

Form ADV Part 2A - Firm Brochure

Dated January 28, 2025

Treo Financial, LLC
34 Wilshire Dr
Asheville, NC 28806

Contact Information:

Justinn Steffe CFP®
Phone: (317) 417-1373
Email: jsteffe@treo-financial.com
Website: www.treo-financial.com

This brochure provides information about the qualifications and business practices of Treo Financial, LLC. If you have any questions about the contents of this brochure, please contact us at: 317- 417-1373, or by email at: jsteffe@treo-financial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Treo Financial, LLC is a registered investment adviser in the State of North Carolina. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Treo Financial, LLC is available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Material Changes

Single session fixed fee has remained constant at \$150 per session.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting Justinn C. Steffe, Principal at 317-417-1373 or jsteffe@treo-financial.com. Brochures are provided free of charge.

Additional information about Treo Financial, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Treo Financial, LLC who are registered as Investment Adviser Representatives of Treo Financial, LLC.

Item 3: Table of Contents

Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3: Table of Contents	2
Item 4: Advisory Business	3
Item 5: Fees and Compensation	6
Item 6: Performance Based Fees and Side-By-Side Management	7
Item 7: Types of Clients	8
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss	8
Item 9: Disciplinary Information	10
Item 10: Other Financial Industry Activities and Affiliations	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .	10

Item 12: Brokerage Practices	13
Item 13: Review of Accounts	14
Item 14: Client Referrals and Other Compensation	14
Item 15: Custody	15
Item 16: Investment Discretion	15
Item 17: Voting Client Securities	15
Item 18: Financial Information	15
Item 19: Requirements for State Registered Advisors	15

Item 4: Advisory Business

Firm Description

Treo Financial, LLC is a limited liability company organized under the laws of the State of North Carolina. We are a fee- only, holistic financial planning firm established in 2021 that specializes in providing personalized, confidential, education and financial planning services to individuals and groups. Our mission is to provide financial education and support in a way that enables people who are doing good work in the world to continue to live their mission while feeling secure at the same time. We recognize that working as an educator, an entrepreneur, a contract employee or at a non profit sometimes means sacrificing high earnings for a chance to do work that you love and that is important.

All services are tailored to the client's unique objectives.

Principle Owner(s)

Treo Financial, LLC is owned and operated by Justinn C. Steffe CFP®

Types of Advisory Services

Education: Treo Financial will host single session education classes and multi session education courses. Topics for education will focus on a variety of personal finance skills such as budgeting, debt paydown, and investing. Session topics may include any component within the CFP® scope

of practice. Education sessions will be approximately one hour in length and include lecture, discussion, and question and answer about the topic. Education sessions may be recorded and stored on the Treo Financial website.

Office Hours - A financial planner will host a scheduled live stream chat session that is available for students currently enrolled in the multi session education courses. These sessions are an opportunity for enrolled students to ask any specific questions they have regarding their finances or from a topic that they are learning during the courses.

Financial Advice - This service is for people who have questions on specific topics relating to their financial path. Conversations will be dynamic in nature as they will be a blend of education and brainstorming with a financial planner. These are one-one sessions and focused on individuals goals and questions. Planning sessions will be remote using Google Meet or Zoom.

After the session individuals will receive an email recapping the conversation as well as action points for the topics discussed during the session. Sessions will be approximately 1 hour in length.

Business Services - Businesses may sponsor multi session education courses or single session education classes for their employees. These sponsored sessions will be exclusive to their staff and taught by a certified financial planner. Topics for education will focus on a variety of personal finance skills such as budgeting, debt paydown, and investing. Session topics may include any component within the CFP® scope of practice. Education sessions will be approximately one hour in length and include lecture, discussion, and question and answer about the topic. Education sessions may be recorded and stored on the Treo Financial website. Participants in the multi session education course will have access to office hours as described above.

Engagement with Treo Financial, LLC

During or prior to your first meeting with our firm you will be provided with a current Form ADV Part 2 firm brochure that includes a statement with regard to our privacy policy. We will also ensure that we disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Treo Financial, LLC for its advisory and education services, you must first enter into a written agreement with our firm. Thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of

the engagement, you may be asked to provide current copies of the following documents early in the process:

- Mortgage information
- Financial data that may include tax returns, W-2s or 1099s and/or paystubs
- Information on retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Credit card balances and interest rates
- Student loan documents
- Auto, home loans, HELOCs, and other liabilities
- Wills, codicils and trusts
- Divorce decree
- Insurance policies
- Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and/or financial statements you provide are accurate. Our firm may, but is not obligated to, verify the information you have provided, which will then be used in the advisory process. It is also necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement including, but not limited to: source of funds, income levels, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for you. Treo Financial is not planning to implement or monitor your plan which is outlined in the engagement letter.

General Information

Treo Financial, LLC does not provide legal, accounting or insurance services. With your consent, we may work with other professional advisors, such as an accountant, attorney or insurance representative to assist with coordination and implementation of accepted strategies. You should be aware that these other entities will charge you separately for their services and these fees will be in addition to our own advisory fee.

Our firm will use its best judgment and good faith effort in rendering its services. Treo Financial, LLC cannot warrant or guarantee the achievement of a planning goal or any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and

diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Miscellaneous Required Disclosures

Treo Financial, LLC does not participate in or sponsor any wrap-fee programs.

Treo Financial, LLC manages our Clients' assets on an advisory basis only. We do not consider our Clients' assets to be "assets under management" as defined by the SEC

Item 5: Fees and Compensation

Fees

The specific manner in which fees are charged by Treo Financial, LLC is established in a Client's written agreement with Treo Financial, LLC, the variations of which are described below.

Fees are calculated and collected on a per session basis. Fees are not charged on an ongoing or retainer basis. Written notice of at least thirty (30) days will be provided of any changes to our fee schedule. Payment is made through a third-party payment processor such as Quickbooks Online (Intuit Payment Network) and/or PayPal.

Fee Structure:

Item	Amount	Services Provided
Single Session Financial Advising	\$150	One hour advising session with a certified financial planner. Clients will receive a written summation of the conversation after completion of the session
Multi Session Financial Advising and Coaching Package	\$400	- One 1 hour long financial advising session with post session write up. - Three 1 hour long support calls

Multiple Session Education Course	\$150	<ul style="list-style-type: none"> - Four 1.5 hour long education classes over the course of 1-2 months. - Course session are recorded for participant review - Access to the course slack channel - One 1 hour long office hours session with a certified financial planner.
Business Sponsored Single Session Education class	\$250-\$400 <i>Depending on class size</i>	<ul style="list-style-type: none"> - One 1.5 hour education class for the businesses staff/employees.
Business Sponsored Multi Session Education Course	\$50 - \$75 per participant (Price per participant decreases with volume)	<ul style="list-style-type: none"> - Four 1.5 hour long education classes over the course of 1-2 months. - Access to an exclusive course slack channel - One 1 hour long office hours session with a certified financial planner.

Past Due Accounts and Termination of Agreement

Treo Financial, LLC reserves the right to stop work on any account that is more than thirty (30) days overdue. In addition, Treo Financial, LLC reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, and which in Treo Financial, LLC's opinion, affects our ability to provide proper financial advice.

Either the Client or Treo Financial, LLC may terminate an engagement at any time, without penalty, upon a thirty (30) day written notice. Upon termination of any agreement, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. Whether fees have been earned or unearned will be determined by the Advisor in Advisor's sole discretion.

Miscellaneous Required Disclosures

Treo Financial, LLC is a fee-only financial advisory firm and does not sell investment or insurance products. In addition, we do 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.

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

Treo Financial, LLC does not charge any performance-based fees (i.e. fees based on a share of capital gains on or capital appreciation of the assets of a client). As such, this item is not applicable to our firm. Fees are not based on a share of the capital gains or capital appreciation of managed securities and therefore we do not engage in side-by-side management.

Item 7: Types of Clients

We encourage interested parties of all economic levels to seek our advisory services. We do not require minimum income, minimum asset levels or other similar preconditions. Treo Financial, LLC reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

Client relationships vary in scope and length of service.

We strive to work with people from all different walks of life. As such, we maintain no minimum net worth or asset requirements. As discussed above, the client's advisory relationship agreement and fee will be based on each client's circumstances.

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

Methods of Analysis

For all of our advisory services, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- reasonable investment restrictions involving your account(s)

Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, annual reports as well as prospectuses and other regulatory filings.

Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. Generally, our investment advice is based on *Modern Portfolio Theory* and the belief that proper diversification and risk

management will provide an investor client with a stable and consistent return over time. The practice of Modern Portfolio Theory does not employ market timing or stock selection methods of investing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

We believe that passive investments should make up the bulk of your portfolio. As such, the core of portfolio recommendations will be with low - cost index funds or ETF's. We typically recommend portfolios that contain investment vehicles that are considered low cost, diversified, and tax efficient whenever possible. Treo Financial, LLC makes asset allocation recommendations based on these and other factors. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Treo Financial, LLC makes portfolio recommendations but does not invest assets for clients. Clients are charged with taking the information, making a decision, and implementing the recommendations.

Risk of Loss

Investing in securities involves risk of loss that Clients should be prepared to bear. The inherent risks associated with any investment recommended by Treo Financial, LLC will be thoroughly reviewed and discussed in light of Client's goals, needs, and objectives at the forefront. This will help ensure the Client fully understands his/her investments and that he/she is properly prepared to bear any associated risks.

Our investment approach constantly keeps the risk of loss in mind. In doing so, we will use our best judgment and good faith efforts in rendering services to our Clients. However, we cannot warrant or guarantee any particular level of account performance, or that any account will be profitable over time. Not every investment decision or recommendation made by an Advisor will be profitable. Client assumes all market risk involved in the investment of account assets and understands that investment decisions made for this account are subject to various market, currency, economic, political and business risks.

Except as may otherwise be provided by law, Treo Financial, LLC will not be liable to client for:

- Any loss that a client may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to a client's instructions; or
- Any act or failure to act by a custodian of a client's account.

- The above language does not relieve Advisor from any responsibility or liability Advisor may have under state or federal statutes.

Item 9: Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

Item 10: Other Financial Industry Activities and Affiliations

As noted earlier, Treo Financial, LLC does not sell insurance or investment products, nor does it accept commission as a result of any product recommendations. In addition, no management persons or other employees of Treo Financial LLC are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker- dealer. No one associated with Treo Financial LLC is registered or has an application to register as a future commission merchant, commodity pool operating, or commodity trading advisor, therefore there is nothing in these SEC-required disclosures that is applicable to our firm.

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

Treo Financial, LLC seeks to avoid material conflicts of interest. Accordingly, neither Advisor nor its investment adviser representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

Treo Financial, LLC believes that its business methodologies, ethics rules and adopted policies are appropriate to mitigate material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics Description

The firm holds itself to a *fiduciary standard*, which means we will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients. We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the

obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. Treo Financial, LLC periodically reviews and amends its Code of Ethics to ensure that it remains current and requires firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

CERTIFIED FINANCIAL PLANNER[®] Professionals, such as Ms. Justinn Steffe, adhere to the Certified Financial Planner Board of Standards, Inc. principles, which state:

Principle 1 □ Integrity

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain or advantage. Advisors are placed by clients in positions of trust, and the ultimate source of that trust is the advisor[®] 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[®] principles.

Principle 2 □ Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 □ Competence

Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill and applies that knowledge effectively 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. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 □ Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one[®] 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 and is an essential trait of any professional.

Principle 5 □ Confidentiality

Advisors will 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□□□ information will remain confidential.

Principle 6 □ Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the public image and improve the quality of services.

Principle 7 □ Diligence

Advisors will 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.

Statement Involving Our Privacy Policy

We respect the privacy of all clients and prospective clients both past and present). It is recognized that you have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information customers provide to complete their financial plan or investment recommendation.
- Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account.
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about transactions.
- The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:
 - When required to provide services, our customers have requested.
 - When our customers have specifically authorized us to do so.

- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted, or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled for the firm is confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information. The firm will provide our customers with its privacy policy on a cyclical basis per regulatory guidelines and at any time, in advance, if firm privacy policies are expected to change.

Firm/Personnel Purchases of Same Securities Recommended to Clients and Conflicts of Interest

Treo Financial, LLC does not buy or sell securities for its clients.

Item 12: Brokerage Practices

Selecting Brokerage Firms

While Treo Financial, LLC may use its discretion when recommending a broker- dealer, clients are not obligated to effect transactions through any broker-dealer recommended by Treo Financial, LLC. Treo Financial, LLC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates, but never requires Clients to utilize any given custodian/broker-dealer.

Treo Financial, LLC typically recommends discount brokerage firms and trust companies (qualified custodians), such as Fidelity and Vanguard or Wealthfront or Betterment. Treo Financial, LCC *DOES NOT* receive fees or commissions from any of these arrangements.

Clients are not obligated to effect transactions through any broker-dealer recommended by us. In recommending broker-dealers, we will generally seek “best execution.” In recommending a broker-dealer we will comply with our fiduciary duty to obtain best execution and with the Securities Exchange Act of 1934 and will take into account such relevant factors as:

- Price, including transaction costs and other fees charged,
- The custodian’s facilities, reliability and financial responsibility,
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size and execution of order,

- The research and related brokerage services provided by such custodian to is, notwithstanding that the Account may not be the direct or exclusive beneficiary of such services, and
- Any other factors that we consider to be relevant.

Recommending a broker dealer can create a conflict of interest. Accordingly Advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer, associated person, or employee of Advisor shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public or reasonable inquiry. No person of Advisor shall prefer his or her own interest to that of the advisory client;
2. Advisor emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where Advisor has been granted discretionary authority over the client's account;
3. Advisor emphasizes the unrestricted right of the client to select and choose any broker or dealer, and/or insurance company he/she wishes; and
4. Advisor requires that all associated individuals act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

Item 13: Review of Accounts

Unless specified in your engagement document with the firm, Treo Financial, LLC does not periodically review accounts. We strongly recommend you contact our firm for a review when you anticipate or have experienced changes in your financial situation (i.e., employment or marital status, inheritance, the birth of a new child, etc.).

Item 14: Client Referrals and Other Compensation

Treo Financial, LLC is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. Treo Financial, LLC does not pay referral or finder's fee, nor does it accept such fees from other firms.

Treo Financial, LLC does accept referrals. The referrals come from current clients, business contacts, personal friends and other similar sources. The firm, however, does not compensate referring parties for these referrals, nor does it accept such fees from other firms or individuals.

Item 15: Custody

Treo Financial, LLC does not take custody of Client funds, securities, or assets; all Client assets are deposited with qualified custodians. Because Advisor does not have custody of the assets in the account, we shall have no liability to the client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer.

Item 16: Investment Discretion

Treo Financial, LLC does not manage securities accounts on behalf of clients therefore there is no discretionary authority for trading.

Item 17: Voting Client Securities

As a matter of firm policy and practice, Treo Financial, LLC does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Treo Financial, LLC does not provide advice to clients regarding the clients' voting of proxies.

Item 18: Financial Information

Financial Condition

Treo Financial, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Treo Financial LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees six months or more in advance. Specifically, Treo Financial LLC does not require or solicit prepayment of more than \$500 in fees per client six months or more in advance.

Item 19: Requirements for State Registered Advisers

A. Treo Financial, LLC is owned and operated by Justinn Steffe, CFP®. Education and background information for Ms. Steffe is detailed in Part 2B, below.

B. See Item 10 above.

C. Treo Financial, LLC does not receive performance-based fees.

D. Neither Treo Financial, LLC nor its management persons or employees have been involved in any arbitration claims or been found liable in a civil, self-regulatory organization, or administrative proceeding.

E. Neither Treo Financial, LLC nor its management persons have a relationship or arrangements with any issuer of securities, and therefore we have no information to disclose applicable to this Item.

Treo Financial LLC's Chief Compliance Officer, Justinn Steffe, remains available to address any questions regarding this Brochure.

Treo Financial, LLC

Part 2B of form ADV - Brochure Supplement

Justinn C Steffe

Treo Financial, LLC

34 Wilshire Dr

Asheville, NC 28806

Mailing Address:

Phone: 317-417-1373

Web Site: www.treo-financial.com Date of Brochure: January 28, 2025

This brochure supplement provides information about Justinn C Steffe, Principal and Investment Advisor Representative, Treo Financial, LLC, that supplements the Treo Financial, LLC brochure. You should have received a copy of that brochure. Please contact us at 317-417-1373 if you did not receive a brochure or if you have any questions about the contents of this supplement.

Additional information about Justinn C Steffe (CRD # 280616) is available on the SEC's website at www.adviserinfo.sec.gov.

We require any supervised person involved in the practice of giving investment advice or consulting to clients to have at a minimum, a bachelor degree from an accredited university. These persons must also pass appropriate licensing examinations and are strongly encouraged to seek continuing education opportunities available in the industry, including appropriate certifications or designations.

Part 2B - 1 (Steffe)

Treo Financial, LLC

Part 2B of Form ADV – Brochure Supplement

Justinn C. Steffe, CFP®

Year of Birth: 1980

Item 2 – Educational Background and Business Experience

Education:

Master of Business Administration, University of Central Florida, 2006

Master of Sports Business Management, University of Central Florida, 2006

B.A. Economics and Management, Albion College, 2003

Business:

May 2021 – Current Treo Financial, LLC, Partner, Financial Planner, Investment Advisor Representative

2013 - Current Warren Wilson College, Faculty of Business and Outdoor Leadership

2006 - Current North Carolina Outward Bound School, Program Manager and Facilitator

Professional Designations:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP marks are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent

and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

Ms. Steffe has never been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Treo Financial, LLC provides.

Item 4 – Other Business Activities

Ms. Steffe has the following other business activity:

1. Professor of Business and Outdoor Leadership at Warren Wilson College in Asheville NC. This is a full time w2 10 month contract.
2. Personal Real Estate Investor. Owns and manages 3 rental properties in Asheville NC.
3. Paddling Instructor for the Nantahala Outdoor Center and the North Carolina Outward Bound School. Part time.

Item 5 – Additional Compensation

Ms. Steffe does not receive additional compensation or economic benefit from third parties for providing advisory services to clients of Treo Financial, LLC.

Item 6 – Supervision

Ms. Steffe is responsible for all services and advice provided to clients of Treo Financial, LLC. Ms. Steffe prepares all investment policies, forms and procedures for working with clients and for managing the firm.

Item 7 – Requirements for State-Registered Advisers

Ms. Steffe has never been subject to any arbitration claim or any other proceedings (civil, self-regulatory organization or administrative) related to investments, fraud, theft, bribery or dishonest, unfair or unethical practices. Ms. Steffe has never been the subject of any bankruptcy petition.