

**Item 1- Cover Page**

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This brochure provides information about the qualifications and business practices of Silver Lake Advisory. If you have any questions about the contents of this brochure, please contact us at: 801-733-9470, or by email at: [ronna@silverlakeadvisory.com](mailto:ronna@silverlakeadvisory.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.

*Silver Lake Advisory is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain and Adviser.*

Additional information about Silver Lake Advisory is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

May 28, 2017

## Item 2- Material Changes

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### Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### Full Brochure Available

Currently, our Brochure is available on the SEC website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov) and may also be requested by contacting Ronna Cohen at 801-733-9470 and/or [ronna@silverlakeadvisory.com](mailto:ronna@silverlakeadvisory.com).

Additional information about Silver Lake Advisory is also available via the SEC's website [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Silver Lake Advisory who are registered, or are required to be registered, as investment adviser representatives of Silver Lake Advisory.

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## **Item4- Advisory Business**

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### **Firm Description**

Silver Lake Advisory is an individual proprietorship owned and operated by Ronna Cohen, JD, MBA, since 1992. The purpose of the firm is to invest client funds and manage those funds.

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### **Types of Advisory Services**

Silver Lake Advisory primarily offers discretionary investment management services for our clients. Account management is guided by our client's risk tolerance; income needs, tax status, and stated investment objectives.

Ronna Cohen and Greg Bangma perform reviews of all accounts. Each account is monitored relative to each client's goals and objectives that are set at the time the account is established and may be modified from time to time as per the client's wishes.

If, as a result of a review, the reviewer concludes that changes in investments are warranted, the reviewer has discretion to initiate changes. Reviews are triggered by calendar year with a full review every quarter. Minor reviews are performed on an on-going basis and when changes in prices or client's goals and objectives occur.

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### **Tailored Relationships**

Clients may impose restrictions on investing in certain securities, types of securities, or sectors.

### **Assets Under Management**

As of May 28, 2017, we had \$188,600,000 in client assets managed on a discretionary basis. All accounts are held at Charles Schwab Institutional Services.

## Item 5- Fees and Compensation

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### Description

Silver Lake Advisory bases its fees on a percentage of assets under management. Fee Schedule:

1.0% of assets under management under \$5 million dollars in assets, except for charitable organizations.

0.8% for assets over \$5 million dollars, except for charitable organizations.

0.6% of assets under management under \$5 million dollars in assets for charitable organizations.

0.45% of assets under management over \$5 million dollars in assets for charitable organizations.

100% of compensation is from investment supervisory services.

Fees are *negotiable*.

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### Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from an account designated by the client to facilitate billing. The client must consent in advance to direct debiting of your investment account. Management fees debited during the calendar year are stated on your 1099 as provided by Schwab.

You can choose to have fees debited directly from retirement accounts, as long as the tax implication is understood by you and your accountant. Some clients prefer to be billed directly with no debits from an account.

In the event of termination, client will pay on a prorated basis up to the day of termination. This can be negotiated.

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### Other Fees

The firm may invest in mutual funds or exchange traded funds for its clients. However, if a portfolio holds mutual funds, exchange traded funds or money market funds, the

client may be paying two fees for the management of those assets, one to Silver Lake Advisory and one to the money market or mutual fund manager.

## **Item 6- Performance-Based Fees**

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Silver Lake Advisory does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

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

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Silver Lake Advisory provides portfolio management services to individuals, high net worth individuals, families, charitable institutions, foundations, and endowments.

### **Account Minimums**

Silver Lake Advisory does not have a minimum account size.

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

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Investing in securities involves risk of loss that clients should be prepared to bear.

## **Item 9- Disciplinary Information**

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### **Legal and Disciplinary**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Silver Lake Advisory or the integrity of Silver Lake Advisory's management. Silver Lake Advisory has had no disciplinary events.

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

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There are no other financial activities or affiliations.

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

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### **Code of Ethics**

Silver Lake Advisory has adopted a Code of Ethics describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. Employees (Ronna Cohen) and access persons (Greg Bangma and Nancy Elliott) of Silver Lake Advisory are required to acknowledge the terms of the Code of Ethics annually, or as amended.

Employees and access persons of Silver Lake Advisory may not use social media on behalf of, or in relation to, Silver Lake Advisory and may not mention Silver Lake Advisory in any social media. This policy does not prohibit any of the above individuals from utilizing social media for their own purposes outside of their activities on behalf of Silver Lake Advisory.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of possible employees and access persons of Silver Lake Advisory will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees and access persons to invest for their own accounts.

Access persons report their personal securities transactions quarterly and their personal securities holdings annually to the chief compliance officer.

Silver Lake Advisory does not invest in initial public offerings or private placements for its clients. Employees and access persons are also prohibited from investing in initial public offerings or private placements.

Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Ronna Cohen.

It is policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Silver Lake Advisory will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the



investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

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### **Participation or Interest in Client Transactions**

Silver Lake Advisory and related persons may buy or sell securities that are also held by clients. Related persons may not trade their own securities ahead of client trades. Related persons must comply with the provisions of the Silver Lake Advisory's *Compliance Manual*.

## **Item 12- Brokerage Practices**

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Silver Lake Advisory has client's full authority to buy and sell securities and does so. Silver Lake Advisory has client's full authority to determine the amount of securities to be bought and sold.

Silver Lake Advisory requires that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., (Schwab), a registered broker- dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Silver Lake Advisory is independently owned and operated and not affiliated with Schwab.

Silver Lake Advisory's clients' accounts are maintained in the custody of Schwab, which generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Silver Lake Advisory requires all transactions be placed with Schwab Institutional so as to take advantage of the client services and rapid executions available. All transactions are on a fully disclosed agency basis and at discounted commission rates. No sub-advisors are used.

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### **Soft Dollars**

Schwab Institutional may make available, and/or pay for various types of services rendered to Silver Lake Advisory by third parties. Currently Schwab provides access to third party investment research.

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## **Order Aggregation**

Silver Lake Advisory maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing Silver Lake Advisory the ability to purchase large blocks of securities, resulting in smaller transaction costs to the client.

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

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Reviews are triggered by calendar year with a full review every quarter. Minor reviews are performed on an on-going basis and when changes in prices or client's goals and objectives occur. Ronna Cohen and Greg Bangma perform all client reviews.

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

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Silver Lake Advisory does not receive, nor provide, compensation for referrals.

## **Item 15- Custody**

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Clients receive monthly statements from Schwab Institutional. Silver Lake Advisory urges clients to carefully review such statements and compare such official custodial records to the statements that we provide. Silver Lake Advisory statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Management fee deduction authority is the sole reason Silver Lake Advisory has custody and therefore does not need to disclose custody in its Form ADV.

## **Item 16- Investment Discretion**

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Silver Lake Advisory receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Such discretion is exercised in a manner consistent with the investment objectives for the particular client account.

When selecting securities and determining amounts, Silver Lake Advisory observes the

investment policies, limitations and restrictions of the clients for which it advises.

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

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All clients directly receive and vote proxies. At no time does Silver Lake Advisory receive Client proxies, nor does it have the authority to vote client proxies.

## **Item 18- Financial Information**

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Silver Lake Advisory has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## **Brochure Supplement (Part 2B of Form ADV)**

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### **Ronna Cohen, JD, MBA**

#### **Educational Background:**

- Date of birth: 1955
- Syracuse University School of Law, JD 1983
- Syracuse University Graduate School of Management, MBA 1983

#### **Business Experience:**

- Registered as Investment Advisor since 1992
- Broker, Moors & Cabot, Boston, MA, 2001-2005
- Broker, U.S. Securities International, NY, NY 1992-2001

Disciplinary Information: None  
Other Business Activities: None  
Additional Compensation: None

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**Greg Bangma, CMT**

4045 Bulrush Dr. N.W.  
Grand Rapids, MI 49534  
616-805-3748  
[greg@silverlakeadvisory.com](mailto:greg@silverlakeadvisory.com)

**Educational Background:**

- Date of birth: 1974
- BBA Finance, Grand Valley State University 1996
- MBA Finance, Grand Valley State University 2000

**Designations:**

**CMT – Chartered Market Technician**

The CMT Program is a certification process in which candidates are required to demonstrate proficiency in a broad range of technical analysis subjects. The Market Technicians Association's (MTA) Accreditation Committee is responsible for these exams. The program consists of three levels of exams testing the student's competency at each level. The exams are cumulative in scope. The first two levels are multiple-choice exams. The third level is an essay exam.

**MINIMUM REQUIREMENTS:**

- The CMT candidate is required to be either an MTA Member or MTA Affiliate continuously (dues paid) throughout the CMT process, and must agree to abide by the MTA Code of Ethics.
- While MTA Affiliates may enroll in and successfully complete the CMT Program, only full Members of the MTA will be awarded and permitted to use the CMT designation.
- Continuous MTA membership, upholding the MTA Code of Ethics, and such other requirements, as determined, from time to time, by the MTA Board of Directors.

Business Experience:

- Portfolio Manager, Silverhawk Capital 09/2008 to 05/2013
- Registered Rep, United Planners Financial Services 02/2011 to 05/2013
- Investment Advisor Rep, United Planners Financial Services 02/2011 to 08/2011
- Portfolio Manager, Maul Capital Management 01/2006 to 08/2008

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Ronna Cohen, Chief Compliance Officer, supervises Greg Bangma. She reviews Greg's work through frequent office interactions as well as remote interactions.

SUPERVISOR'S contact information:

801-733-9470

ronna@silverlakeadvisory.com