

Item 1 Cover Page

Bunker Wealth Management LLC

Part 2A of Form ADV: Firm Brochure

1900 Camden Avenue

San Jose, CA 95124

(408) 558-3600

May 21, 2021

This brochure provides information about the qualifications and business practices of Bunker Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (408)558-3600. 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. Our firm's CRD number is 311285. Bunker Wealth Management LLC is a state registered investment advisor. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

This is the firm's initial brochure. As such, there are no changes from any prior filing.

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Item 4 Advisory Business

Bunker Wealth Management LLC (“BWM LLC”) is a state-registered investment advisor with its principal place of business located in San Jose, California. BWM LLC provides investment management services to individuals, families and businesses. BWM LLC’s principal shareholders are listed below:

- Evan Reeves Alonzo
- Gregg Bunker

Please Note: *Gregg Bunker is a shareholder of BWM LLC but is not an Investment Advisor Representative.*

Types of Services

This Disclosure Brochure describes the business of BWM LLC. Certain sections will also describe the activities of Supervised Persons. Supervised Persons are any of BWM LLC’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on BWM LLC’s behalf and is subject to the firm’s supervision or control.

Portfolio Management Services

BWM LLC provides clients with portfolio management services, which may include the discretionary or non-discretionary management of brokerage accounts. BWM LLC does not participate in a wrap fee program at this time. Additionally, as this is our initial brochure, we do not currently manage client assets on a discretionary or non-discretionary basis at this time.

BWM LLC may invest client assets in individual debt and equity securities, exchange traded funds, mutual funds, certificates of deposit as well as other securities depending on the needs of the client.

BWM LLC tailors its advisory services to the individual needs of the client, consulting with clients on an ongoing basis to determine risk tolerance, time horizon and other factors that may impact the clients’ investment needs. BWM LLC ensures that clients’ investments are suitable for their particular needs, goals, objectives and risk tolerance.

Clients are advised to promptly notify BWM LLC if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon BWM LLC’s management services. Clients may impose reasonable restrictions or mandates on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in BWM LLC’s sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

Financial Planning Services and Consulting

It is important to us that our clients can converse with us about their financial situations on an ongoing basis. Should a client want us to assist in helping them discuss financial planning for the future we want to be able to fully engage them and find meaningful solutions. In the course of this discussion we may review client goals, needs, wants, insurance needs, retirement issues, trust and estate services, cash flow planning, tax issues and many other financial planning topics. In the natural discussion of one’s financial situation and the investment advisor being in a position to provide advice, there may be a potential

conflict of interest between the interest of the investment advisor and the interest of the client. In these situations, we must provide a written statement highlighting this conflict may exist. This written statement will include but not limited to the existence of a conflict of interest between the interest of the investment advisor and the interest of the client, the client is under no obligation to act upon the investment adviser’s recommendation and if the client elects to act on any recommendation, the client is under no obligation to execute the transaction through the investment adviser.

Educational Seminars and Workshops

Giving back to our community is an important role that we want to continue to develop. Thus, if there is an opportunity for us to speak on a topic of importance, we would be open to entertaining such an opportunity. Additionally, if we can provide or participate in hands on skill builder to help people better their own financial education/situations we would also be open to entertain this opportunity. We currently do not charge for these types of goodwill services.

Item 5 Fees and Compensation

Portfolio Management Fee

BWM LLC provides portfolio management services for an annual fee based upon a fixed percentage of client Assets Under Management (“AUM”). BWM LLC’s annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which are incurred by the client. BWM LLC does not, however, receive any portion of such commissions, fees, and costs.

BWM LLC’s Fee Schedule is outlined below, and is a straight tier schedule:

Fee Schedule:

Assets Under Management	Annualized Fee
Less Than 100,000	2.00%
100,000 – 249,999	1.75%
250,000 – 499,999	1.50%
500,000 - 749,999	1.25%
750,000 – 999,999	1.00%
1,000,000 – 4,999,999	0.75%
Greater Than 5,000,000	0.50%

Clients must pay BWM LLC’s fees in advance. BWM LLC’s annual fee is prorated and charged quarterly, in advance, based upon the market value of the AUM by BWM LLC on the last day of the previous quarter. The annualized fee varies between 0.50-2.00%, depending upon the market value of the assets under management and the type of wealth management services to be rendered. Fees are deducted from the clients’ account directly unless otherwise requested. Please refer to direct billing information below.

If the advisory contract is terminated before the end of the billing period, any unearned fees resulting from the pre-paid advance fee will be refunded, pro-rata based upon the amount of days left in the quarter,

starting with the day after Client gives notice to BWM LLC of Client's intent to terminate the relationship. Clients may terminate advisory services upon written notice delivered to and received by BWM LLC. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of BWM LLC's receipt of client's written notice. Any earned but unpaid fees are immediately due and payable.

BWM LLC, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, etc.). Additionally, given the competitive nature of our industry, lower fees for comparable services may be available from other sources.

BWM LLC does not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Direct Billing of Advisory Fees

Clients may request that fees be deducted directly from their account. In instances where a client has authorized direct billing, BWM LLC takes steps to assure that our custodian sends monthly or quarterly account statements showing all transactions in the account, including fees paid to BWM LLC, directly to the client. BWM LLC may invoice clients for their advisory fees whether direct billing is used or not. Clients may have the option to be billed by invoice rather than having fees deducted from their account.

Financial Planning Fees

Comprehensive Financial Planning

Comprehensive Financial Planning consists of an upfront charge of \$499 to \$10,000 and an ongoing fee that is paid monthly, quarterly, or annually, in advance, at the rate of \$99 to \$999 per month to assist you the plan's execution and monitor your progress. The fee may be negotiable in certain cases. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

Financial Planning Fee

Financial Planning will generally be offered on a fixed fee basis. In special circumstances, it may be offered on an hourly basis at a rate of \$100 to \$350 per hour, depending on the nature of the specified services. Fixed fees will be determined on a case-by-case basis with the fee based on the complexity of the situation and the needs of the client. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$250 - \$10,000. The fee is negotiable. If a fixed fee program is chosen, half of the fee is due at the beginning of process and the remainder is due at completion of work, however, BWM LLC will not bill an amount above \$500 more than 6 months in advance.

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

BWM LLC does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains or on capital appreciation of the assets of a client.

Item 7 Types of Clients

BWM LLC generally provides its services to individuals, trusts, estates, pensions, family limited partnerships, and retirement accounts.

Minimum Account Size and Minimum Fee

BWM LLC's minimum account size is \$100,000 (exceptions considered on a case-by-case basis) and there is no minimum annual fee.

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

Investment Strategies and Methods of Analysis

BWM LLC consults with clients initially and on an ongoing basis to determine risk tolerance, time horizon and other factors that impact the clients' investment needs. BWM LLC then designs a plan based on these needs which is focused on helping clients achieve their investment goals. The firm utilizes analytical tools, research software, and traditional and alternative manager databases to provide clients with sound investment strategies.

The firm may utilize, among other methods, fundamental analysis of the fiscal and competitive position of a company or fund. BWM LLC will analyze the financial condition, capabilities of management, fees, performance, new products and services, as well as the company's market situation amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that market conditions may negatively impact the security regardless of the overall health and position of a company.

Risks of Loss

Investing in securities involves risk of loss. Clients should fully understand the nature of the contractual relationship into which they are entering and the extent of their exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

General Investment Risk: All investments come with the risk of loss. Investing may involve substantial risks, including complete loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments BWM LLC invests in.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance is no guarantee of future results. The value of investments and the income derived may rise or fall and investors may not recoup the original amount invested. Investments may also be

affected by any changes in exchange control, regulations, tax laws, withholding taxes, international political and economic developments, and government economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Market Risks

The profitability of BWM LLC's recommendations may depend to a great extent upon correctly assessing the future course of price movements or other measurements such as enterprise value of stocks and bonds. There can be no assurance that BWM LLC will be able to predict those price movements or other measurements accurately.

Item 9 Disciplinary Information

BWM LLC is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. BWM LLC does not have any required disclosures to this Item.

Item 10 Other Financial Industry Activities and Affiliations

Neither BWM LLC, nor any of its representatives, have signatory authority over any client accounts.

BWM LLC is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons.

At this time, we have no management persons that are registered, or have an application pending to register, as a broker-dealer or a registered broker-dealer representative. Nor do we have any management persons registered or have an application to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities. We do not recommend or select other investment advisers for our clients and receive compensation directly or indirectly from those advisers that create a material conflict of interest. Additionally, we do not have any other business relationships with those advisers that create a material conflict of interest.

Evan Reeves Alonzo is a Certified Public Accountant and Attorney. Evan provides accounting services as an employee of the Alex Alonzo Accountancy Corporation, and provides tax law services as an independent contractor of The Law Office of David S. Howard.

The receipt of dual compensation creates a conflict of interest. This conflict is mitigated by BWM LLC's code of ethics, which requires all affiliated members to place the interests of clients first. There is no obligation on any client of BWM LLC to use any other services provided by Evan Reeves Alonzo, via their respective other business ventures, nor are any clients of any other related entities required to invest with BWM LLC.

All of these facts are disclosed to clients during the initial client consultation. Upon executing an advisory agreement, clients are required to explicitly acknowledge their understanding that Evan Reeves Alonzo provides services for other entities outside of BWM LLC, and while advice of a tax or legal nature may be sought and provided, it is incidental to and separate from the advisory relationship.

Item 11 Code of Ethics

BWM LLC commits to ethical behavior in regards to our business practice and client interaction. Our code of ethics states that BWM LLC have the following responsibilities to their clients. BWM LLC must:

- Act professionally and ethically at all times;
- Act for the benefit of clients;
- Act independently, objectively, skillfully and with competency;
- Communicate with clients on a timely manner; and
- Uphold the rules of capital markets.

At BWM LLC we pride ourselves in recommending securities to clients that we may have a material financial interest ourselves. We have adopted the following guidelines to ensure client prioritization and avoid conflicts of interest. Should a conflict of interest arise we will put the interest of the client first.

BWM LLC and may invest, and hold a material financial interest, in the same securities which are also recommended to clients. BWM LLC requires priority to investments made on behalf of the client over those that benefit our own interests. BWM LLC prohibits any employee from trading a security before a client and prohibits an advisor from opening and having a personal securities trading account without prior written approval from BWM LLC.

BWM LLC may buy or sell investments which are also recommended to clients. BWM LLC requires priority to investments made on behalf of the client over those that benefit our own interests. BWM LLC prohibits any employee from trading a security before a client and prohibits an advisor from opening and having a personal securities trading account without prior written approval from BWM LLC.

BWM LLC may recommend securities, or buy or sell investments, which are also recommended to clients, at, or about the same time as transactions for client accounts are made. However, transactions for client accounts are always prioritized in trade order and execution before BWM LLC and/or BWM LLC employee accounts. BWM LLC code requires priority to investments made on behalf of the client over those that benefit our own interests.

A copy of the above code of ethics may be provided to a client upon request.

Item 12 Brokerage Practices

BWM LLC recommends, and uses, E*Trade Financial as a broker dealer. BWM LLC may utilize various broker dealers' custodians based on the benefit provided to clients. BWM LLC may continue to evaluate firms offering custody, brokerage, and investment platform services and judge best fit for BWM LLC clients. Significant factors considered in the selection include but not limited to:

- Financial stability - The company that will custody client assets and as such strength, security, safety and stability are paramount in the decision-making process;
- Suite of services offered to our clients and the management platform offered for the effective and efficient management of client accounts;
- Technology solutions and standards;
- Client cost and best execution; and
- Customer Service.

Any soft-dollar benefit that could arise in the future as a result of BWM LLC relationship with its selected broker-dealer would be required to benefit the client. We unaware of any soft dollar conflicts at this time.

BWM LLC does not receive referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

BWM LLC does not routinely recommend, request or require that a client direct BWM LLC to execute transactions through a specified broker-dealer. Not all advisors require their clients to direct brokerage.

Aggregation of Trades

Occasions may arise where portfolio transactions may be executed as part of similar and concurrent authorizations to purchase or sell the same security for numerous accounts with similar investment objectives.

When such concurrent authorizations occur and when we have the ability to aggregate trades, the objective is to allocate the execution(s) in a manner that is deemed equitable to the accounts involved.

In any given situation, we attempt to aggregate and allocate trade executions in the most equitable manner possible.

Item 13 Review of Accounts

Account Reviews

BWM LLC monitors its clients' investment management portfolios as part of an ongoing process while regular account reviews are conducted on an annual basis. Where BWM LLC provides solely advisory and/or consulting services, reviews are conducted on an "as needed" basis. Such reviews are conducted by Member of BWM LLC. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with the firm and to keep BWM LLC informed of any changes thereto. The firm contacts ongoing investment advisory clients at least annually to review its previous services and recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and General Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for their accounts. Clients may also receive reports from BWM LLC that includes relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis or as otherwise agreed upon with the client. Clients should compare the account statements they receive from their custodian with any supplemental reports they receive from BWM LLC and/or the independent managers.

Item 14 Client Referrals and Other Compensation

BWM LLC is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, BWM LLC is required to disclose any direct or indirect compensation that it provides for client referrals. BWM LLC does not have any required disclosures to this Item.

BWM LLC does not have any formal relationship or arrangement requiring disclosures to for this Item, however the firm may occasionally refer clients to members of the community such as lawyers and accountants who have made, or may make, referrals to the firm. Consequently, there may be the potential for a conflict of interest where BWM LLC makes such referrals.

Item 15 Custody

BWM LLC provides investment advisory services and outsources custody of client assets to a qualified custodian. Due to the allowance of direct billing (Item 5) of client accounts for the purpose of collecting fees, we must adhere to certain safeguards to avoid having custody of client assets.

These safeguards include that BWM LLC has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay for fees. BWM LLC have also confirmed in writing authorization from the client to collect fees directly from accounts held at the qualified custodian.

It is our policy that each time a fee is directly deducted from a client a client account BWM LLC concurrently sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account and send the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

In addition, as discussed in Item 13, BWM LLC also sends periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from BWM LLC as they may include information related to fees.

Item 16 Investment Discretion

BWM LLC may be given the authority to exercise discretion on behalf of clients. BWM LLC is considered to exercise investment discretion over a client's account if it can affect transactions for the client without first having to seek the client's consent. BWM LLC is given this authority through a

power-of-attorney included in the agreement between BWM LLC and the client and must be secured before and non-discretionary portfolio services are provided. Clients may request a limitation on this authority (such as certain securities not to be bought or sold).

BWM LLC may take discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made
- Any other powers provided to BWM LLC as confirmed by the client

BWM LLC does have discretion in regards to determining the broker or dealer to be used for a purchase or sale of securities for a clients account.

BWM LLC provides non-discretionary investment management services where the client confirms final trading and investment direction. Confirmation of non-discretionary transactions must be secured from the client prior to BWM LLC facilitating such a transaction.

Item 17 Voting Client Securities

BWM LLC is required to disclose if it accepts authority to vote client securities.

BWM LLC may vote clients' securities (i.e., proxies) on their behalves. When BWM LLC accepts such responsibility, it will only cast proxy votes in a manner consistent with the best interest of its clients. Absent special circumstances, proxies will generally be voted in line with company management, as the Firm believes these individuals are more appropriately suited to make decisions that impact the issuer. In situations where there may be a material conflict of interest in the voting of proxies due to business or personal relationships that BWM LLC maintains with persons having an interest in the outcome of certain votes, BWM LLC takes appropriate steps to ensure that its proxy voting decisions are made in the best interest of its clients and are not the product of such conflict. Clients may contact BWM LLC to direct their vote in a particular solicitation, to request information about how the Firm voted proxies for that client's securities or to get a copy of BWM LLC's proxy voting policies and procedures

Item 18 Financial Information

BWM LLC is not required to disclose any financial information pursuant to this Item due to the following:

- The firm does not require or solicit the prepayment of more than \$500 in fees six months or more in advance;
- The firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Investment Advisors

We are registering or are registered with one or more state securities authorities; as such we provide these additional disclosures for our management persons.

A. Identify each of your principal executive officers and *management persons*, and describe their formal education and business background. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

B. Describe any business in which you are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

C. In addition to the description of your fees in response to Item 5 of Part 2A, if you or a *supervised person* are compensated for advisory services with *performance-based fees*, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the *client*.

D. If you or a *management person* has been *involved* in one of the events listed below, disclose all material facts regarding the event.

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
 1. (a) an investment or an *investment-related* business or activity;
 2. (b) fraud, false statement(s), or omissions;
 3. (c) theft, embezzlement, or other wrongful taking of property;
 4. (d) bribery, forgery, counterfeiting, or extortion; or
 5. (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative

proceeding involving any of the following:

1. (a) an investment or an *investment-related* business or activity;
2. (b) fraud, false statement(s), or omissions;
3. (c) theft, embezzlement, or other wrongful taking of property;
4. (d) bribery, forgery, counterfeiting, or extortion; or
5. (e) dishonest, unfair, or unethical practices.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your *management persons* have with any issuer of securities that is not listed in Item 10.C. of Part 2A

Evan Reeves Alonzo

- A. Please see ADV Part 2B for information pertaining to formal education and business background.
- B. Please see ADV Part 2B for information pertaining to other actively engaged business.
- C. There is no compensation related to advisory services with performance-based fees.
- D. No disclosure(s) events to report.
- E. No relationship with any securities issuers to disclose.

Fair, Equitable or Ethical Principals

We strive to provide unbiased investment advisory services and failing to disclose to a client, before entering or renewing an advisory agreement with that client, any material conflicts of interest regarding the investment adviser, its representatives or any of its employees, which may impair the rendering of unbiased and objective advice does not promote “fair, equitable or ethical principles”. To this extent we strive to provide disclosure all material conflicts of interest prior to entering into an agreement with BWM LLC.

Business Continuity Plan

Securities industry regulations require that investment advisory firms inform their clients of their plans to address the possibility of a business disruption that potentially results from power outages, natural disasters, or other events.

BWM LLC has chosen to work with qualified custodians where its systems are primarily internet based in order to protect against the impact of any potential business disruption. If any of BWM LLC physical office space were temporarily unavailable, BWM LLC employees maintain the capability to complete client critical services anywhere with an internet connection, including their homes or remote workspaces.

In the case of the incapacitation or death of any critical BWM LLC employee(s), BWM LLC will continue to meet its existing fiduciary responsibilities to clients by the remaining managing persons or to promptly terminate its client relationships with proper notification should it no longer be able to do so.

Bunker Wealth Management LLC

Part 2B of Form ADV: Brochure Supplement

Professional Background and Education of:

Evan Reeves Alonzo

1900 Camden Avenue

San Jose, CA 95124

(408) 558-3600

May 21, 2021

This brochure supplement provides information about Evan Reeves Alonzo and supplements the Bunker Wealth Management LLC Firm Brochure. You should have received a copy of that brochure. Please contact the firm at telephone number (408) 558-3600 if you did not receive a copy of ADV Part 2A Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Evan Reeves Alonzo is available on the SEC's website at www.adviserinfo.sec.gov.

Evan Reeves Alonzo (CRD# 5158125)

Item 2 Educational Background and Business Experience

Born 1983

Education

B.S., Business – Concentration in Accounting, San Jose State University, 2006

J.D., New York University, 2014

Business Background

2006 – 2007 -- Registered Representative, Laguna Financial Corporation

2006 – 2007 -- Accountant, Alex Alonzo Accountancy Corporation

2007 – 2010 -- Audit Senior, Deloitte & Touche LLP

2010 – 2011 -- Audit Professional, The Siegfried Group, LLP

2012 -- Legal Intern, New York State Homes & Community Renewal

2013 -- Summer Law Clerk, Brown Rudnick LLP

2014 – 2015 -- Commercial Litigation Associate, Brown Rudnick LLP

2015 – Present -- Associate, Alex Alonzo Accountancy Corporation

2016 – Present -- Of Counsel, Law Office of David S. Howard

Item 3 Disciplinary Information

Mr. Alonzo has no disciplinary history to disclose.

Item 4 Other Business Activities

Attorney at Law – California Bar # 314077, admitted 2017; New York Bar # 5338371, admitted 2015

Certified Public Accountant – California License # 110155, issued 2010

Due to services provided by our business affiliates there may be times when the receipt of dual compensation may create a conflict of interest. This conflict is mitigated by BWM LLC's code of ethics, which requires all affiliated members to place the interests of clients first. There is no obligation on any

client of BWM LLC to use any tax or legal services provided by Evan Reeves Alonzo, nor are any of Evan's clients required to invest with BWM LLC. Additionally, to safeguard against having custody of client assets, Evan does not have signatory authority for client's accounts.

Item 5 Additional Compensation

Evan Reeves Alonzo is a fulltime salaried employee of the Alex Alonzo Accountancy Corporation. Evan is also Of Counsel, as an independent contractor, to the Law Office of David S. Howard and is compensated on an hourly basis for time billed.

Mr. Alonzo does not receive any compensation for providing advisory services other than what is disclosed on Form ADV Part 2A.

Item 6 Supervision

All Firm personnel are bound by our Firm's Code of Ethics, which holds them to the highest ethical standards.

Item 7 Requirements for State-Registered Advisers

Mr. Alonzo has not been involved in/with, or been accused nor found liable for any of the following:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
3. Subject to bankruptcy petition