

**Item 1 Cover Page  
Form ADV Part 2A**

Alluvial Wealth Management Inc.  
1234 Mann Drive, Suite 100  
Matthews, NC 28105

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

February 19, 2024

**This brochure provides information about the qualifications and business practices of Alluvial Wealth Management Inc. If you have any questions about the contents of this brochure, please contact us at 704-927-1492. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about Alluvial Wealth Management Inc. also is available on the SEC's website at <http://www.adviserinfo.sec.gov>.**

## **Item 2 Material Changes**

February 19, 2024: Item 1 Cover Page was modified with the Advisor's new principal office address.

The material changes discussed above are only those changes that have been made to this Brochure since the firm's last annual update of the Brochure. The date of the last annual update of the Brochure was March 13, 2023.

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Brochure Supplement - Craig H. Field, CPA, ABV<sup>®</sup>, President

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#### **Item 4 Advisory Business**

Alluvial Wealth Management Inc. (“Alluvial” or “Advisor”) is a state registered investment advisor firm registered with the North Carolina securities regulators since November 5, 2019.

The principal owner of Alluvial is Craig H. Field, President.

##### Advisory Services

Alluvial’s principal service is providing fee-based investment advisory services and financial planning services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The Advisor’s primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, commercial paper, CDs, municipal securities, mutual funds, and United States government securities to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

##### Pension Consulting Services

Alluvial will evaluate the existing qualified retirement plan solution(s) for defined contribution plan clients. Alluvial will evaluate at a minimum, the qualified retirement plans fiduciary compliance program, recordkeeping and third-party administration services, investment policy statement and management process, employee communication and education program, and retiree/rollover transitional consulting services.

Based on the evaluation, Alluvial will make objective recommendations to the plan sponsor. Upon approval by the plan sponsor, Alluvial will implement, manage, and monitor the recommendations.

As part of the process, Alluvial will provide an investment policy statement. Alluvial will recommend, monitor, and benchmark the selected investment platform according to the investment policy statement. Alluvial may assist the client in completing the Investment Manager’s client questionnaire and opening account paperwork. Alluvial will also assist in the development of the initial policy recommendations. In consideration for this service, Alluvial will receive an investment advisory fee, billed quarterly in arrears, and based on the value of the plan/assets on the last day of the quarter. Third-party money managers / investment managers are hired by the client. Alluvial is only making recommendations to the client about who should be hired. The investment manager will have discretion as to the model portfolios/asset allocations not the individual participants' elections, or asset allocation of any participants should they elect to

customize their own portfolio. The client, prior to entering into an agreement with a third-party money manager recommended by Alluvial will be provided with that manager's Brochure. Alluvial will also provide the plan sponsor with assistance in delivering participant investment education and enrollment meetings.

### Financial Planning

In addition to investment supervisory services, Alluvial may provide financial planning services to some of its clients. The Advisor's financial planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation, recommendations relating to investment strategies as well as tailored investment advice. Financial planning may also include non-investment advice such as developing strategies to achieve retirement or other financial goals, tax optimization strategies, cash flow and budgeting analysis and recommendations, financing and financial education, estate planning, and asset protection strategies.

Alluvial will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

Alluvial does not provide portfolio management services to wrap fee programs.

Alluvial manages client assets and as of December 31, 2023 had the following assets under management:

Discretionary assets: \$983,281

Non-discretionary assets: \$487,106

## **Item 5 Fees and Compensation**

### Asset Management Fees

Pursuant to an investment advisory contract signed by each client, including pension plans, the client will pay Alluvial an annual management fee, payable quarterly in arrears, based on the value of portfolio assets of the account on the last business day of the quarter. The management fee may be adjusted to account for significant contributions or withdrawals made to the account during the quarter. New account fees will be prorated from the inception of the account to the end of the first quarter.

<b>Assets Under Management</b>	<b>Annual Fee %</b>
\$500,000 or less	1.25%
\$500,001 to \$1,500,000	1.00%
\$1,500,001 and over	0.75%

These fees may be negotiated at the sole discretion of the Advisor. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian on a quarterly basis. The custodian will send a statement at least quarterly to the client. Where it

is not practical to directly deduct fees from the client account, clients will be sent an invoice on a quarterly basis for any outstanding advisory fees due, and the invoice is due upon receipt.

#### Fixed Fees

Alluvial will charge a fixed fee for comprehensive financial planning services of \$480 per plan as contracted for with the client in advance. Fixed fees may be negotiated at the discretion of the Advisor. Fixed fee-based clients are billed upon completion of work and delivery of the plan.

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For each of the Advisor's services described above, the Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without any payment of the Advisor's fee.

All fees paid to Alluvial for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses.

At no time will Alluvial accept or maintain custody of a client's funds or securities except for authorized fee deduction. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor's fee is separate and distinct from the custodian and execution fees.

Where acting in the capacity of an insurance agent, investment advisory representatives of Alluvial may effect insurance transactions for typical and customary compensation. Clients are not obligated to use investment advisor representatives of Alluvial to effect such insurance transactions.

This practice presents a conflict of interest by creating an incentive to recommend insurance products based on the compensation received, rather than on a client's needs. Alluvial manages this conflict by requiring the disclosure of all fees and commissions involved in insurance transactions to clients prior to entering into them. Investment advisors and investment advisor representatives are fiduciaries by law and are required to put the interests of clients before their own. Further, Alluvial maintains a code of ethics and a compliance program designed to prevent the firm and its personnel from violating securities laws.

Clients are not obligated to purchase insurance products from Alluvial investment advisor representatives and have the option to purchase the products through other insurance brokers or agents. In that case, the client would not receive the services provided by Alluvial which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives.

Alluvial does not earn more than 50% of its revenue from advisory clients from commissions from the sale of insurance products it recommends to clients.

Where Alluvial or its investment advisor representatives receive commissions from insurance product sales, there is no advisory fee associated with the insurance products.

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

Alluvial does not charge performance-based fees.

## **Item 7 Types of Clients**

The Advisor will offer its services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The Advisor does not have any minimum requirements for opening or maintaining an account.

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

The Advisor may utilize fundamental, technical or cyclical analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past.

The investment strategies the Advisor will implement may include long-term purchases of securities held at least for one year, short-term purchases for securities sold within a year, and trading of securities sold within 30 days.

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time

horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

In cyclical analysis, economic or business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. Also, the lengths of the economic cycles may be difficult to predict with accuracy. Therefore, the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

The primary risks in technical analysis are that the factors used to analyze the price, trends and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance on trends, technical analysis can signal buying at market peaks and selling at market troughs.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

#### Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.



The business risk in purchasing an annuity is that the financial strength of the insurance company issuing the annuity may decline and not be able to pay out the annuity obligation.

#### Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

#### Inflation Risk

Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

#### Interest Rate Risk

Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

#### Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products. It may also be the case with products that charge a penalty for early withdrawal or liquidation such as a certificate of deposit (CD).

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

### **Item 9 Disciplinary Information**

Neither Alluvial nor its management person(s) have had any legal or disciplinary events, currently or in the past.

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

Neither Alluvial nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Alluvial nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Alluvial does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, 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), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, lawyer or law firm, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Craig H. Field, President is also the owner of Ryan, Geer, Field & Rhodes PLLC (“RGFR”), a CPA firm that provides tax, accounting and business consulting services to individuals and businesses. RGFR is Mr. Field’s primary business and he spends the majority of his time in that activity. He is also licensed and registered as an insurance agent to sell life and health insurance, and conducts his insurance activities through various insurance companies licensed in the State of North Carolina. Therefore, he will be able to provide any tax and accounting services, and be able to purchase insurance products, for clients in need of such services. Where tax and accounting services are provided, or insurance products are sold, by Mr. Field, he will receive separate yet typical compensation in the form of fees for the tax and accounting services, and commissions for the purchase of insurance products. This creates a conflict of interest because of the receipt of additional compensation by Mr. Field. Clients are not obligated to use Mr. Field for the tax, accounting and insurance products services. However, in such instances, clients will enter into a separate agreement with RGFR for the tax and accounting services, and there is no advisory fee associated with the insurance products. Clients will be made aware of all fees and commissions associated with the services and products prior to the services being provided.

Alluvial does not recommend or select other investment advisers for clients.

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

Alluvial is a state registered investment advisor registered with the North Carolina securities regulators and has adopted as an industry best practice a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Alluvial deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Alluvial are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Alluvial collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed quarterly by the Chief Compliance Officer to identify and resolve conflicts of interest. Alluvial will provide a copy of the Code of Ethics to any client or prospective client upon request.

Alluvial and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Alluvial can take advantage of their advanced knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Alluvial has adopted a Code of Ethics as described above. Alluvial's Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Alluvial requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

### **Item 12 Brokerage Practices**

If requested by the client, Alluvial may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Alluvial will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

Alluvial may receive proprietary research services or other products as a result of recommending a particular broker which may result in the client paying higher commissions than those obtainable through other brokers. If Alluvial does receive such products or services, it will follow procedures which ensure compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

The firm seeks to obtain the most favorable net results for clients' price, execution quality, services and commissions. Although the firm seeks competitive commission rates, it may pay commissions on behalf of clients which may be higher than those available from other brokers in order to receive other services. The firm may enter into such transactions so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services provided by the broker. The services that may be considered in this determination of reasonableness may include (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto. Such research furnished by broker-dealers may be used to service any or all of Alluvial's clients and may be used in connection with accounts other than those that pay commissions to the broker-dealers providing the research. In particular, third-party research provided by broker-dealers may be used to benefit all of the firm's clients. This creates a conflict of interest in that the firm has an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the clients' interest in receiving the most favorable execution.

Benefits received may be used as soft dollars provided that:

- The service is primarily for the benefit of Alluvial's clients
- The commission rates are competitive with rates charged by comparable broker-dealers; and
- Alluvial does not guarantee a minimum amount of commissions to any broker-dealer.

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

Alluvial recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to Alluvial to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, Alluvial has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Alluvial's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Alluvial may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

Once the client provides the authority to place all transactions through the custodian they select, Alluvial does not permit clients to direct brokerage away from that custodian.

Alluvial may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of Alluvial's investment advisory agreements. Equity trades are blocked based upon fairness to clients, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based

on the allocation statement. Alluvial may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

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

Investment advisory client accounts are monitored on an ongoing basis and reviewed on a quarterly basis. Each quarterly review will result in a report that will include performance of the portfolio for the period and year to date, a summary and underlying detail of the asset allocation of the portfolio, and a cash flow analysis. Financial Plans once prepared and delivered to the client are not reviewed again unless the client requests a financial plan be updated. Client accounts are reviewed by Craig H. Field, President. The nature of the review is to determine if the client account is still in line with the client's stated objectives.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, trust companies or other custodians, insurance companies, broker-dealers and others who are involved with client accounts.

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

Alluvial is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Alluvial does not directly or indirectly compensate any person who is not a supervised person for client referrals.

### **Item 15 Custody**

Alluvial does not have custody of client funds or securities, except for the withdrawal of advisory fees directly from client accounts (please see Item 5 which describes the safeguards around direct fee deduction). However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

Alluvial will also provide account statements to clients. Clients are urged to compare the account statement they receive from the qualified custodian with those they receive from Alluvial. Any discrepancies should be immediately brought to the firm's attention.

### **Item 16 Investment Discretion**

Alluvial generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction.

However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Alluvial.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Alluvial will be in accordance with each client's investment objectives and goals.

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

Alluvial will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Alluvial cannot give any advice or take any action with respect to the voting of these proxies. The client and Alluvial agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

### **Item 18 Financial Information**

Alluvial does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, and is not required to file a balance sheet.

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

Alluvial has never been subject to a bankruptcy petition.

### **Item 19 Requirements for State-Registered Advisers**

Craig H. Field, CPA, ABV, President of Alluvial Wealth Management Inc. ("Alluvial"), was born in 1964. Mr. Field earned a Bachelor of Accounting degree in Accounting, Auditing and Tax from the University of Witwatersrand in Johannesburg, South Africa.

Mr. Field founded Alluvial in August 2019. Mr. Field is also the owner of RGFR Registered Agents LLC (since June 2021), Alluvial Financial Management LLC (since February 2018), Telar Information Technology Inc. (since March 2014), and a partner in Uptown Bean LLC (since May 2016). Mr. Field is also the owner of Ryan Geer Field & Rhodes, PLLC ("RGFR"), a tax preparation and accounting services company (since November 2020). In connection with providing services to RGFR firm clients, Mr. Field will take on a role within the RGFR client company to provide the CPA services. Currently, Mr. Field holds the following positions:

- Watercare Management Holdings Inc., CFO, since June 2023
- Watercare Innovations LLC, CFO, since June 2023
- Watercare Innovations US LLC, CFO, since December 2023
- Watercare Worldwide Holdings Inc., CFO, since December 2023

- Southern Environmental Solutions of the Carolinas, LLC, CFO, since January 2019
- Durbanville Real Estate Inc, Non-executive Director, since July 2016
- Aquila Trading, Inc., Non-executive Director, since April 2011
- J4A Investments Inc., Non-executive Director, since October 2016
- Namib Investments Inc., Non-executive Director, since September 2016
- Coral Island Investments, Inc., Non-executive Director, since April 2011
- B2B Solutions Group Inc., Non-executive Director, since January 2017
- Joining Hands USA, Non-executive Director, since October 2013
- Judea Harvest Inc., Non-executive Director, since April 2009
- Progressive Click Inc, Non-executive Director, since October 2015

Previously, Mr. Field was an Investment Advisor Representative at Taylor & Morgan Asset Management, LLC (April 2013 to December 2018), Manager at Mel Jackson Tax Service, Inc. (January 2011 to August 2013), Partner at Evolution Well Being LLC (February 2009 to June 2020), Secretary at Limestone Africa Investments LLC (May 2017 to May 2020), Non-Executive Director at Aircraft Parts New and Used, Inc. (August 2014 to June 2020), Non-Executive Director at Du Plessis Investments Inc. (June 2016 to March 2020), Non-Executive Director at Watercare Innovations LLC (January 2018 to January 2020), Non-Executive Director at Watercare Management Holdings Inc. (January 2018 to January 2020), Non-Executive Director at BMT Dimensions International Inc. (June 2011 to February 2019), Non-Executive Director at The Digital Coach Inc. (April 2016 to January 2020), Non-Executive Director at Elite Entrepreneurs Inc. (August 2016 to April 2020), Non-executive Director at Basson Group Investments Inc. (November 2016 to July 2021), Non-executive Director at Atlantic 2 Africa, Inc. (September 2014 to July 2021), Non-executive Director at Let's Prop USA Inc. (December 2018 to July 2021), Corporate Secretary at Digital marketing Services LLC (August 2017 to July 2021), Non-executive Director at Rookery Cloud Inc. (January 2019 to July 2021), Corporate Secretary at The Factory of Leads LLC (August 2017 to July 2021), and Non-executive Director at Shakti Malan Academy Inc. (July 2017 to July 2021).

Alluvial is not engaged in any other business other than giving investment advice and providing financial planning services.

Management of Alluvial have not been found liable in any arbitration, civil or disciplinary actions or administrative proceedings.

There are no material relationships maintained by Alluvial or its management persons with any issuers of securities other than those disclosed in Item 10.

**Item 1 Cover Page for Brochure Supplement  
Form ADV Part 2B**

Craig H. Field, CPA, ABV<sup>®</sup>, President

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704-927-1492

February 19, 2024

**This brochure supplement provides information about Craig H. Field, CPA, ABV<sup>®</sup> that supplements the Alluvial Wealth Management Inc. brochure. You should have received a copy of that brochure. Please contact Craig H. Field, CPA, ABV<sup>®</sup> if you did not receive Alluvial Wealth Management Inc. 's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Craig H. Field is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## **Item 2 Educational Background and Business Experience**

Craig H. Field, CPA, ABV<sup>®</sup>, President of Alluvial Wealth Management Inc. (“Alluvial”) was born in 1964. Mr. Field earned a Bachelor of Accounting degree in Accounting, Auditing and Tax from the University of Witwatersrand in Johannesburg, South Africa. Mr. Field became a Chartered Accountant in 1991 and obtained the CPA designation in 2015. Mr. Field also holds the Accredited in Business Valuation (ABV<sup>®</sup>) designation through the AICPA.

Mr. Field founded Alluvial in August 2019. Mr. Field is also the owner of RGFR Registered Agents LLC (since June 2021), Alluvial Financial Management LLC (since February 2018), Telar Information Technology Inc. (since March 2014), and a partner in Uptown Bean LLC (since May 2016). Mr. Field is also the owner of Ryan Geer Field & Rhodes, PLLC (“RGFR”), a tax preparation and accounting services company (since November 2020). In connection with providing services to RGFR firm clients, Mr. Field will take on a role within the RGFR client company to provide the CPA services. Currently, Mr. Field holds the following positions:

- Watercare Management Holdings Inc., CFO, since June 2023
- Watercare Innovations LLC, CFO, since June 2023
- Watercare Innovations US LLC, CFO, since December 2023
- Watercare Worldwide Holdings Inc., CFO, since December 2023
- Southern Environmental Solutions of the Carolinas, LLC, CFO, since January 2019
- Durbanville Real Estate Inc, Non-executive Director, since July 2016
- Aquila Trading, Inc., Non-executive Director, since April 2011
- J4A Investments Inc., Non-executive Director, since October 2016
- Namib Investments Inc., Non-executive Director, since September 2016
- Coral Island Investments, Inc., Non-executive Director, since April 2011
- B2B Solutions Group Inc., Non-executive Director, since January 2017
- Joining Hands USA, Non-executive Director, since October 2013
- Judea Harvest Inc., Non-executive Director, since April 2009
- Progressive Click Inc, Non-executive Director, since October 2015

Previously, Mr. Field was an Investment Advisor Representative at Taylor & Morgan Asset Management, LLC (April 2013 to December 2018), Manager at Mel Jackson Tax Service, Inc. (January 2011 to August 2013), Partner at Evolution Well Being LLC (February 2009 to June 2020), Secretary at Limestone Africa Investments LLC (May 2017 to May 2020), Non-Executive Director at Aircraft Parts New and Used, Inc. (August 2014 to June 2020), Non-Executive Director at Du Plessis Investments Inc. (June 2016 to March 2020), Non-Executive Director at Watercare Innovations LLC (January 2018 to January 2020), Non-Executive Director at Watercare Management Holdings Inc. (January 2018 to January 2020), Non-Executive Director at BMT Dimensions International Inc. (June 2011 to February 2019), Non-Executive Director at The Digital Coach Inc. (April 2016 to January 2020), Non-Executive Director at Elite Entrepreneurs Inc. (August 2016 to April 2020), Non-executive Director at Basson Group Investments Inc. (November 2016 to July 2021), Non-executive Director at Atlantic 2 Africa, Inc. (September 2014 to July 2021), Non-executive Director at Let’s Prop USA Inc. (December 2018 to July 2021), Corporate Secretary at Digital marketing Services LLC (August 2017 to July 2021), Non-executive Director at Rookery Cloud Inc. (January 2019 to July 2021), Corporate Secretary at The Factory

of Leads LLC (August 2017 to July 2021), and Non-executive Director at Shakti Malan Academy Inc. (July 2017 to July 2021).

Certified Public Accountants, or CPAs, are the only licensed accounting professionals in the United States. CPA licenses are issued by each of the state boards of accountancy.

Earning the designation as a CPA requires a combination of: educational experience, including 150 semester hours of college education that contains a balance of accounting, business and general education courses; meeting state determined minimum work experience requirements; and passing an examination consisting of four, four-hour sections, to demonstrate competence in the technical subject matter covering: auditing and attestation; business environment and concepts; financial accounting and reporting; and regulation. CPAs maintain their designation by taking 40 hours of continuing professional education annually.

The Accredited In Business Valuation (ABV<sup>®</sup>) designation is a professional designation awarded to Certified Public Accountants (CPAs) specializing in business valuation. The ABV<sup>®</sup> credential is granted exclusively by the AICPA to CPAs and qualified valuation professionals who demonstrate considerable expertise in valuation through their knowledge, skill, experience, and adherence to professional standards. CPAs seeking ABV<sup>®</sup> certification must meet educational and professional metrics before applying for the designation, and must pass a two-part, modular ABV<sup>®</sup> Exam. The exam requirement is waived for candidates who have passed the ASA credential exam of the American Society of Appraisers, CFA exam level III of the CFA Institute, or CBV credential exam of the Canadian Institute of Chartered Business Valuators. ABV<sup>®</sup> professionals must complete 60 hours of continuing professional education every three years to keep their designation.

### **Item 3 Disciplinary Information**

There are no legal or disciplinary events or proceedings to report concerning Mr. Field.

### **Item 4 Other Business Activities**

Craig H. Field, President is also the owner of Ryan, Geer, Field & Rhodes PLLC (“RGFR”), a CPA firm that provides tax, accounting and business consulting services to individuals and businesses. RGFR is Mr. Field’s primary business and he spends the majority of his time in that activity. He is also licensed and registered as an insurance agent to sell life and health insurance, and conducts his insurance activities through various insurance companies licensed in the State of North Carolina. Therefore, he will be able to provide any tax and accounting services, and be able to purchase insurance products, for clients in need of such services. Where tax and accounting services are provided, or insurance products are sold, by Mr. Field, he will receive separate yet typical compensation in the form of fees for the tax and accounting services, and commissions for the purchase of insurance products. This creates a conflict of interest because of the receipt of additional compensation by Mr. Field. Clients are not obligated to use Mr. Field for the tax, accounting and insurance products services. However, in such instances, clients will enter into a separate agreement with RGFR for the tax and accounting services, and there is no advisory fee associated with the insurance products. Clients will be made aware of all fees and commissions associated with the services and products prior to the services being provided.

Mr. Field is also the Chief Financial Officer for various companies in the WaterCare Group, namely WaterCare Management Holdings Inc., WaterCare Innovations LLC, WaterCare Innovations US LLC, and WaterCare Worldwide Holdings Inc. WaterCare is a water treatment company based in Ponte Vedra Beach, Florida and is wholly owned by Watercare Management Holdings Inc. Mr. Field does not intend to recommend that clients enter into transactions with or invest in any of the companies in the WaterCare Group, and therefore there is no conflict of interest. However, Mr. Field will earn a substantial portion of his annual income in his capacity as Chief Financial Officer of the WaterCare Group.

#### **Item 5 Additional Compensation**

Mr. Field does not receive compensation or other economic benefit from anyone who is not a client for providing advisory services.

#### **Item 6 Supervision**

Craig H. Field is the President and Chief Compliance Officer of Alluvial and can be reached at 704-927-1492. Mr. Field is the only individual that provides investment advice to clients. As a single person firm, Mr. Field cannot be supervised, but is a fiduciary by law and is required to act in the best interests of clients.

#### **Item 7 Requirements for State-Registered Advisers**

Mr. Field has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.