

SAFIRA WEALTH MANAGEMENT LLC

FIRM BROCHURE - FORM ADV PART 2A

This brochure (also known as Form ADV Part 2A) provides information about the qualifications and business practices of Safira Wealth Management LLC (hereinafter “Safira”). If you have any questions about the contents of this brochure, please contact us at +4179 827 5337 or by email at roberto@gwhisper.ch. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Safira is also available on the SEC’s website at www.adviserinfo.sec.gov. Safira’s CRD number is: 290142

Route de Frontenex 86bis
1208 Geneva, Switzerland
+4179 827 5337
roberto@gwhisper.ch

Registration does not imply a certain level of skill or training.

Version Date: 02.05.19

Item 2: Material Changes

The contact information and address have been changed due to a change in the location of Safira's principal place of business and the replacement of its chief compliance officer.

The ownership information has been changed to reflect that Vichia Capital LLC is now the sole owner of Safira.

Item 10 has been changed to reflect that, due to the changes in ownership of Safira, neither Safira nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes	i
Item 3: Table of Contents	ii
Item 4: Advisory Business	1
A. Description of the Advisory Firm.....	1
B. Financial Advisory Services.....	1
C. Client Tailored Services and Client Imposed Restrictions	2
D. Wrap Fee Programs.....	3
E. Amounts Under Management.....	3
Item 5: Fees and Compensation.....	3
A. Fee Schedule.....	3
B. Payment of Fees.....	4
C. Clients Are Responsible For Third Party Fees	4
D. Prepayment of Fees	4
E. Outside Compensation For the Sale of Securities to Clients.....	4
Item 6: Performance-Based Fees and Side-By-Side Management	4
Item 7: Types of Clients	5
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss	6
A. Investment Philosophy and Investment Strategies	6
B. Material Risks Involved	6
C. Risks of Specific Securities Utilized	8
Item 9: Disciplinary Information	9
A. Criminal or Civil Actions.....	9
B. Administrative Proceedings	9
C. Self-regulatory Organization (SRO) Proceedings	9
Item 10: Other Financial Industry Activities and Affiliations.....	9
A. Registration as a Broker/Dealer or Broker/Dealer Representative	9
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.....	9
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
A. Code of Ethics.....	9
B. Recommendations Involving Material Financial Interests	9
C. Investing Personal Money in the Same Securities as Clients.....	9
D. Trading Securities At/ Around the Same Time as Clients' Securities	9
Item 12: Brokerage Practices.....	11

A.	Factors Used to Select Custodians and/or Broker/Dealers	11
1.	Research and Other Soft-Dollar Benefits	11
2.	Brokerage for Client Referrals	12
3.	Clients Directing Which Broker/Dealer/Custodian to Use	12
B.	Aggregating (Block) Trading for Multiple Client Accounts	12
Item 13:	Reviews of Accounts	12
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	12
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts	12
C.	Content and Frequency of Regular Reports Provided to Clients	12
Item 14:	Client Referrals and Other Compensation	13
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)	13
B.	Compensation to Non – Advisory Personnel for Client Referrals	13
Item 15:	Custody	13
Item 16:	Investment Discretion	13
Item 17:	Voting Client Securities (Proxy Voting)	13
Item 18:	Financial Information	14
A.	Balance Sheet	14
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients	14
C.	Bankruptcy Petitions in Previous Ten Years	14

Item 4: Advisory Business

A. Description of the Advisory Firm

Safira Wealth Management LLC, a Delaware limited liability company ("Safira"), is an investment adviser registered with the United States Securities and Exchange Commission ("SEC") under the Investment Advisers Act of 1940 (the "Advisers Act"). Please note that registration with the SEC does not imply a certain level of skill or training. Safira was formed to serve individuals and high net worth individuals. Safira was established on September 1, 2017, and is wholly owned by Vichia Capital LLC.

B. Financial Advisory Services

Safira offers comprehensive portfolio management, financial planning and investment management services for a fee. We also provide non-discretionary investment management services on a limited basis. Clients pay us investment advisory fees based on fee schedules as described in Item 5 and also may pay us performance fees if the client's net worth or assets under management by us meet certain dollar thresholds. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Investment portfolios are built with carefully selected investments based on, among other things, the client's income, other cash flow considerations, liquidity considerations, tax considerations, risk tolerance, and time horizon.

Financial planning and investment advisory services include, but are not limited to, the following:

- Design and implementation of a comprehensive financial plan
- Custom Investment Policy Statement (IPS)
- Estate Planning
- Philanthropic objectives and implementation
- Asset allocation analysis
- Cash flow planning
- Portfolio construction
- Tax planning
- Retirement planning
- Security analysis
- Performance reporting

Safira evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Safira offers financial planning services for clients as requested by the client, which may include, but is not limited to: financial planning, tax considerations, investment analysis, insurance analysis, retirement planning, and estate planning. The content of the plan, frequency the plan is evaluated, presentation of the plan, and form of the presentation varies among clients.

Financial planning is an evaluation of a client's current and future financial state, using currently known variables to predict future cash flows, asset values and withdrawal plans. Plans are based on the client's individual situation and may include the client's current financial status, tax status, future goals, return objectives, and attitudes towards risk.

Services Limited to Specific Types of Investments

Safira does not limit its investment management services to any specific product or investment vehicle and may use, without limitation, mutual funds, stocks, bonds, exchange traded funds, closed end funds, futures, options, structured products, annuities, hedge funds, real estate investment trusts, and government securities. Because some types of investments involve certain additional degrees of risk, they will only be implemented when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Portfolio Management

Safira provides continuous advice to a client concerning the investment of the client's funds based on the client's individual needs and circumstances. Based on information learned from the client, we develop a personal investment policy for the client and manage a portfolio based on that policy. The policy considers the client's individual objectives, time horizon, risk tolerance, liquidity needs, prior investment history and personal situation.

C. Client Tailored Services and Client Imposed Restrictions

Safira provides investment management services in accordance with clients' investment guidelines. We accept investment restrictions from clients if the restrictions do not hinder our ability to execute our investment strategies. In some cases, we may provide investment guidance to clients on a non-discretionary basis with the client making final investment decisions.

D. Wrap Fee Programs

Safira does not participate in any wrap fee programs. A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees.

E. Amounts Under Management

As of February 05, 2019, Safira has no assets under management.

Item 5: Fees and Compensation

A. Fee Schedule

Total Assets Under Management	Annual Fee
≤ \$1 Million	1.00%
> \$1 Million and ≤ \$10 Million	1.00%
> \$10 Million	1.00%

Generally, we charge investment management fees based upon the above standard fee schedules. We negotiate fees with clients, and not all clients pay fees as described in the above schedule. Differences can arise for various reasons, including (i) account size; (ii) total assets under management for the client; (iii) inception date of the account; (iv) specialized services or arrangements; and (v) other reasons not listed. Also, we retain the discretion to reduce or fully waive fees on a client-by-client basis.

Fees are paid quarterly in arrears, and clients may terminate their contracts with 1 months' written notice.

Fees are charged in arrears, therefore no refund policy is necessary. Clients may terminate their contracts without penalty, for full refund, within seven business days of signing the advisory contract.

B. Payment of Fees

Payment of Investment Advisory Fees

Investment advisory fees are withdrawn directly from the client's accounts with prior client written authorization. Fees are paid quarterly in arrears.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Safira. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

Safira generally collects investment advisory fees in arrears and does not anticipate charging prepaid investment advisory fees.

In the event investment advisory fees are charged in advance and services have stopped, the amount refunded, if any, will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the monthly AUM fee by the number of days in the termination quarter).

E. Outside Compensation For the Sale of Securities to Clients

Neither Safira nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

Safira does accept performance-based fees, or fees based on a share of capital gains on or capital appreciation of the assets of a client, if the client's net worth or assets under management by us meet certain dollar thresholds. The terms of such fees are negotiable and may vary. All such arrangements are documented in writing and are made consistent with securities laws.

The nature of performance fees creates a potential conflict of interest between Safira, its associated persons, and clients. For example, such fees may cause Safira and its associated persons to engage in transactions or strategies that will increase the amount of the performance fees, but which may not increase the overall performance of the client's account. Additionally, Safira manages

accounts that are charged an asset-based fee. Managing both of these types of accounts at the same time creates an incentive to favor accounts for which a performance-based fee is received.

To minimize these conflicts of interest, Safira's performance fee is usually earned only when the account performance is positive and account performance exceeds an agreed-upon hurdle rate plus there is a high-water mark. In addition, we manage all accounts similarly despite the fee structure, given similar investment objectives.

A performance fee may also encourage Safira to make riskier and more speculative investments. To minimize this conflict of interest, Safira's performance-based fee schedule will usually include a base fee calculated on assets under management so that Safira's incentive to grow capital is appropriately balanced with an incentive to preserve capital.

Safira does not represent that the amount of the performance fees or the manner of calculating the performance fees is consistent with other performance-related fees charged by other investment advisers under the same or similar circumstances. The performance fees charged by Safira may be higher than the performance fees charged by other investment advisers for the same or similar services.

Item 7: Types of Clients

Safira generally provides management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High net worth individuals

Minimum Account Size

Safira recommends, but does not require, a minimum account size of \$1 Million. There is a minimum fee of \$10,000 per annum. Safira, at its discretion, may waive the minimum fee in certain circumstances.

(Rest of Page Intentionally Left Blank)

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

A. Investment Philosophy and Investment Strategies

Investment Philosophy

We seek to meet our clients' investment objectives after inflation and fees, while controlling for risk. After meeting our clients' objectives, we seek superior returns relative to the client's personal needs and market-based benchmarks.

Investment Strategies

Safira's main objective is simply to guide our clients towards reaching their financial goals, regardless of market conditions. We aim to create well diversified portfolios that will generate risk adjusted returns without too much exposure to any one market, sector, or security. We generally invest in equities, fixed income securities, funds, structured products, or options that may or may not include leverage. Safira may modify its strategy for each client depending on their goals, risk-tolerance, time horizon, and other limitations. We believe investors should be exposed to an appropriate mix of both passive and active strategies because some markets are more efficient than others, either inherently or due to current market conditions.

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

B. Material Risks Involved

- **Passive investment management:** The risk of passive investment management is that the investor will track the index in down markets, which could be detrimental to relative portfolio performance if professional money managers performed with less down market capture. There is also no smoothing of volatility relative to the index because the goal of passive management is to mirror the index and could potentially have more volatility than the index in its attempts to track it. Relying solely on this method could lead to poor performance.
- **Active investment management:** The risk of active investment management is that the portfolio manager underperforms the benchmark, adjusted for his/her

fees. The fees are usually higher in actively managed portfolios because there is a team of professional money managers analyzing potential investments in order to beat their benchmark. Relying solely on this method could lead to poor performance.

- **Cost Structure Analysis:** The risk in analyzing cost structures for efficient investment portfolios is that the investor seeks too much to lower costs, and ignores potential positive alpha to the detriment of portfolio performance. Relying solely on this method could lead to poor performance.
- **Fundamental Analysis:** This method seeks out underpriced/undervalued securities and markets. There is a risk that the price does not converge with perceived value. Relying solely on this method could lead to poor performance.
- **Technical Analysis:** This method attempts to predict future prices based on trend analysis in market and/or economic data. The risk is that prices do not follow the predicted pattern. Relying solely on this method could lead to poor performance.
- **Charting:** This method uses past data to analyze trends and to assist the investor in visualizing current market conditions. Past performance is not indicative of future performance. Relying solely on this method could lead to poor performance.
- **Tactical Opportunities:** The risk in entering investments on a tactical basis is that perceived temporary dislocations in prices extend longer than expected and/or become permanent adjustments in relative value.
- **Long-Term Purchases:** The risk in holding investments for a long period of time is that the investment fails to perform as expected.
- **Short-Term Purchases:** The risk in holding investments for a short period of time is that the investment does not perform to the level that covers the higher trading costs and higher tax level, due to short term capital gains taxes being higher than long term.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Past performance is not indicative of future performance. Safira does not represent, warrant, guarantee or imply that it can predict future performance or protect you against portfolio losses. Safira does not guarantee that you will meet your goals and does not imply that its services provide better returns than other investment strategies.

C. Risks of Specific Securities Utilized

Safira generally seeks investment strategies that do not involve significant or unusual risk. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

- **Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. There is also a risk that the investor will incur more than their fair share of tax liability in the fund depending on how the fund manages its tax liabilities and the timing of purchases and sales.
- **ETFs:** ETFs are designed typically to track an index or a specific benchmark, but there is risk that the fund will not track the index closely, and performance may suffer as a result.
- **Stocks:** Investing in stocks gives a much greater risk of short term losses, especially relative to fixed income securities or cash.
- **Fixed Income and Credit:** Credit investments are investments that makes fixed periodic payments in the future that may involve risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, among others.
- **Treasury Inflation Protected/Inflation Linked Bonds:** The risk of default on these bonds is dependent upon the U.S. Treasury defaulting; however, they carry a potential risk of losing share price value, albeit rather minimal.
- **Hedge Funds** are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.
- **REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.
- **Commodity and Precious Metal ETFs:** Investing in commodity and precious metal ETFs carries the risk of capital loss. There is no guarantee that the securities will closely track the underlying commodity, and unusual factors may affect pricing at times.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Safira nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Safira nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither Safira nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

A. Code of Ethics

Safira has adopted a code of ethics expressing the firm's commitment to ethical conduct. Safira's code of ethics describes the firm's fiduciary responsibilities to clients and details practices for reviewing the personal securities transactions of supervised persons with access to client information. It also requires compliance with applicable securities laws and addresses insider trading. Safira will provide any client or prospective client with a copy of Safira's code of ethics upon request.

B. Recommendations Involving Material Financial Interests

Because of our diverse financial services activities, Safira or its affiliates could have financial interests in various securities. We could thus recommend to our clients that they purchase or sell securities in which we have a financial interest, or in cases where we have investment discretion, we may purchase or sell those securities on behalf of our clients. This creates a conflict because we are incentivized to promote these securities over others.

To address this conflict of interest, we rely on various compliance controls, including, but not limited to: (i) maintaining a code of ethics that reinforces our fiduciary duty to clients; (ii) having written policies and procedures that clearly prescribe processes for employees when recommending or managing investments for our clients; (iii) using technological trading and compliance tools to monitor portfolio activities; and (iv) reviewing portfolios to ensure investments are consistent with clients' guidelines and restrictions.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Safira may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Safira to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Safira will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Safira may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Safira to buy or sell securities before or after recommending securities to clients, resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Safira will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

In the event that the client requests that Safira recommend a broker/ dealer/ custodian for execution and/or custodial services (exclusive of those clients that may direct the Safira to use a specific broker-dealer/ custodian), Safira generally recommends that investment management accounts be maintained where there are reasonable transaction fees, access to mutual funds and ETFs, and its overall platform for investors. Safira will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian.

1. Research and Other Soft-Dollar Benefits

Safira may receive research, products, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits"), and we may pay higher commissions to receive such research. Section 28(e) of the Securities Exchange Act of 1934 permits us to pay higher commissions if we can demonstrate the commissions are reasonable in relation to the research or brokerage services we receive.

Safira is incentivized to use commission dollars to purchase research instead of having to pay for the research out of its profits. Additionally, Safira is incentivized to select a broker-dealer based on its interest in receiving research or products or services, rather than on the clients' interest in receiving most favorable execution. To the extent Safira wishes to use commission dollars to purchase research, Safira must use the commission dollars generated from accounts that have granted discretion to us as to brokerage placement. Accordingly, commission dollars generated from accounts that grant brokerage placement discretion to Safira are likely to be used to purchase research that also benefits accounts that do not grant us discretion.

We do not use all products and services for the sole benefit of the clients whose commission dollars paid for the products and services. Research we obtain from commissions paid by one account is used to benefit all accounts. This creates conflicts because some clients get the benefit of research or services received due to another client's commission dollars.

Safira manages these conflicts as follows: (i) we review our soft dollar practices to determine in good faith that commissions used to acquire research products and services were reasonable in relation to the value of research or services received; (ii) we review commission rates relative to our peers; and (iii) we review products and services acquired by soft dollar commissions to assess their potential benefit to client accounts.

2. Brokerage for Client Referrals

Safira receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Safira allows clients to direct brokerage; however, Safira may recommend custodians. Safira may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage Safira may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

Safira maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing Safira the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Safira actively reviews clients' portfolios on a daily basis to confirm they are consistent with the particular investment strategy and risk management.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account, including assets held and asset value which will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Safira does not receive any economic benefit, directly or indirectly, from any third party for advice rendered to Safira clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

Safira does not, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Safira, with client written authority, has limited custody of client's assets through direct fee deduction of Safira's fees only. If the client chooses to be billed directly by the broker/dealer/custodian, Safira would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

For those client accounts where Safira will have investment discretion, the client has given Safira written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides Safira discretionary authority via a discretionary investment management clause in an investment advisory contract and/or a limited power of attorney clause in the contract between the client and the custodian. Clients may place any limitations on Safira's discretionary authority.

Item 17: Voting Client Securities (Proxy Voting)

Safira will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Safira does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Safira nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Safira has not been the subject of a bankruptcy petition in the last ten years.