

**Part 2A of Form ADV: Firm Brochure**

**Item 1 Cover Page**

A)

Advisor name: TreeTop Wealth Management, LLC

Address: One Northfield Plaza, Suite 106

Northfield, IL 60093

Contact Information: Phone number: 847-386-6707

E-mail address: [info@treetopwm.com](mailto:info@treetopwm.com)

Web address: [www.treetopwm.com](http://www.treetopwm.com)

Date of Brochure: January 6, 2015

B) Required Statements

This brochure provides information about the qualifications and business practices of TreeTop Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 847-386-6707.

C) RIA Disclaimer Statement

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

## Item 2 Material Changes

### Item 3 Table of Contents

Item	Page
1	<b>Cover page</b> .....1
2	<b>Material changes</b> .....2
3	<b>Table of contents</b> .....3
4	<b>Advisory business</b> (A. Description of Advisory Firm, Description of Advisory Services offered, C. Client Tailored Services and Client Services Offered, D. Wrap Fee Programs, E. Client Assets Under Management).....4
5	<b>Fees and compensation</b> (A. Method of Compensation and Fee Schedule, B. Client Payment of Fees, C. Additional Client Fees Charged, D. Prepayment of Client Fees, E. External Compensation For the Sale of Securities to Clients).....6
6	<b>Performance-Based Fees and Side-by-Side Management</b> .....7
7	<b>Types of clients</b> .....8
8	<b>Methods of Analysis, Investment Strategies and Risk of Loss</b> (A. Methods of Analysis and Investment Strategies, B. Investment Strategy and Method of Analysis Material Risks, C. Security Specific Material Risks).....8
9	<b>Disciplinary Information</b> (A. Criminal or Civil Actions, B. Administrative Enforcement Proceedings, C. Self-Regulatory Organization Enforcement Proceedings).....9
10	<b>Other Financial Industry Activities and Affiliations</b> (A. Broker-Dealer or Representative Registration, B. Futures or Commodity Registration, C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest, D. Recommendation or Selection of other Investment Advisors and Conflicts of Interest).....9
11	<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> (A. Code of Ethics Description, B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest, C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest, D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest).....10
12	<b>Brokerage Practices</b> (A. Factors Used to Select Broker-Dealers for Client Transactions, B. Aggregating Securities Transactions for Client Accounts).....11
13	<b>Review of Accounts</b> (A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons involved, B. Review of Client Accounts on Non-periodic Basis, C. Content of Client Provided Reports and Frequency).....12
14	<b>Client Referrals and Other Compensation</b> (A. Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest, B. Advisory Firm Payments for Client Referrals).....13
15	<b>Custody</b> .....13
16	<b>Investment Discretion</b> .....13
17	<b>Voting Client Securities</b> .....13
18	<b>Financial Information</b> (A. Balance Sheet, B. Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients, C. Bankruptcy Petitions During the Past Ten Years).....14
19	<b>Requirements for State-registered Advisors</b> A. Principal Executive Officers and Management Persons B. Other Business Activities Engaged in, C. Performance Based Fee Description, Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons, E. Material Relationships Maintained by this Advisory Business or Management Persons With Issuers of Securities.....15

## **Item 4 Advisory Business**

### **A. Description of Advisory Firm**

TreeTop Wealth Management, LLC was formed on 10/01/2010.

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman are the managing principals/ owners of TreeTop Wealth Management, LLC.

TreeTop Wealth Management, LLC is a Northfield, Illinois based investment advisory firm providing wealth management services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities as well as solicitation of investment advisory services.

### **B. Description of Advisory Services Offered**

TreeTop Wealth Management, LLC offers wealth management on a fee basis for individuals and/or small business. Portfolio management for businesses and institutional clients. In our initial meeting with prospective clients: 1. We establish and define the client/ advisor relationship. 2. Gathering client data and goals. 3. Analyzing client data. 4. Developing and presenting our recommendations. 5) Implementing the recommendations. 6) Monitoring the clients' accounts, quarterly reviews. Clients may engage with TreeTop Wealth Management at any time, with any questions. Minimum investment is \$250,000.

A comprehensive financial plan is based on the client's specific situation, financial goals and objectives. It may include retirement planning, investment planning, asset allocation recommendations, estate planning, insurance planning, and tax planning.

Discretionary money management is based on the client's specific situation, financial goals, objectives, risk and time.

TreeTop Wealth Management, LLC philosophy focuses on 3 main principles: risk management, comprehensive client understanding, and delivery of unrivaled customer service. TreeTop focuses on portfolio management tailored to reduce risk in clients' portfolio. With no proprietary products on offer which might cloud the choice of investments, TreeTop takes an independent approach to tactical asset allocations and diversification. Independence allows TreeTop to take advantage of a broader scope of investment vehicles. We understand each client has a unique situation and requires a customized plan. TreeTop will use actively managed mutual funds, exchanged traded funds, bonds and alternative investments to custom build portfolios for clients. TreeTop strives to leave each client feeling like they are the most valued relationship. In the Financial Services industry performance does not stand alone, at TreeTop our clients receive accurate, timely, and personalized customer service.

TreeTop Wealth Management, LLC offers our discretionary money management services to all clients. The annual fee shall vary (between 0.50% and 1.00%) depending upon the level and scope of the services and the professional rendering the wealth management services.

**Retirement planning** - This involves advice with respect to alternatives and techniques for accumulating wealth for retirement income or advice relative to appropriate distribution of assets following retirement. Retirement assets are evaluated and, where appropriate, recommendations are provided.

**Investment Planning/Asset Allocation/Fund Choice** - This involves advice with respect to asset allocation and investment income accumulation techniques. Evaluations are made of existing and, when applicable, potential investments in terms of their economic and tax characteristics as well as their suitability for meeting client's objectives. Tax consequences and their implications are identified and evaluated in general terms

**Estate Planning** - This service generally involves a review of assets and liabilities, the titling of assets and the consideration of trusts. However, the firm may provide advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques as well as a discussion of gifts, trusts, etc., and the disposition of business interests. Tax consequences and their implications are identified and evaluated in general terms. The client's chosen licensed attorney must be used for evaluation and documentation creation.

**Insurance Planning** - This includes risk management associated with advisory recommendations based on the combination of insurance types that best meet a client's specific needs, e.g. life, health, disability, home, auto, and long-term care.

**College Planning** - This includes alternatives and strategies with respect to the complete or partial funding of college.

**Tax Planning** - This includes advice as to how tax laws may effect various financial decisions, e.g. acquisitions, pension strategy, investing in new opportunities or consolidation of existing investments, and individual taxation issues, among others. Tax preparation and filing is referred to the client's chosen personal tax advisor.

**C. Client Tailored Services**

TreeTop Wealth Management, LLC first conducts initial interviews and data gathering to determine the client's individual needs, goals, time horizons and risk tolerance. The advisers will then prepare analyses of the financial data and present summary to client. TreeTop Wealth Management, LLC will implement and monitor plan. Periodic financial check-ups will be conducted to make sure plan is on track and to see if there are any changes in client's situation. If clients do not want TreeTop Wealth Management, LLC to invest in a certain security or type of security, we take their request into consideration.

**D. Wrap Fee Programs**

TreeTop Wealth Management, LLC does not offer wrap fee programs.

**E. Client Assets Under Management**

TreeTop Wealth Management, LLC manages assets on a discretionary basis.

**Item 5 Fees and Compensation**

**A. Method of Compensation and Fee Schedule**

TreeTop Wealth Management, LLC annual fee shall be prorated and charged quarterly, in arrears, based upon the average market value of the assets during the previous quarter. The annual fee shall vary (between 0.50% and 1.00%) depending upon the level and scope of the services and the professional rendering the wealth management services, as follows:

**PORTFOLIO VALUE ANNUAL FEE**

First \$1,000,000 .....	1.00%
Next \$2,000,000 .....	0.80%
Next \$2,000,000 .....	0.65%
above \$5,000,000 .....	negotiable

TreeTop Wealth Management, LLC may also provide services to *qualified clients* for a performance-based fee in accordance with the requirements set forth in applicable laws, rules, and regulations. For those clients, TreeTop Wealth Management, LLC shall charge its fees based upon a percentage of the market value of the assets being managed by TreeTop Wealth Management, LLC (“*base fee*”) in addition to a fee based on the performance of the account (“*performance fee*”).

TreeTop Wealth Management shall charge a *performance fee* of ten percent (10%) of the net performance subject to a high water mark. TreeTop Wealth Management will also charge a *base fee* which shall vary (between 0.25% and 0.50%) depending upon the market value of the assets under management and the type of investment management services to be rendered, as follows:

**PORTFOLIO VALUE BASE FEE**

First \$5,000,000 .....	0.50%
Next \$5,000,000 .....	0.40%
above \$10,000,000 .....	0.25%

TreeTop Wealth Management, LLC annual *base fee* shall be prorated and charged quarterly, in arrears, based upon the average market value of the assets during the previous quarter. The Registrant’s *performance fee* shall be charged annually, in arrears, based on the net gains of the client’s portfolio at the end of the calendar period. Insurance Products (life insurance, fixed annuities, fixed income annuities) if TreeTop Wealth Management, LLC receives a commission through the dealer no fee is charged to the individual. Pursuant to Section 130.846 of the Rules “an advisory client has a right to terminate the contract without penalty within five (5) business days after entering into the contract.”

**B. Client Payment of Fees**

Management fees are charged on quarterly basis in arrears. Management fees are deducted from client accounts or can be paid directly to TreeTop Wealth Management, LLC.

**C. Additional Client Fees Charged**

All fees paid to TreeTop Wealth Management, LLC are separate from the fees and expenses charged to shareholders of mutual fund shares by mutual funds, or by the investment advisor managing the portfolios. A complete explanation of these fees and expenses are provided in each mutual fund prospectus. Clients are encouraged to read the fund prospectus carefully before investing. Clients may also pay transaction fees to the broker/dealers and applicable fees to other service providers, such as for trust services.

**D. Prepayment of Client Fees**

TreeTop Wealth Management, LLC does not collect prepayment fees. Client/ advisor relationship can be terminated at any time. Should the relationship be terminated, the advisory fee will be calculated and prorated up to the termination date.

**E. External Compensation For the Sale of Securities to Clients**

TreeTop Wealth Management, LLC does not receive external compensation for the sale of securities.

Certain of the Registrant’s *Advisory Affiliates*, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. While the Registrant does not sell such insurance products to its investment advisory clients, the Registrant does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that the Registrant recommends the purchase of insurance products where the Registrant’s *Advisory Affiliates* receive insurance commissions or other additional compensation. The Registrant’s *Advisory Affiliates* currently devote approximately ten percent (10%) of their time to insurance sales.

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

TreeTop Wealth Management, LLC may also provide services to *qualified clients* for a performance-based fee in accordance with the requirements set forth in applicable laws, rules, and regulations. For those clients, TreeTop Wealth Management, LLC shall charge its fees based upon a percentage of the market value of the assets being managed by TreeTop Wealth Management, LLC (“*base fee*”) in addition to a fee based on the performance of the account (“*performance fee*”).

TreeTop Wealth Management shall charge a *performance fee* of ten percent (10%) of the net performance subject to a high water mark. TreeTop Wealth Management will also charge a *base fee* which shall vary (between 0.25% and 0.50%) depending upon the market value of the assets under management and the type of investment management services to be rendered, as follows:

### PORTFOLIO VALUE BASE FEE

First \$5,000,000 .....	0.50%
Next \$5,000,000 .....	0.40%
above \$10,000,000 .....	0.25%

TreeTop Wealth Management, LLC annual *base fee* shall be prorated and charged quarterly, in arrears, based upon the average market value of the assets during the previous quarter. The Registrant’s *performance fee* shall be charged annually, in arrears, based on the net gains of the client’s portfolio at the end of the calendar period.

**Performance based-fee can only be offered to “qualified clients”. The definition of “qualified Clients” can be found in SEC Section 205-3. Please amend Schedule F of Form ADV to include the below definition of a “qualified client as set forth in SEC Section 205-3.**

“Qualified Client” pursuant to SEC Section 205-3 means:

(i) A natural person who or a company that immediately after entering into the contract has at least \$750,000 under the management of the investment adviser;

(ii) A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:

(A) Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$1,500,000, at the time the contract is entered into; or

(B) Is a qualified purchases as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into; or

(iii) A natural person who immediately prior to entering into the contract is:

(A) An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or

(B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.

Conflict of Interest- Under this fee arrangement, there is the potential for a conflict of interest in that the *performance fee* may be an incentive for the Registrant to make investments that are riskier or more speculative in than would be the case absent a *performance fee* arrangement. TreeTop Wealth Management, LLC avoids conflict of interest by keeping to our fiduciary responsibility to our client.

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

TreeTop Wealth Management, LLC generally provides advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Minimum to open an account is \$250,000. Minimum can be waived by TreeTop Wealth Management, LLC.

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

### **A. Methods of Analysis and Investment Strategies**

TreeTop Wealth Management, LLC measures investors' goals, risk tolerance and time horizon through an interview process and questionnaire in an effort to determine investment strategies or a financial plan that, according to the Advisor's judgment, are best suited to fit the client's profile. Advice is individualized and tailored to meet the unique needs of each client. After TreeTop Wealth Management, LLC evaluates the client's financial needs, the Advisor will design investment and risk-management strategies to help the client achieve his or her financial goals.

If the Advisor provides specific investment strategies, this information may be based upon a number of concepts and determined by the type of investor. Investment strategies may include long-term and short-term purchases depending upon the individual needs of the client. The concept of asset allocation or spreading investments among a number of asset classes (domestic stocks, foreign stocks, bonds, foreign bonds, alternatives) is in the forefront of our strategies.

Asset allocation seeks to achieve the most efficient diversification of assets, to lessen risk while not sacrificing the effectiveness of the portfolio to yield the client's objectives. Since TreeTop Wealth Management, LLC believes that risk reduction is a key element to long-term investment success, asset allocation principles are a key part of the firm's overall approach in preparing advice for clients.

Recommendations for purchases or selling of investments will be based on publicly available reports and analysis. In the case of mutual funds or Exchange Traded Funds, recommendations will be based on reports and analysis of performance and managers, and certain computerized and other models for asset allocation.

TreeTop Wealth Management, LLC utilizes many sources of public information including financial newspapers and magazines, research papers, corporate rating services, annual reports, prospectuses and company press releases.

TreeTop Wealth Management, LLC gives advice on mutual funds, exchange traded funds, corporate debt, certificates of deposit, United States government securities, municipal securities, options contracts and equity securities.

### **B. Investment Strategy and Method of Analysis and Analysis Material Risks**

Investing in securities involves a risk of loss that the client should be prepared to bear.

### **C. Security Specific Material Risks**

TreeTop Wealth Management, LLC seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and international equity markets.



## **Item 9 Disciplinary Information**

### **A. Criminal or Civil Actions**

There has been no disciplinary action against TreeTop Wealth Management, LLC or Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman.

### **B. Administrative Enforcement Proceedings**

There has been no disciplinary action against TreeTop Wealth Management, LLC or Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman.

### **C. Self-Regulatory Organization Enforcement Proceedings**

There has been no disciplinary action against TreeTop Wealth Management, LLC or Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman.

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

### **A. Broker-Dealer or Representative Registration**

TreeTop Wealth Management, LLC is not affiliated with any broker-dealers and the Advisors Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman are not a registered representative of any broker-dealers. We do not receive compensation or commissions for any recommendations given other than our management fee charged to the client. We feel this allows us to be fiduciaries for our clients and do not have any material conflicts of interest with our clients.

### **B. Futures or Commodity Registration**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman are not registered as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

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

There are no material relationships or conflicts of interests maintained by TreeTop Wealth Management, LLC or Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman.

### **D. Recommendation or Selection of Other Investment Advisors and Conflicts of Interest**

TreeTop Wealth Management, LLC or Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman do not receive any compensation from recommending other Investment Advisors.

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

### **A. Code of Ethics Description**

TreeTop Wealth Management, LLC adheres to the CFP Board adopted Code of Ethics to establish the highest principles and standards. The seven principles include:

Principle 1 – Integrity: Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain or advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity: Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Certificants make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principle 5 – Confidentiality: Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism: Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence: Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

### **B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman do not recommend any securities which he or any related persons have a material financial interest.

### **C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

None of the Registrant's *Access Persons* may effect for themselves or for their immediate family (*i.e.*, spouse, minor children, and adults living in the same household as the *Access Person*) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of the Registrant's clients.

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

When the Registrant is purchasing/ selling or considering for purchase any security on behalf of a client, no *Access Person* may effect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security.

## Item 12 Brokerage Practices

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

TreeTop Wealth Management, LLC uses Fidelity Investments as our custodian. Fidelity Investments is used based upon the quality and cost of services provided. TreeTop Wealth Management, LLC is always evaluating and willing to change if it's beneficial to the client.

- 1) TreeTop Wealth Management, LLC does not receive soft dollar benefits.
  - a) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.
  - b) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.
  - c) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.
  - d) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.
  - e) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.
  - f) TreeTop Wealth Management, LLC does not receive any compensation from any party related to the broker-dealer firms for recommending broker-dealer firms.

2) TreeTop Wealth Management, LLC does not receive any compensation for client referrals.

- a) TreeTop Wealth Management, LLC does not receive any compensation for client referrals.
- b) TreeTop Wealth Management, LLC does not receive any compensation for client referrals.

3) a) TreeTop Wealth Management, LLC uses Fidelity Investments as our custodian. Fidelity Investments is used based upon the quality and cost of services provided. TreeTop Wealth Management, LLC is always evaluating and willing to change if it's beneficial to the client. If a client requests us to use a different custodian, TreeTop Wealth Management, LLC will take it into consideration.

b) N/A

### B) Aggregation

TreeTop Wealth Management, LLC does not aggregate client purchases. Our custodian charges certain fees for transactions and we do not control fee structure.

## **Item 13 Review of Accounts**

### **A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

TreeTop Wealth Management, LLC focuses on providing financial planning services which may involve advice on income, cash flow management, retirement, financial independence, college funding, estate planning, investment portfolio issues, tax saving strategies, and risk management. These services are offered on a discretionary money management fee. Portfolios are monitored and reviewed quarterly. We offer quarterly updates and clients can contact us at any time with any questions.

### **B. Review of Client Accounts on a Non-Periodic Basis**

For those clients to whom the Registrant provides investment management services, the Registrant monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. For those clients to whom the Registrant provides financial planning services, reviews are conducted on an “as needed” basis. Such reviews are conducted by one of the Registrant’s investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with the Registrant and to keep the Registrant informed of any changes thereto. The Registrant shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client’s financial situation and/or investment objectives.

### **C. Content of Client Provided Reports and Frequency**

Clients will receive standard account statements directly from their mutual fund or brokerage companies. These companies will send them monthly and or quarterly and when transactions occur. Clients engaged with TreeTop Wealth Management, LLC will receive quarterly portfolio summaries.

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

### **A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest**

TreeTop Wealth Management, LLC does not accept any economic benefits for providing financial planning services other than the discretionary management fee charged to Clients.

### **B. Advisory Firm Payments for Client Referrals**

TreeTop Wealth Management, LLC does not directly or indirectly compensate any person who is not the supervised person for client referrals.

## **Item 15 *Custody***

TreeTop Wealth Management, LLC does not have custody of client's funds or securities.

## **Item 16 Investment Discretion**

TreeTop Wealth Management, LLC does manage assets on a discretionary authority on behalf of clients.

Prior to engaging the Registrant to provide any of the foregoing investment advisory services, the client will be required to enter into one or more written agreements with the Registrant setting forth the terms and conditions under which the Registrant shall render its services (collectively the "*Agreement*").

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

A) TreeTop Wealth Management, LLC does not and will not accept authority to vote client securities.

B) Clients will receive proxies or other solicitations directly from custodian or transfer agent. Clients can contact TreeTop Wealth Management, LLC with any questions but client is responsible for voting proxies.

## **Item 18 Financial Information**

### **A. Balance Sheet**

- 1) TreeTop Wealth Management, LLC. does not require or solicit prepayment of fees.
- 2) TreeTop Wealth Management, LLC. does not require or solicit prepayment of fees.
- 3) TreeTop Wealth Management, LLC. does not require or solicit prepayment of fees.

**This entity does not have discretionary authority or custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.**

**Section 130.844 of the Rules set forth in the Illinois Securities Law of 1953, as amended (the “Act”) also indicates this fee. (See rule attached)**

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

All charges are in arrears on a quarterly basis. Since fees are taken for services already provided we don't run into a conflict to meet our contractual commitments to clients.

### **C. Bankruptcy Petitions During the Past Ten Years**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman were never the subject of a bankruptcy petition.

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

### **A. Principal Executive Officers and Management Persons**

**PATRICK RYAN NORD** is a managing principal.

Born in 1972.

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Brigham Young University – 1996, BA, English Literature

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 - Present

Fidelity Investments, Vice President, Senior Account Executive, 7/2008 – 9/2010

Fidelity Investments, Account Executive, 3/2002 – 6/2008

**DAVID PEDLEY** is a managing principal.

Born in 1975.

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Miami University – 1997, BS, Marketing

School Name – Year, Degree, Major

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 – Present

Fidelity Investments, Vice President, Senior Account Executive, 1/2006 – 9/2010

Fidelity Investments, Account Executive, 2/2003 – 12/2005

**KEVIN M. YEOMAN** is a managing principal.

Born in 1976

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Xavier University – 1999, BS, Business

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 – Present

Fidelity Investments, Vice President, Senior Account Executive, 7/2008 – 9/2010

Fidelity Investments, Account Executive, 10/2004 – 6/2008

### **B. Other Business Activities Engaged In**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman are not engaged in any other business activities.

**C. Performance Based Fee Description**

TreeTop Wealth Management, LLC may also provide services to *qualified clients* for a performance-based fee in accordance with the requirements set forth in applicable laws, rules, and regulations. For those clients, TreeTop Wealth Management, LLC shall charge its fees based upon a percentage of the market value of the assets being managed by TreeTop Wealth Management, LLC (“*base fee*”) in addition to a fee based on the performance of the account (“*performance fee*”).

TreeTop Wealth Management shall charge a *performance fee* of ten percent (10%) of the net performance subject to a high water mark. TreeTop Wealth Management will also charge a *base fee* which shall vary (between 0.25% and 0.50%) depending upon the market value of the assets under management and the type of investment management services to be rendered, as follows:

**PORTFOLIO VALUE BASE FEE**

First \$5,000,000 .....	0.50%
Next \$5,000,000 .....	0.40%
above \$10,000,000 .....	0.25%

TreeTop Wealth Management, LLC annual *base fee* shall be prorated and charged quarterly, in arrears, based upon the average market value of the assets during the previous quarter. The Registrant’s *performance fee* shall be charged annually, in arrears, based on the net gains of the client’s portfolio at the end of the calendar period.

Conflict of Interest- Under this fee arrangement, there is the potential for a conflict of interest in that the *performance fee* may be an incentive for the Registrant to make investments that are riskier or more speculative in than would be the case absent a *performance fee* arrangement. TreeTop Wealth Management, LLC avoids conflict of interest by keeping to our fiduciary responsibility to our client.

**D. Disclosure of Material Facts related to Arbitration or Disciplinary Actions Involving Management Persons**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman have not had any disciplinary actions against them.

- 1) N/A
- 2) N/A

**E. Material Relationships Maintained by this Advisory Business or Management Persons With Issuers of Securities**

Patrick Ryan Nord, David J. Pedley and Kevin M. Yeoman do not have any material relationships with issuers of securities.



## PART **2B** of FORM ADV

### **SUPERVISED PERSON BROCHURE SUPPLEMENT**

This brochure supplement provides information about [Patrick Ryan Nord] that supplements the TreeTop Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact TreeTop Wealth Management LLC at 847-386-6707 if you did not receive TreeTop Wealth Management LLC brochure or if you have any questions about the contents of this supplement.

Additional information about *TreeTop Wealth Management, LLC* is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 1 Cover Page**

A)

- 1) Patrick Ryan Nord  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
  
- 2) TreeTop Wealth Management, LLC.  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
  
- 3) Date of Supplement 2/25/2013

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

### **PATRICK RYAN NORD**

Born in 1972.

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Brigham Young University – 1996, BA, English Literature

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 - Present

Fidelity Investments, Vice President, Senior Account Executive, 7/2008 – 9/2010

Fidelity Investments, Account Executive, 3/2002 – 6/2008

## **Item 3 Disciplinary Information**

### **A. Criminal or Civil Actions**

There has been no disciplinary action against Patrick Ryan Nord.

### **B. Administrative Enforcement Proceedings**

There has been no disciplinary action against Patrick Ryan Nord.

### **C. Self-Regulatory Organization Enforcement Proceedings**

There has been no disciplinary action against Patrick Ryan Nord.

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

Patrick Ryan Nord is not engaged in any other business activities.

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

Patrick Ryan Nord is not engaged in any other additional compensation.

#### **Item 6 Supervision**

Patrick Ryan Nord is supervised by the Compliance Committee made up of Kevin M. Yeoman, David J. Pedley and Patrick Ryan Nord. Kevin M. Yeoman Chief Compliance Officer (847-386-6707) observes meetings with clients, monitors e-mails and recordkeeping entered into TreeTop Wealth Management CRM system. David J. Pedley Chief Investment Officer (847-386-6707) observes meetings with clients and investments used in portfolios. Patrick Ryan Nord Chief Executive Officer (847-386-6707) observes meetings with clients; ensure that all personnel under supervision conduct activities in a manner that is in compliance with the compliance manual.

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

A

- 1) There have been no disciplinary actions against Patrick Ryan Nord.
- 2) There have been no disciplinary actions against Patrick Ryan Nord.

B

Patrick Ryan Nord has NOT been subject to bankruptcy petition.

## PART 2B of FORM ADV

### **SUPERVISED PERSON BROCHURE SUPPLEMENT**

This brochure supplement provides information about [David J. Pedley] that supplements the TreeTop Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact TreeTop Wealth Management LLC at 847-386-6707 if you did not receive TreeTop Wealth Management LLC brochure or if you have any questions about the contents of this supplement.

Additional information about *TreeTop Wealth Management, LLC* is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 1 Cover Page

A)

- 1) David J. Pedley  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
  
- 2) TreeTop Wealth Management, LLC.  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
  
- 3) Date of Supplement 2/25/2013

## Item 2 Educational Background and Business Experience

### DAVID PEDLEY

Born in 1975.

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Miami University – 1997, BS, Marketing

School Name – Year, Degree, Major

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 – Present

Fidelity Investments, Vice President, Senior Account Executive, 1/2006 – 9/2010

Fidelity Investments, Account Executive, 2/2003 – 12/2005

## Item 3 Disciplinary Information

### A. Criminal or Civil Actions

There has been no disciplinary action against David J. Pedley.

### B. Administrative Enforcement Proceedings

There has been no disciplinary action against David J. Pedley.

### C. Self-Regulatory Organization Enforcement Proceedings

There has been no disciplinary action against David J. Pedley.

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

David J. Pedley is not engaged in any other business activities.

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

David J. Pedley is not engaged in any other additional compensation.

#### **Item 6 Supervision**

David J. Pedley is supervised by the Compliance Committee made up of Kevin M. Yeoman, David J. Pedley and Patrick Ryan Nord. Kevin M. Yeoman Chief Compliance Officer (847-386-6707) observes meetings with clients, monitors e-mails and recordkeeping entered into TreeTop Wealth Management CRM system. David J. Pedley Chief Investment Officer (847-386-6707) observes meetings with clients and investments used in portfolios. Patrick Ryan Nord Chief Executive Officer (847-386-6707) observes meetings with clients; ensure that all personnel under supervision conduct activities in a manner that is in compliance with the compliance manual.

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

A

- 1) There have been no disciplinary actions against David J. Pedley.
- 2) There have been no disciplinary actions against David J. Pedley.

B

David J. Pedley has NOT been subject to bankruptcy petition.

## PART 2B of FORM ADV

### **SUPERVISED PERSON BROCHURE SUPPLEMENT**

This brochure supplement provides information about [Kevin M. Yeoman] that supplements the TreeTop Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact TreeTop Wealth Management LLC at 847-386-6707 if you did not receive TreeTop Wealth Management LLC brochure or if you have any questions about the contents of this supplement.

Additional information about *TreeTop Wealth Management, LLC* is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 1 Cover Page**

A)

- 1) Kevin M. Yeoman  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
- 2) TreeTop Wealth Management, LLC.  
One Northfield Plaza Suite 106  
Northfield, IL 60093  
847-386-6707
- 3) Date of Supplement 2/25/2013

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

### **KEVIN M. YEOMAN**

Born in 1976

Examinations/Professional Designations:

CFP, CERTIFIED FINANCIAL PLANNER since 2005.

*Post-Secondary Education:*

Xavier University – 1999, BS, Business

*Recent Business Background:*

Treetop Wealth Management, LLC, Managing Principal, 10/2010 – Present

Fidelity Investments, Vice President, Senior Account Executive, 7/2008 – 9/2010

Fidelity Investments, Account Executive, 10/2004 – 6/2008

## **Item 3 Disciplinary Information**

### **A. Criminal or Civil Actions**

There has been no disciplinary action against Kevin M. Yeoman.

### **B. Administrative Enforcement Proceedings**

There has been no disciplinary action against Kevin M. Yeoman.

### **C. Self-Regulatory Organization Enforcement Proceedings**

There has been no disciplinary action against Kevin M. Yeoman.



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

Kevin M. Yeoman is not engaged in any other business activities.

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

Kevin M. Yeoman is not engaged in any other additional compensation.

#### **Item 6 Supervision**

Kevin M. Yeoman is supervised by the Compliance Committee made up of Kevin M. Yeoman, David J. Pedley and Patrick Ryan Nord. Kevin M. Yeoman Chief Compliance Officer (847-386-6707) observes meetings with clients, monitors e-mails and recordkeeping entered into TreeTop Wealth Management CRM system. David J. Pedley Chief Investment Officer (847-386-6707) observes meetings with clients and investments used in portfolios. Patrick Ryan Nord Chief Executive Officer (847-386-6707) observes meetings with clients; ensure that all personnel under supervision conduct activities in a manner that is in compliance with the compliance manual.

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

A

- 1) There have been no disciplinary actions against Kevin M. Yeoman
- 2) There have been no disciplinary actions against Kevin M. Yeoman.

B

Kevin M. Yeoman has NOT been subject to bankruptcy petition.