

# **SilverLake Wealth Management LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 9, 2013**

This Disclosure Brochure provides information about the qualifications and business practices of SilverLake Wealth Management LLC (“SilverLake”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (802) 857-5083.

SilverLake is a Registered Investment Advisor with the State of Vermont. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about SilverLake to assist you in determining whether to retain the Advisor.

Additional information about SilverLake and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**SilverLake Wealth Management LLC**  
CRD No: 165525  
33 Blair Park Road, Suite 100  
Williston, VT 05495  
Phone: (802) 857-5083 \* Fax: (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of SilverLake.

SilverLake believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

SilverLake is a newly formed Registered Investment Advisor that is seeking state registration in Vermont.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of SilverLake.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for SilverLake:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **165525** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (802) 857-5083.

### Item 3 – Table of Contents

---

<b>Item 1 – Cover Page.....</b>	<b>1</b>
<b>Item 2 – Material Changes.....</b>	<b>2</b>
<b>Item 3 – Table of Contents.....</b>	<b>3</b>
<b>Item 4 – Advisory Services .....</b>	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	5
D. Wrap Fee Programs .....	5
E. Assets Under Management.....	5
<b>Item 5 – Fees and Compensation.....</b>	<b>6</b>
A. Fees for Advisory Services .....	6
B. Fee Billing .....	6
C. Other Fees and Expenses .....	6
D. Advance Payment of Fees and Termination.....	7
E. Compensation for Sales of Securities .....	7
<b>Item 6 – Performance-Based Fees and Side-By-Side Management .....</b>	<b>7</b>
<b>Item 7 – Types of Clients .....</b>	<b>7</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>7</b>
A. Methods of Analysis.....	7
B. Risk of Loss.....	8
<b>Item 9 – Disciplinary Information .....</b>	<b>8</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>9</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>9</b>
A. Code of Ethics.....	9
B. Personal Trading with Material Interest.....	9
C. Personal Trading in Same Securities as Clients.....	9
D. Personal Trading at Same Time as Client .....	10
<b>Item 12 – Brokerage Practices.....</b>	<b>10</b>
A. Recommendation of Custodian[s].....	10
B. Aggregating and Allocating Trades .....	10
<b>Item 13 – Review of Accounts.....</b>	<b>11</b>
A. Frequency of Reviews .....	11
B. Causes for Reviews .....	11
C. Review Reports .....	11
<b>Item 14 – Client Referrals and Other Compensation.....</b>	<b>11</b>
A. Compensation Received by SilverLake .....	11
B. Client Referrals from Solicitors .....	11
<b>Item 15 – Custody .....</b>	<b>11</b>
<b>Item 16 – Investment Discretion .....</b>	<b>12</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>12</b>
<b>Item 18 – Financial Information .....</b>	<b>12</b>
 <b>ADV Part 2B – Briand, Richard .....</b>	 <b>13</b>
<b>ADV Part 2B – Eddy, Robert .....</b>	<b>16</b>
<b>ADV Part 2B – Golonka, Thomas .....</b>	<b>19</b>
<b>ADV Part 2B – Rhiele, Theodore.....</b>	<b>22</b>
<b>ADV Part 2B – Steele, Jeffrey.....</b>	<b>25</b>
 <b>Privacy Policy.....</b>	 <b>28</b>

## **Item 4 – Advisory Services**

---

### **A. Firm Information**

SilverLake Wealth Management LLC (“SilverLake” or the “Advisor”) is a Registered Investment Advisor with the State of Vermont, which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Vermont. SilverLake was founded in October 2005, and is owned and operated by Managing Partners, Richard J. Briand, Robert Eddy, Thomas Golonka, Theodore Rhiele, and Jeffrey Steele. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SilverLake.

### **B. Advisory Services Offered**

SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, and estates in Vermont and other states (each referred to as a “Client”).

#### Account Portfolio Management

SilverLake’s investment philosophy is customized to the needs of each Client based on a deep understanding of the Client’s long-term goals. SilverLake provides continuous personal Client contact and interaction while providing investment management and consulting services. Silverlike primarily offers discretionary investment management services, but Client’s may request such services to be provided on a non-discretionary basis. SilverLake works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. SilverLake may also offer non-discretionary management upon request of the Client.

SilverLake will then construct a portfolio, consisting of individual equity securities, individual fixed income securities, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize other investment types, as appropriate, to meet the needs of its Clients. Diversification is sought to reduce overall portfolio risk, which can include using different asset classes as well as different sectors/industries.

Depending on the needs of each Client, SilverLake may create a customized portfolio or invest all or a portion of Client assets in its model portfolios. Portfolio construction strategy is developed based on the needs of each Client, including such factors as other investments, tax sensitivity, and/or the alignment of a SilverLake portfolio with a Client’s particular needs.

SilverLake’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. SilverLake will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

SilverLake evaluates and selects investments for inclusion in Client portfolios only after applying their internal due diligence process. SilverLake may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SilverLake may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. SilverLake may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

SilverLake will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will SilverLake accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

### Financial Planning Services

SilverLake will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. SilverLake may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For planning engagements that encompass an ad-hoc analysis, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging SilverLake to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – SilverLake, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – SilverLake will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – SilverLake will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – SilverLake will provide investment management and ongoing oversight of the Client's portfolio and overall account.

### **D. Wrap Fee Programs**

SilverLake does not manage a wrap fee program. SilverLake may pay the transaction fees for Client accounts as part of its overall Investment Advisory Fees. The inclusion of these transaction costs into the investment advisory fee is sometimes considered a "wrap fee program". While a traditional wrap fee program has a defined set of investment options and uniform trading practices, SilverLake *customizes* its investment advisory services for its Clients. Please see Item 5 – Fees and Compensation for details regarding fees.

### **E. Assets Under Management**

As of the date of this filing, January 29, 2013, the Advisor manages approximately \$45,000,000 in discretionary assets and \$0 in non-discretionary assets. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of SilverLake and the Client.

### **A. Fees for Advisory Services**

#### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 0.50% to 1.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Investment Advisory Fees are negotiable and the agreed upon fee will be included in the Investment Advisory Agreement. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by SilverLake will be independently valued by the designated Custodian. SilverLake will not have the authority or responsibility to value portfolio securities.

#### Financial Planning Services

SilverLake offers financial planning services on an hourly basis at a rate of up to \$300 per hour or on a fixed fee basis, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship so that the Client will have a full understanding of the total fees for the respective planning engagement. The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

### **B. Fee Billing**

#### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian under the contractual arrangement between the Custodian and the Client. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with SilverLake at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting SilverLake to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than SilverLake, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by SilverLake is separate and distinct from these custodian and execution fees.

In addition, all fees paid to SilverLake for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee.



A Client could invest in these products directly, without the services of SilverLake, but would not receive the services provided by SilverLake which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SilverLake to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Account Portfolio Management

SilverLake is compensated for its services in advance the quarter in which investment advisory services are rendered investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with SilverLake, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

##### Financial Planning Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at anytime by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

#### **E. Compensation for Sales of Securities**

SilverLake does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

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

---

SilverLake does not charge performance-based fees for its investment advisory services. The fees charged by SilverLake are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. SilverLake does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

---

SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, and estates in Vermont and other states. The relative percentage each type of Client is available on SilverLake's Form ADV Part 1. These percentages will change over time. SilverLake generally does not impose a minimum account size for establishing a relationship.

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

---

#### **A. Methods of Analysis**

SilverLake primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. The Advisor may also employ other analysis methods. Research and analysis from SilverLake is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others. As noted above, SilverLake generally employs a long-term investment strategy for its

Clients, as consistent with their financial goals. SilverLake will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, SilverLake may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. SilverLake will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

### Market Risk

The price of a security may decrease in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a securities particular underlying circumstances.

### Fundamental Analysis

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.

In its technical analysis, the Advisor seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. While this type of analysis helps the Advisor to determine approximate timing for purchases and sales, it does not guarantee that the investment will increase in value.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving SilverLake or any of its employees.** SilverLake and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **165525** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Richard J. Briand by selecting the Investment Adviser Representative and entering Mr. Briand's Individual CRD# **1045809** in the field labeled "Individual CRD Number".



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

---

### **Broker-Dealer Affiliation**

Advisory Persons of SilverLake are also registered representatives of LPL Financial, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein “LPL”). In their separate capacity as registered representatives, Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons of SilverLake. Neither SilverLake nor its Advisory Persons will earn investment advisory fees in connection with any services implemented in an Advisory Person’s separate capacity as a registered representative where commissions are also earned.

Generally, recommendations made by SilverLake to its Clients are implemented by Advisory Persons in their role as Investment Advisor Representatives of SilverLake and not in their role as a Registered Representatives. As such, Clients of SilverLake only pay advisory fees as described above. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment.

### **Insurance Agency Affiliations**

Certain Advisory Persons of SilverLake are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person’s role with the SilverLake. As insurance professionals, these Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

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

---

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

SilverLake has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SilverLake. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. SilverLake and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SilverLake associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. SilverLake has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (802) 857-5083.

### **B. Personal Trading with Material Interest**

SilverLake allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SilverLake does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. SilverLake does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

SilverLake allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

#### **D. Personal Trading at Same Time as Client**

While SilverLake allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these are either grouped with Client trades or they will be placed only after Client orders have been placed and filled.

**At no time, will SilverLake or any associated person of SilverLake, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

---

#### **A. Recommendation of Custodian[s]**

SilverLake does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize SilverLake to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, SilverLake does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where SilverLake does not exercise discretion over the selection of the custodian, they do recommend the custodian[s] to Clients for execution and/or custodial services. SilverLake will primarily recommend LPL Financial as a custodian based on the affiliation its Advisory Persons have with LPL. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by SilverLake. SilverLake may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. SilverLake does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **SilverLake does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. Brokerage Referrals** - SilverLake does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where SilverLake will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, SilverLake will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

#### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. SilverLake will execute its transactions through an unaffiliated broker-dealer selected by the Client. SilverLake may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Principals of SilverLake. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify SilverLake if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

---

### **A. Compensation Received by SilverLake**

#### Broker-Dealer Affiliation

Certain Advisory Persons of SilverLake are also registered representatives of LPL Financial. In their separate capacity as registered representatives, Advisory Persons will receive commissions for the implementation of recommendations for commissionable transactions. Additional details are included in Item 10 above.

#### Insurance Agency Affiliations

Certain Advisory Persons of SilverLake are also licensed insurance professionals. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Additional details are included in Item 10 above.

### **B. Client Referrals from Solicitors**

SilverLake does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

---

SilverLake does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct SilverLake to utilize that custodian for the Client's security transactions. SilverLake encourages Clients to review statements provided by account custodian for accuracy.

The deduction of the Advisor's Investment Advisory Fee from the Client is considered custody of Client funds. To mitigate any conflict, the Advisor recommends LPL Financial as the qualified custodian. LPL calculated and deducts the Investment Advisory Fees on behalf of the Advisor and the Client pursuant to the Client's direct agreement with LPL. The Advisor does not have the authority to deduct any fees. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

---

SilverLake generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by SilverLake. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by SilverLake will be in accordance with each Client's investment objectives and goals.

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

---

SilverLake does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

---

Neither SilverLake, nor its management has any adverse financial situations that would reasonably impair the ability of SilverLake to meet all obligations to its Clients. Neither SilverLake, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. SilverLake is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## **Item 19 – Requirements for State Registered Advisors**

---

### **A. Educational Background and Business Experience of Principal Officers**

The owners of SilverLake include: Managing Partners, Richard J. Briand, Robert Eddy, Thomas Golonka, Theodore Rhiele, and Jeffrey Steele. Information regarding the formal education and background of each owner is included in Item 2 of Part 2B included below.

### **B. Other Business Activities of Principal Officers**

#### **Broker-Dealer Affiliation**

Advisory Persons of SilverLake are also registered representatives of LPL Financial, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In their separate capacity as registered representatives, Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons of SilverLake. Neither SilverLake nor its Advisory Persons will earn investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative where commissions are also earned.

Generally, recommendations made by SilverLake to its Clients are implemented by Advisory Persons in their role as Investment Advisor Representatives of SilverLake and not in their role as a Registered Representatives. As such, Clients of SilverLake only pay advisory fees as described above. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment.

#### **Insurance Agency Affiliations**

Certain Advisory Persons of SilverLake are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with the SilverLake. As insurance professionals, these Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

### **C. Performance Fee Calculations**

SilverLake does not charge performance-based fees for its investment advisory services. The fees charged by SilverLake are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

### **D. Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding SilverLake or its advisory persons.* Neither SilverLake nor its advisory persons has ever been involved in any regulatory, civil or criminal action. There have been no lawsuits, arbitration claims or administrative proceedings against SilverLake or its advisory persons. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding SilverLake or its advisory persons.*

### **E. Material Relationships with Issuers of Securities**

Neither SilverLake nor its advisory persons has any relationships or arrangements with issuers of securities.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Richard J. Briand  
Managing Partner**

**Effective: January 29, 2013**

This Brochure Supplement provides information about the background and qualifications of Richard J. Briand (CRD# **1045809**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake” or the “Advisor” - CRD #165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact us at (802) 857-5083.

Additional information about Mr. Briand is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

---

The Managing Partner of SilverLake is Richard J. Briand. Mr. Briand, born in 1955, is a dedicated Portfolio Manager for Client accounts of SilverLake. Mr. Briand earned a B.S. in Accounting from Bentley University in 1978. Additional information regarding Mr. Briand's employment history is included below.

### Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial	10/2012 to Present
Managing Partner, Wells Fargo Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	10/2005 to 05/2009
Financial Advisor, Wachovia Securities, LLC	05/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securities, Inc.	08/2000 to 06/2002

## Item 3 – Disciplinary Information

---

*There are no legal, civil or disciplinary events to disclose regarding Mr. Briand.* Mr. Briand has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Briand.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Briand.*

However, we do encourage you to independently view the background of Mr. Briand on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **1045809** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Briand is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Briand will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Briand. Neither the Advisor nor Mr. Briand will earn investment advisory fees in connection with any services implemented in Mr. Briand's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Briand earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Briand is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Briand may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Briand or the Advisor.

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

---

Mr. Briand has additional business activities where compensation is received. These business activities are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

### **Item 6 – Supervision**

---

Mr. Briand serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

---

Mr. Briand does not have any additional information to disclose.

## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Robert W. Eddy  
Managing Partner**

**Effective: January 29, 2013**

This Brochure Supplement provides information about the background and qualifications of Robert W. Eddy (CRD# 75378) in addition to the information contained in the SilverLake Wealth Management LLC ("SilverLake" or the "Advisor" CRD #165525) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or SilverLake's Disclosure Brochure, please contact us at (802) 857-5083.

Additional information about Robert W. Eddy is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

---

Robert W. Eddy is a Managing Partner of SilverLake Wealth Management LLC. Mr. Eddy, born in 1945, is dedicated to serving the Clients of SilverLake Wealth Management LLC. Mr. Eddy earned a Bachelor of Science from Ithaca College in 1967. Additional information regarding Mr. Eddy's employment history is included below.

### Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial	10/2012 to Present
Managing Partner, Wells Fargo Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network Inc.	06/2003 to 05/2009
Managing Partner, Wachovia Securities Financial Network LLC	06/2002 to 05/2003
Financial Advisor, Morgan Stanley DW	02/1978 to 04/2002

## Item 3 – Disciplinary Information

---

*There are no legal, civil or disciplinary events to disclose regarding Mr. Eddy.* Mr. Eddy has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Eddy.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Eddy.*

However, we do encourage you to independently view the background of Mr. Eddy on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 75378 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Eddy is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Eddy will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Eddy. Neither the Advisor nor Mr. Eddy will earn investment advisory fees in connection with any services implemented in Mr. Eddy's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Eddy earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Eddy, Managing Partner of SilverLake, is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Eddy may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Eddy or the Advisor.

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

---

Mr. Eddy has additional business activities where compensation is received. These business activities are detailed in Item 4 - Other Business Activities above.

### **Item 6 – Supervision**

---

Mr. Eddy serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steel, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

---

Mr. Eddy does not have any additional information to disclose.

## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Thomas Golonka, CFA, CFP®  
Managing Partner**

**Effective: January 29, 2013**

This Brochure Supplement provides information about the background and qualifications of Thomas Golonka, CFA, CFP® (CRD# 2209094) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake” or the “Advisor” CRD #165525) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact us at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Thomas Golonka is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

Thomas Golonka is a Managing Partner of SilverLake Wealth Management LLC. Mr. Golonka, born in 1967, is dedicated to serving the Clients of SilverLake Wealth Management LLC. Mr. Golonka earned an MBA from Union College in 1991 and a Bachelor of Arts from University of Notre Dame in 1989. Additional information regarding Mr. Golonka's employment history is included below.

### Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representatives, LPL Financial, LLC	10/2012 to Present
Managing Partner, Wells Fargo Advisors Financial Network LLC	5/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	10/2005 to 5/2009
Financial Advisor, Wachovia Securities, LLC	06/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	08/2000 to 05/2003

### Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "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 62,000 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, administered in 10 hours over a two-day period, 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.
- *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.

### Item 3 – Disciplinary Information

---

*There are no legal, civil or disciplinary events to disclose regarding Mr. Golonka.* Mr. Golonka has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Golonka.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Golonka.* However, we do encourage you to independently view the background of Mr. Golonka on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2209094** in the field labeled “Individual CRD Number”.

### Item 4 – Other Business Activities

---

#### Broker-Dealer Affiliation

Mr. Golonka is also a registered representative of LPL Financial LLC (“LPL”). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Golonka will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Golonka. Neither the Advisor nor Mr. Golonka will earn investment advisory fees in connection with any services implemented in Mr. Golonka’s separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Golonka earns a commission on an investment, the advisory fee will be waived by SilverLake.

#### Insurance Agency Affiliations

Mr. Golonka is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Golonka may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Golonka or the Advisor.

### Item 5 – Additional Compensation

---

Mr. Golonka has additional business activities were compensation is received. These business activities are detailed in Item 4 - Other Business Activities above.

### Item 6 – Supervision

---

Mr. Golonka serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### Item 7 – Requirements for State Registered Advisors

---

Mr. Golonka does not have any additional information to disclose.

## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Jeffrey D. Steele  
Managing Partner and Chief Compliance Officer**

**Effective: January 29, 2013**

This Brochure Supplement provides information about the background and qualifications of Jeffrey D. Steele (CRD# **2111373**) in addition to the information contained in the SilverLake Wealth Management LLC ("SilverLake" or the "Advisor" CRD #165525) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or SilverLake's Disclosure Brochure, please contact us at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Jeffrey D. Steele is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

---

Jeffrey D. Steele is a Managing Partner and Chief Compliance Officer of SilverLake Wealth Management LLC. Mr. Steele, born in 1967, is dedicated to serving the Clients of SilverLake Wealth Management LLC. Mr. Steele earned a B.A. in Economics from SUNY Cortland in 1989. Additional information regarding Mr. Steele's employment history is included below.

### Employment History:

Managing Partner & Chief Compliance Officer, SilverLake Wealth Management LLC	10/2012 to Present
Financial Advisor, LPL Financial, LLC	10/2012 to Present
Managing Partner, Wells Fargo Advisors Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network LLC	10/2005 to 05/2009
Financial Advisor, Wachovia Securities, LLC	06/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securities, Inc.	04/2002 to 06/2002
Financial Advisor, Dean Witter Reynolds, Inc.	10/1990 to 04/2002

## Item 3 – Disciplinary Information

---

*There are no legal, civil or disciplinary events to disclose regarding Mr. Steele.* Mr. Steele has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Steele.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Steele.* However, we do encourage you to independently view the background of Mr. Steele on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **2111373** in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Steele is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Steele will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Steele. Neither the Advisor nor Mr. Steele will earn investment advisory fees in connection with any services implemented in Mr. Steele's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Steele earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Steele is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Steele may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Steele or the Advisor.

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

---

Mr. Steele has additional business activities where compensation is received. These business activities are detailed in Item 4 - Other Business Activities above.

### **Item 6 – Supervision**

---

Mr. Steele serves as the Managing Partner and Chief Compliance Officer and Chief Compliance Officer of SilverLake. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

### **Item 7 – Requirements for State Registered Advisors**

---

Mr. Steele does not have any additional information to disclose.

# **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Theodore M. Riehle**  
**Managing Partner**

**Effective: January 29, 2013**

This Brochure Supplement provides information about the background and qualifications of Theodore M. Riehle (CRD# **1053690**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake” or the “Advisor” CRD #165525) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact us at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Theodore M. Riehle is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

---

Theodore M. Riehle is a Managing Partner of SilverLake Wealth Management LLC. Mr. Riehle, born in 1947, is dedicated to serving the Clients of SilverLake Wealth Management LLC. Mr. Riehle earned a Bachelor of Science from University of Vermont in 1970. Additional information regarding Mr. Riehle's employment history is included below.

### Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial, LLC	10/2012 to Present
Managing Partner, Wells Fargo Advisors Financial Network, LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	06/2003 to 05/2009
Managing Partner, Wachovia Securites Financial Network, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securites Financial Network, Inc.	03/2002 to 06/2002
Financial Advisor, Morgan Stanley	01/1995 to 03/2002

## Item 3 – Disciplinary Information

---

*There are no legal, civil or disciplinary events to disclose regarding Mr. Riehle.* Mr. Riehle has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Riehle.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Riehle.* However, we do encourage you to independently view the background of Mr. Riehle on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 1053690 in the field labeled "Individual CRD Number".

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Riehle is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Riehle will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Riehle. Neither the Advisor nor Mr. Riehle will earn investment advisory fees in connection with any services implemented in Mr. Riehle's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Riehle earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Riehle is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Riehle may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Riehle or the Advisor.

## Item 5 – Additional Compensation

---

Mr. Riehle has additional business activities where compensation is received. These business activities are detailed in Item 4 - Other Business Activities above.

## **Item 6 – Supervision**

---

Mr. Riehle serves as the Managing Partner and Chief Compliance Officer and Chief Compliance Officer of SilverLake. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Item 7 – Requirements for State Registered Advisors**

---

Mr. Riehle does not have any additional information to disclose.

## Privacy Policy

---

Effective: January 1, 2013

### Our Commitment to You

SilverLake Wealth Management LLC ("SilverLake") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. SilverLake (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

SilverLake does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

## How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none"><li>• Processing transactions;</li><li>• General account maintenance;</li><li>• Responding to regulators or legal investigations; and</li><li>• Credit reporting, etc.</li></ul>	SilverLake may share this information.	Clients cannot limit the Advisors ability to share.
<b>Administrators</b> We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	SilverLake may share this information.	Clients cannot limit the Advisors ability to share.
<b>Marketing Purposes</b> SilverLake does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where SilverLake or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	SilverLake does not share personal information.	Clients cannot limit the Advisors ability to share.
<b>Authorized Users</b> In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	SilverLake does share personal information.	Clients can limit the Advisors ability to share.
<b>Information About Former Clients</b> SilverLake does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	SilverLake does not share personal information regarding former clients	Clients can limit the Advisors ability to share.

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about SilverLake's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.

### Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### State specific regulations

Vermont

In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties we will only disclose your name, address, other contract information, and general information about our experience with you.

**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (802) 857-5083.