financial plan, you will have a better understanding of where you stand financially and where you are going.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations. To the extent that you would like to implement any of our investment recommendations through Pacific Excel Wealth Advisors, Inc. or retain Pacific Excel Wealth Advisors, Inc. to actively monitor and manage your investments, you must execute a separate written agreement with Pacific Excel Wealth Advisors, Inc. for our Investment Management Services.

Investment Management Services – Pacific Excel Wealth Advisors, Inc. offers *Investment Management Services*, which involves Pacific Excel Wealth Advisors, Inc. providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the “Account”). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account. See Item 12 – *Brokerage Practices* and Item 15 – *Custody* for more information.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

As an investment adviser registered under the Investment Advisers Act of 1940, we owe clients a fiduciary duty to put client interests first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that

comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit. See Item 11 - *Code of Ethics, Participation in Client Transactions and Personal Trading* for more information.

Services are provided through the AssetMark Platform, which is sponsored by AssetMark, Inc., an SEC-registered investment advisor not affiliated with our firm.

The AssetMark Program has different components. The one we utilize and will therefore recommend to you is the **Advisor-Managed Platform** which allows us to manage client assets based on your financial situation, investment objectives and risk tolerance. We will actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account. Refer to Item 16 – *Investment Discretion* for more information.

We will need to obtain certain information from you to determine your financial situation and investment objectives. Accounts are therefore managed on the basis of your individual financial situation and investment objectives. Accounts are managed on a continuous basis. At predetermined intervals, but no less than annually, you are reminded to notify us whether your financial situation or investment objectives have changed, or if you want to impose and/or modify any reasonable restrictions on the management of your accounts. At least annually, we contact individual clients to determine whether their financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of accounts managed.

We are always reasonably available to consult with individual clients relative to the status of their accounts. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to not hold certain securities. Your beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account. A separate account is maintained for each client with the custodian and clients retain right of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Referral of Third-Party Money Managers - Pacific Excel Wealth Advisors, Inc. also offers advisory services by referring clients to one or more third-party money managers offering investment management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

Depending on the money manager selected, we can be paid a portion of the fee charged and collected by the third-party money managers in the form of promoter fees. Each arrangement is performed pursuant to a written agreement and is in compliance with SEC Rule 206(4)-1 and applicable state securities rules and regulations.

In other situations, we charge a fee completely separate from the fee and/or expenses received by the money manager.

Under this program, we assist you with identifying your risk tolerance and investment objectives. We recommend third-party money managers in relation to your stated investment objectives and risk tolerance, and you may select a recommended third-party money manager or model portfolio based upon your needs. You must enter into an agreement directly with the third-party money manager who provides your designated account with investment management services.

We are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager will take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms. Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm. Please refer to *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss* for more details.

Retirement Plan Rollover Recommendations - When Pacific Excel Wealth Advisors, Inc. provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that Pacific Excel Wealth Advisors, Inc. is a **"fiduciary"** within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC") as applicable, which are laws governing retirement accounts. The way Pacific Excel Wealth Advisors, Inc. makes money creates conflicts with your interests so Pacific Excel Wealth Advisors, Inc. operates under a special rule that requires Pacific Excel Wealth Advisors, Inc. to act in your best interest and not put our interest ahead of you.

Under this special rule's provisions, Pacific Excel Wealth Advisors, Inc. must as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put the financial interests of Pacific Excel Wealth Advisors, Inc. ahead of you when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Pacific Excel Wealth Advisors, Inc. gives advice that is in your best interest;
- Charge no more than is reasonable for the services of Pacific Excel Wealth Advisors, Inc.; and
- Give the client basic information about conflicts of interest.

To the extent we recommend you roll over your account from a current retirement plan account to an individual retirement account managed by Pacific Excel Wealth Advisors, Inc., please know that Pacific Excel Wealth Advisors, Inc. and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by Pacific Excel Wealth Advisors, Inc. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by Pacific Excel Wealth Advisors, Inc.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

we have taken steps to manage this conflict of interest. we have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in Pacific Excel Wealth Advisors, Inc. receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by Pacific Excel Wealth Advisors, Inc. and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of Pacific Excel Wealth Advisors, Inc. or our affiliated personnel.

Advice to Certain Types of Investments

Pacific Excel Wealth Advisors, Inc. provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Corporate Debt Securities
- Certificates of Deposit
- Municipal Securities
- US Government Securities
- Options Contracts on Securities
- Equities (e.g., individual stock positions), Fixed Income Positions (e.g., bonds)

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss* for more information.)

Participation in Wrap Fee Programs

Pacific Excel Wealth Advisors, Inc. offers Asset Management Services through the AssetMark Platform which is a wrap-fee program. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions. Whenever a fee is charged to a client for services described in this brochure (whether wrap fee or non-wrap fee), we will receive all or a portion of the fee charged.

Tailor Advisory Services to Individual Needs of Clients

Pacific Excel Wealth Advisors, Inc.'s advisory services are always provided based on your individual needs. This means, for example, that when we provide investment management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. Our financial planning services are always provided based on your individual needs. When providing financial planning services, we work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Client Assets Managed by Pacific Excel Wealth Advisors, Inc.

As a newly registered investment adviser, Pacific Excel Wealth Advisors, Inc. has no assets under management to report as of the date of this Brochure (July 2025).

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Pacific Excel Wealth Advisors, Inc.

Fees for Financial Planning Services

Pacific Excel Wealth Advisors, Inc. provides financial planning services under a fixed fee arrangement. A mutually agreed upon fixed fee is charged for financial planning services under this arrangement. There is a range in the amount of the fixed fee charged by Pacific Excel Wealth Advisors, Inc. for financial planning services. The minimum fixed fee is generally \$750, and the maximum fixed fee is generally no more than \$10,000.

The amount of the fixed fee for your engagement is specified in your financial planning agreement with Pacific Excel Wealth Advisors, Inc. Upon completion and delivery of the financial plan, the agreed upon fixed fee is due.

The financial planning services terminate thirty (30) days following the delivery of the written financial plan or either you or Pacific Excel Wealth Advisors, Inc. providing the other party with written notice.

If you terminate the financial planning services after entering into an agreement with us, you will be responsible for immediate payment of any financial planning services performed by Pacific Excel Wealth Advisors, Inc. prior to the receipt by Pacific Excel Wealth Advisors, Inc. of your notice of termination.

For financial planning services performed by Pacific Excel Wealth Advisors, Inc. under a fixed fee arrangement, you will pay Pacific Excel Wealth Advisors, Inc. a pro-rated fixed fee equivalent to the percentage of work completed by Pacific Excel Wealth Advisors, Inc. as determined by Pacific Excel Wealth Advisors, Inc.

If you are not satisfied with the financial plan prepared by Pacific Excel Wealth Advisors, Inc., we may waive our fee; however, in such a situation, Pacific Excel Wealth Advisors, Inc. retains intellectual property rights over any written financial plan prepared by Pacific Excel Wealth Advisors, Inc., and the written financial plan must be returned to Pacific Excel Wealth Advisors, Inc.

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly (for example, by check).

You should notify Pacific Excel Wealth Advisors, Inc. within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

All fees paid to Pacific Excel Wealth Advisors, Inc. for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

All fees paid to Pacific Excel Wealth Advisors, Inc. for financial planning services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

Fees for Investment Management Services

For our Investment Management Services, clients will be charged an annual fee based upon the amount of assets under management. Each asset tier shall be assessed a fee percentage in accordance with the schedule shown below. The cumulative fee percentage for the account shall be a blended rate based on the fee percentages applied to each asset tier. The following is our standard fee schedule which is non-negotiable.

<u>Assets Under Management</u>	<u>Annual Fees</u>
Up to \$999,999	1.50%
\$1,000,000 – \$1,999,999	1.25%
\$2,000,000 – \$4,999,999	1.00%
\$5,000,000 – \$9,999,999	0.85%
\$10,000,000+	0.75%

This is a blended fee schedule. This means that the assets in a client's account will be billed at different levels according to the fee schedule above. For example, if a client had an account value of \$3,500,000 then the blended tiered fee schedule would be 1.21%.

- 1.50% on the first \$999,999
- 1.25% on the next \$1,000,000
- 1.00% on the remaining \$1,500,001

The preceding schedule represents the fees paid to Pacific Excel Wealth Advisors, Inc. In addition, AssetMark charges a platform fee which covers the cost of all transactions executed through the program, AssetMark's compensation for the program and standard execution/transaction fees and expenses incurred by the qualified custodian. The AssetMark Platform Fee varies by investment solution but does not exceed 1.00% annually. Therefore, the maximum total advisory fee (Pacific Excel Wealth Advisors, Inc.'s fee plus AssetMark Platform Fee) charged to Pacific Excel Wealth Advisors, Inc. clients will not exceed 2.50%.

Fees charged for our investment management services are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period.

You must provide standing authorization to the qualified custodian(s) of your account for AssetMark to deduct fees from your account and pay such fees directly to AssetMark and Pacific Excel Wealth Advisors, Inc.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Any non-transaction fees and expenses charged by custodians will be charged separately from the AssetMark fee. A complete description of the AssetMark Program and related fees, charges, when due and termination procedures are described in the AssetMark, Inc. Wrap Fee Program Brochure, which will be given to all clients prior to or at the time an account is established.

Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If investment management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The Investment Management Services continue in effect until terminated. You may terminate the services by providing Pacific Excel Wealth Advisors, Inc. with notice. Pacific Excel Wealth Advisors, Inc. may terminate the services by providing you with written notice effective 30 days after you receive the written notice. When fees are billed in arrears, Pacific Excel Wealth Advisors, Inc. will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

Non-transaction fees and expenses assessed by the qualified custodian are billed directly to you by the qualified custodian. Pacific Excel Wealth Advisors, Inc. does not receive any portion of fees from you or the qualified custodian. In addition, you will incur certain charges imposed by third parties other than

Pacific Excel Wealth Advisors, Inc. in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by Pacific Excel Wealth Advisors, Inc. are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus. We do not receive any portion of such "other" fees and expenses. The only fee we receive is our investment management fee described at the beginning of this section.

Fees for Third-Party Money Managers

The maximum fee we charge for assets managed by third-party money managers is 0.85% annually. We will not charge or assess an advisory fee directly to you. All fees are calculated and collected by the third-party money manager, in accordance with their fee billing procedures, who will be responsible for delivering our portion of the fee paid by you to us.

Fees charged and/or expense incurred by third-party managers are separate from the fees we charge. Third-party managers have account minimum requirements that will vary among third-party money managers. Account minimums are generally higher on fixed income accounts than for equity based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's Form ADV Part 2A disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.

The actual fee charged to you will vary depending on the third-party money manager, with the maximum fee charged by a third-party money manager being 1.00%.

Some third-party money managers we recommend do not assess a standard management fee in addition to the fee we receive. Instead, the third-party manager will manage the client's using models developed by third-party manager that contain affiliated/proprietary funds and third-party funds and therefore receive directly or indirectly the fees/expenses incurred through the affiliated/proprietary funds. The fact that such third-party managers use proprietary mutual funds and ETFs is a conflict of interest. While in some cases a proprietary fund may have management fees and expenses or performance that differs from other mutual fund or ETF alternatives, and while the third-party manager has an incentive to use a proprietary fund that pays a higher management fee than another proprietary fund, in each case where a proprietary fund is selected for incorporation in a strategy, the third-party manager will represent that it has determined that each specific proprietary fund to be used is an appropriate security to implement the third-party manager's investment model strategies. The third-party manager may increase or decrease the amount of proprietary funds used in any model at any time.

You can incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, transaction fees/expenses, and IRA and qualified retirement plan fees.

We have a conflict of interest by only offering those third-party money managers meet the conditions of our due diligence review. There may be other third-party money managers that may be suitable for you that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

Third-party money managers are registered or exempt from registration as an investment adviser in the state where you reside.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Pacific Excel Wealth Advisors, Inc. provides investment advice to retail investors which can be defined as individual-natural person clients including high-net worth individuals. We also provide services to small companies and their owners.

Minimum Investment Amounts Required

Pacific Excel Wealth Advisors, Inc. requires a minimum of \$250,000 in order to open an account through our Investment Management Services program. To reach this account minimum, clients can aggregate all household accounts. Exceptions may be granted to this minimum for expectation of anticipated contributions/assets, the relationship of the client to other clients, the relationship of the client to Pacific Excel Wealth Advisors staff members, and other circumstances determined by the firm.

The minimum fixed fee generally charged for financial planning services on a fixed fee basis is \$750.

Third-party money managers may have minimum account and minimum fee requirements in order to participate in their programs. Each-third party money manager will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure.

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

Methods of Analysis

Pacific Excel Wealth Advisors, Inc. uses the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors.

Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Investment Strategies

Pacific Excel Wealth Advisors, Inc. uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Value-Investing. We follow a value-investing strategy that attempts to acquire at reasonable valuations publicly traded businesses that can deliver sustainable excess returns. We focus on a long-only strategy. Long term strategies are designed to identify and select investments to be held for multiple years. We will also invest in value oriented special situations with shorter expected holding periods.

Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e. businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Do Not Primarily Recommend One Type of Security

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.
- Third-Party Money Manager Fraud Risk - When using a third-party money manager, there is a risk that the third-party money manager may misappropriate client funds or assets. Although Pacific Excel Wealth Advisors, Inc. performs due diligence when selecting third-party money manager, Pacific Excel Wealth Advisors, Inc.'s services are not designed to detect or prevent the loss of a client's funds due to fraud perpetrated by an unaffiliated third-party.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Pacific Excel Wealth Advisors, Inc. is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

As described in *Item 4 – Advisory Business* and *Item 5 – Fees and Compensation*, Pacific Excel Wealth Advisors, Inc., has a relationship with AssetMark, Inc. an independent, third-party investment adviser. As disclosed in those items, Pacific Excel Wealth Advisors, Inc. will recommend the AssetMark platform to clients. When Pacific Excel Wealth Advisors, Inc. refers clients to AssetMark, you need to know that the firm will receive a portion of the fee charged by AssetMark. Therefore, we have a conflict of interest in that our decision to recommend AssetMark is not based exclusively on our client's interest of receiving the most favorable execution. Our decision is also based on the ease of business operations we receive for using AssetMark and the fact that we receive a portion of the fees billed to your AssetMark. Please refer to Item 5 for more information.

Pacific Excel Wealth Advisors, Inc. has developed a program, previously described in *Item 5* of this disclosure brochure, designed to allow us to recommend and select third-party money managers for you. Once you select the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay us a portion of the fees you are charged. Please refer to *Items 4 and 5* for full details regarding the programs, fees, conflicts of interest and materials arrangements when Pacific Excel Wealth Advisors, Inc. selects other investment advisers.

Insurance Agent

You may work with your investment adviser representative in his or her separate capacity as an insurance agent through our affiliated company, Pacific Excel Insurance Services, Inc. This insurance sales activity is independent of and outside the scope of the investment adviser representative's affiliation with our investment adviser firm. When acting in his or her separate capacity as an insurance agent, the investment adviser representative can sell, for commissions, general disability insurance, life insurance, annuities, group medical, long term care, medical solutions, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, can recommend that you implement recommendations of Pacific Excel Wealth Advisors, Inc. by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you is biased, and your investment adviser representative has a conflict of interest when acting as an insurance agent.

It is important for clients to understand that when acting in this separate capacity as a licensed insurance agent, this individual is not acting as a fiduciary and does not have the same obligations to act solely in the best interest of the client as when providing investment advisory services through our investment adviser firm.

You are encouraged to inquire about the compensation arrangements related to insurance products. You should carefully evaluate insurance recommendations made by your investment adviser representative in his separate as an insurance agent and consider whether to obtain a second opinion from a third party. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

According to the *Investment Advisers Act of 1940*, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Pacific Excel Wealth Advisors, Inc. has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the *Investment Advisers Act of 1940* that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The Code of Ethics covers all individuals that are classified as “supervised persons”. All employees, officers, directors and investment adviser representatives are classified as supervised persons. Pacific Excel Wealth Advisors, Inc. requires its supervised persons to consistently act in your best interest in all advisory activities. Pacific Excel Wealth Advisors, Inc. imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Pacific Excel Wealth Advisors, Inc. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Pacific Excel Wealth Advisors, Inc. or supervised persons of the firm buy and sell for their personal accounts, investment products identical to those recommended to clients. This creates a conflict of interest. It is the express policy of Pacific Excel Wealth Advisors, Inc. that all persons associated in any manner with our firm must place clients’ interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, Pacific Excel Wealth Advisors, Inc. and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations.

To mitigate conflicts of interest that can occur when access persons manage their personal accounts at the same time Pacific Excel Wealth Advisors, Inc. manages client accounts, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, supervised persons):

- Supervised persons cannot prefer their own interests to that of the client.
- Supervised persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Supervised persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that

information is also available to the investing public upon reasonable inquiry.

- Supervised persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider”.
- Supervised persons are discouraged from conducting frequent personal trading.
- Supervised persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Pacific Excel Wealth Advisors, Inc.

Any supervised person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

Financial planning clients are not obligated or required to implement investment recommendations through Pacific Wealth Advisors and are so informed. Clients can work with any investment professional of their choosing.

Clients that would like us to implement our investment recommendations will need to execute our Investment Management Services agreement. When Pacific Excel Wealth Advisors, Inc. is responsible for the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

If you elect to utilize our management services, we recommend clients establish accounts through AssetMark, Inc.’s affiliated custodian, AssetMark Trust Company. Additionally, AssetMark allows clients to utilize Fidelity and Charles Schwab & Company, Inc. Clients are allowed to use one of these three custodians. Clients that come to us with an account already held at Schwab will typically keep the Schwab account. Similarly, the decision to use Fidelity is most commonly based on the client already having a Fidelity account.

AssetMark (along with Fidelity and Schwab) also make available to Pacific Excel Wealth Advisors, Inc. other products and services that we benefit from but may not benefit your accounts. Some of these other products and services assist us in managing and administering client accounts. These include software and other technology that:

- Provide access to client account data (such as trade confirmation and account statements)
- Facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts)

- Provide research, pricing information and other market data
- Facilitate payment of our fees from client accounts
- Assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of our accounts. AssetMark, Fidelity and Schwab also make available other services intended to help us manage and further develop our business. These services may include:

- Consulting, publications and conferences on practice management
- Information technology
- Business succession
- Regulatory compliance
- Marketing.

In addition, Fidelity may make available, arrange and/or pay for these types of services rendered to Pacific Excel Wealth Advisors, Inc. by independent third-parties providing these services to us. As a fiduciary, we endeavor to act in your best interest. Our requirement that you maintain your assets in accounts through the AssetMark Platform is based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by AssetMark, Fidelity and Schwab. This creates a conflict of interest.

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular custodian or broker/dealer, Pacific Excel Wealth Advisors, Inc. may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Pacific Excel Wealth Advisors, Inc. has decided to require our clients to use broker/dealers and other qualified custodians determined by Pacific Excel Wealth Advisors, Inc.

Block Trading Policy

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. Pacific Excel Wealth Advisors, Inc. does not engage in block trading.

It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts; we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor,

reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by Nathan Sadowski, President and Investment Adviser Representative, with reviews performed in accordance with your investment goals and objectives.

Accounts established and maintained with other third-party money managers are reviewed at least quarterly, usually when statements and/or reports are received from the money manager.

Our financial planning services terminate upon thirty (30) days following the delivery of the written financial plan. Our financial planning services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements in writing directly from the qualified custodian.

Whether reports by an outside money manager are provided to you will depend upon the outside money manager.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by Pacific Excel Wealth Advisors, Inc.

Item 14 – Client Referrals and Other Compensation

Pacific Excel Wealth Advisors, Inc. does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Pacific Excel Wealth Advisors, Inc. receives no other forms of compensation in connection with providing investment advice.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Pacific Excel Wealth Advisors, Inc. does not take custody of client funds and securities, including the ability to debit advisory fees from client accounts as all fees are deducted by AssetMark. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

We have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against invoices and reports received from Pacific Excel Wealth

Advisors, Inc. When clients have questions about their account statements, they should contact Pacific Excel Wealth Advisors, Inc. or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

When providing Investment Management Services, Pacific Excel Wealth Advisors, Inc. maintains trading authorization over your Account and will provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Pacific Excel Wealth Advisors, Inc. so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Pacific Excel Wealth Advisors, Inc. does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account. You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

With respect to assets managed by a third-party money manager, we will not vote the proxies associated with these assets. You will need to refer to each third-party money manager's disclosure brochure to determine whether the third-party money manager will vote proxies on your behalf. You may request a complete copy of third-party money manager's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party money manager or by contacting Pacific Excel Wealth Advisors, Inc. at the address or phone number indicated on Page 1 of this disclosure document.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Pacific Excel Wealth Advisors, Inc. does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Pacific Excel Wealth Advisors, Inc. has not been the subject of a bankruptcy petition at any time.

Customer Privacy Policy Notice

The information contained in this section is also detailed in the *Privacy Requirements* section of Pacific Excel Wealth Advisors, Inc.'s *Compliance Policies and Procedures Manual*. This statement is provided to all clients in accordance with the rules and regulations of *Regulation S-P*.

As an investment adviser, Pacific Excel Wealth Advisors, Inc. Inc. and its investment adviser representatives will gather and develop personal information regarding our clients. This information will be gathered and developed by us for the following purposes:

1. To determine the client's financial goals and objectives
2. To determine the level of advisory services needed and desired by the client
3. To provide the client with specific recommendations regarding advisory services
4. To provide the client with specific recommendations regarding financial products
5. To provide ongoing support and recommendations regarding financial products held in the client's account

Client information that Pacific Excel Wealth Advisors, Inc. Inc. will collect may include, but not be limited to the following:

- Information received from clients on financial inventories through consultations with its representatives. This information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning the clients' financial conditions and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wrap account transactions.
- Information about clients' financial products and services transactions with Pacific Excel Wealth Advisors, Inc. Inc.

All information provided by clients to Pacific Excel Wealth Advisors, Inc. Inc. (including our investment advisor representatives and administrative personnel), and information and advice furnished by Pacific Excel Wealth Advisors, Inc. Inc. to you, is treated as confidential and not disclosed to affiliated or unaffiliated third parties, except as (1) permitted by you with written authorization, (2) shared in a manner necessary to facilitate the advisory services provided by Pacific Excel Wealth Advisors, Inc. Inc. or (3) as required by any rule, regulation or law of any regulatory or self-regulatory organization to which Pacific Excel Wealth Advisors, Inc. Inc. or our investment advisor representatives may be subject.

For example: you may ask Pacific Excel Wealth Advisors, Inc. Inc. to provide information to your other services providers, such as your accountant, and we are pleased to be of assistance when you direct us to share information. Regulatory and self-regulatory bodies generally conduct routine audits of investment advisers to review books and records, and in the process may review client information. Additionally, your account custodians and their personnel will have access to and review client data for their internal purposes.

When a client account is closed, Pacific Excel Wealth Advisors, Inc. Inc. will continue to keep all client information confidential in accordance with the principles stated in its privacy policy.

A copy of the Privacy Policy Notice will be delivered to all clients in writing by at least one of the following methods:

- By hand delivering a copy to the client
- Mailing a copy to the client's address on record
- If business is conducted electronically, a notice may be posted on an electronic site as long as the client acknowledges receipt of the Privacy Policy Notice prior to the client obtaining any services or products from Pacific Excel Wealth Advisors, Inc. Inc.

A copy of the Privacy Policy Notice will be provided to the client no later than the time a client establishes a relationship with Pacific Excel Wealth Advisors, Inc. Inc., unless this situation would cause a delay in the client obtaining services and the client agrees to accept the notice at a later date. When this situation applies, a copy of the Privacy Policy Statement will be delivered to the client within a reasonable time period following the transaction.

Any time a change is made to the Privacy Policy, the statement to clients will be revised. The revised statement will be given to all affected clients prior to any disclosure of information. In addition, Pacific Excel Wealth Advisors, Inc. Inc. will provide a copy of its Privacy Policy Statement to all current and existing clients at least annually.

Business Continuity Plan

Pacific Excel Wealth Advisors, Inc. has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions. Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.