

**Savior LLC**  
d/b/a  
**Savior Wealth**

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**ADV Part 2A, Firm Brochure**  
**Dated: August 6, 2019**

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**This Brochure provides information about the qualifications and business practices of Savior, LLC d/b/a Savior Wealth. If you have any questions about the contents of this Brochure, please contact us at (617) 699-8877 or [sandro@saviorwealth.com](mailto:sandro@saviorwealth.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.**

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

**References herein to Savior, LLC d/b/a Savior Wealth as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**

## Item 2           Material Changes

This is Savior, LLC d/b/a Savior Wealth's initial Form ADV Part 2A Firm Brochure.

**ANY QUESTIONS: Savior Wealth's Chief Compliance Officer, Sandro Gelfusa, remains available to address any questions that an existing or prospective client may have regarding this Brochure.**

## Item 3           Table of Contents

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents.....	2
Item 4	Advisory Business .....	3
Item 5	Fees and Compensation .....	7
Item 6	Performance-Based Fees and Side-by-Side Management .....	10
Item 7	Types of Clients.....	10
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	10
Item 9	Disciplinary Information .....	13
Item 10	Other Financial Industry Activities and Affiliations .....	13
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	14
Item 12	Brokerage Practices .....	15
Item 13	Review of Accounts.....	19
Item 14	Client Referrals and Other Compensation .....	19
Item 15	Custody.....	19
Item 16	Investment Discretion.....	20
Item 17	Voting Client Securities.....	20
Item 18	Financial Information .....	20

#### **Item 4            Advisory Business**

- A. Savior, LLC, which does business as Savior Wealth (“Savior Wealth”) is a Delaware Limited Liability Company formed on September 21, 2018. Savior Wealth became registered as an investment adviser on January 28, 2019. Savior Wealth is owned by Todd M. Ingwersen. Thomas Bartolomeo may conduct business using a separate DBA, Legacy Wealth Management Advisors, LLC. Jonathan Penta may conduct business using a separate DBA, Penta Wealth Management. Although each IAR of Savior Wealth is registered with, and subject to oversight and supervision by Savior Wealth, he may operate his businesses independently and work under a separate business name or “DBA”. As such, marketing materials provided to clients and potentials clients may include the DBA name and may include a logo associated with the DBA name. Savior Wealth continues to review and approve marketing materials related to the IAR or IA firm services offered and provided to clients.
- B. As discussed below, Savior Wealth offers clients investment advisory services and financial planning and consulting services when requested.

#### **INVESTMENT ADVISORY SERVICES**

The client can determine to engage Savior Wealth to provide discretionary investment advisory services. Typically, Savior Wealth provides services on a wrap fee basis, which means that the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, and custody). Prior to engaging Savior Wealth to provide investment advisory services, clients are required to enter into an Investment Advisory Agreement that contains the terms and conditions of the engagement.

To begin the investment advisory process, an investment adviser representative will first determine the client’s investment objectives and goals and then invest the client’s assets consistent with their objectives and goals. Once invested, Savior Wealth provides periodic monitoring and review of account performance and compares the account’s asset allocation with the client’s investment objectives. From time to time, Savior Wealth will rebalance the client’s account or buy and sell securities for the client’s account as it deems appropriate.

When requested by the client, financial planning and consulting services will generally be provided. In the event that the client requires extraordinary planning or consultation services, Savior Wealth may determine to charge for these additional services in its sole discretion. Prior to charging for these services, Savior Wealth will provide the client with a separate written notice listing the cost of these additional services.

#### **WRAP PROGRAM**

As discussed above, Savior Wealth typically provides investment advisory services on a wrap fee basis through the “Program”. The terms and conditions pertaining to the Program are discussed in the Wrap Fee Program Brochure, which is presented to all prospective Program participants. Under the Program, Savior Wealth offers investment advisory services, for a single specified annual Program fee, inclusive of trade execution, custody, reporting, and investment advisory fees. All prospective Program participants should read both this Brochure and the Wrap Fee Program Brochure, and ask any corresponding questions that they may have, prior to participation in the Program.

Because transaction fees and commissions are paid by Savior Wealth to the account custodian, Savior Wealth would typically have an economic incentive to minimize the number of trades in the client's account to maximize its own compensation, which presents a conflict of interest. To mitigate this conflict of interest, Savior Wealth maintains an asset-based pricing arrangement with the Wrap Fee Program custodian. In an asset based pricing arrangement, the amount charged for transactions effected for a client's account is a fixed percentage based upon the market value of the client's account. Therefore, Savior Wealth's trading activity is dictated by its clients' needs and anticipated market conditions, as opposed to transaction fee costs absorbed by Savior Wealth.

The Adviser does not have a minimum portfolio asset value size requirement for participation in the Wrap Program but, in its discretion, may establish one in the future.

Participation in a wrap program may cost the client more or less than purchasing these services separately. When managing a client's account on a wrap fee basis, Savior Wealth receives the balance of the Program fee after all other costs incorporated into the wrap fee have been deducted. The terms and conditions of a wrap program engagement are more fully discussed in Savior Wealth's Wrap Fee Program Brochure.

### **PROPHET EDGE ONLINE PORTFOLIOS**

Clients may choose to engage Savior Wealth to provide investment management services utilizing the Institutional Intelligent Portfolios® Program, relative to investment accounts with market values of at least \$5,000 under the Prophet Edge Online Program ("Prophet Edge"). The Institutional Intelligent Portfolios® Program is an automated investment program through which clients are invested in a range of investment strategies Savior Wealth has constructed and manages, each consisting of a portfolio of exchange traded funds ("ETFs") and a cash allocation. The client may instruct Savior Wealth to exclude up to three ETFs from their portfolio. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co"). Savior Wealth uses the Institutional Intelligent Portfolios® platform ("Platform"), offered by Schwab Performance Technologies ("SPT"), a software provider to independent investment advisors and an affiliate of CS&Co., to operate Prophet Edge. Savior Wealth is independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (collectively, "Schwab"). Savior Wealth, and not Schwab, is the client's investment adviser and primary point of contact with respect to Prophet Edge. As between Savior Wealth and Schwab, Savior Wealth is solely responsible, and Schwab is not responsible, for determining the appropriateness of Prophet Edge for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. Savior Wealth has contracted with SPT to provide Savior Wealth with the Platform, which consists of technology and related trading and account management services for Prophet Edge. The Platform enables Savior Wealth to make Prophet Edge available to clients online and includes a system that automates certain key parts of its investment process (the "System"). The System includes an online questionnaire that helps Savior Wealth determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that Savior Wealth will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but Savior Wealth then makes the final decision and selects a portfolio based on all the information it has about the client. The System also includes an automated investment engine through which Savior Wealth manages the client's portfolio on an

ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

Savior Wealth charges clients a fee for its services as described below under Item 5, Fees and Compensation. Savior Wealth's fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to Schwab as part of Prophet Edge. Schwab does receive other revenues in connection with Prophet Edge, which are described below under Item 5.

Savior Wealth does not pay SPT fees for the Platform so long as it maintains \$100 million in client assets in accounts at CS&Co that are not enrolled in Prophet Edge. If Savior Wealth does not meet this condition, then it must pay SPT an annual licensing fee of 0.10% of the value of its clients' assets in Prophet Edge. This arrangement presents a **conflict of interest**, as it provides an incentive for Savior Wealth to recommend that clients maintain their accounts at Schwab Notwithstanding, Savior Wealth may generally recommend to its clients that investment management accounts be maintained at CS&Co based on the considerations discussed in Item 12 below, which mitigates this conflict of interest.

Clients enrolled in Prophet Edge are limited in the universe of investment options available to them. For example, the investment options available are limited to ETFs, whereas Savior Wealth recommends various other types of securities in its other services. Prophet Edge is designed to provide guidance and professional assistance to individuals who are beginning the process of accumulating wealth. Clients will have access to their accounts and a financial interface online but will also have the opportunity to confer with Savior Wealth with respect to their account.

### **Rebalancing**

The System will rebalance a client's account periodically by generating instructions to CS&Co to buy and sell shares of ETFs and depositing or withdrawing funds through the "Sweep Program", considering the asset allocation for the client's investment strategy. Rebalancing trade instructions can be generated by the System when (i) the percentage allocation of an ETF varies by a set parameter established by Savior Wealth, (ii) Savior Wealth decides to change the ETFs or their percentage allocations for an investment strategy or (iii) Savior Wealth decides to change a client's investment strategy, which could occur, for example, when a client makes changes to their investment profile or imposes or modifies restrictions on the management of their account. Accounts below \$5,000 may deviate farther than the set parameters as well as the target allocation of the selected investment profile. Rebalancing below \$5,000 may impact the ability to maintain positions in selected asset classes due to the inability to buy or sell at least one share of an ETF. For example, withdrawal requests may require entire asset classes to be liquidated to generate and disburse the requested cash.

### **Sweep Program**

Each investment strategy involves a cash allocation ("Cash Allocation") that will be held in a sweep program at Charles Schwab Bank (the "Sweep Program"). The Cash allocation will be a minimum of 4% of an account's value to be held in cash, and may be higher, depending on the investment strategy chosen for a client. The Cash Allocation will be accomplished through enrollment in the Sweep Program, a program sponsored by Schwab. By enrolling in Prophet Edge, clients consent to having the free credit balances in their brokerage accounts at CS&Co swept into deposit accounts ("Deposit Accounts") at Charles Schwab Bank ("Schwab Bank") through the Sweep Program. Schwab Bank is an FDIC-

insured depository institution that is a Schwab affiliate. The Sweep Program is a required feature of Prophet Edge. If the Deposit Account balances exceed the Cash Allocation for a client's investment strategy, the excess over the rebalancing parameter will be used to purchase securities as part of rebalancing. If clients request cash withdrawals from their accounts, this likely will require the sale of ETF positions in their accounts to bring their Cash Allocation in line with the target allocation for their chosen investment strategy. If those clients have taxable accounts, those sales may generate capital gains (or losses) for tax purposes. In accordance with an agreement with CS&Co, Schwab Bank has agreed to pay an interest rate to depositors participating in the Sweep Program that will be determined by reference to an index.

### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent requested by a client, Savior Wealth may provide financial planning or consulting services on a stand-alone basis. The fees for these services are outlined in Item 5 below. Savior Wealth may provide advice on investment or non-investment matters, such as estate planning or insurance planning. Prior to rendering services, clients are required to enter into a Financial Planning and Consulting Agreement that contains the terms and conditions of the engagement.

If requested, Savior Wealth may recommend the services of other professionals so that the client can implement their plan, including certain employees of Savior Wealth (See disclosures at Item 10.C below regarding certain employee's registration with Purshe Kaplan Sterling Investments). The client is under no obligation to engage any recommended professional. The client retains discretion over all implementation decisions and is free to accept or reject any recommendation from Savior Wealth. If the client engages any unaffiliated professional, and a dispute arises, the client agrees to seek recourse exclusively from and against the engaged professional. It remains the client's responsibility to promptly notify Savior Wealth if there is ever any change in their financial situation or investment objectives so that it can review, and if necessary, revise its previous recommendations.

### **MISCELLANEOUS**

**Limitations of Financial Planning and Consulting.** To the extent requested by a client, Savior Wealth may provide financial planning and related consulting services regarding non-investment related matters, such as estate, tax and insurance planning. Savior Wealth does not serve as a law firm, accounting firm, or insurance agency, and no portion of its services should be construed as legal, accounting, or insurance implementation services. Accordingly, Savior Wealth does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, Savior Wealth may recommend the services of other professionals for certain non-investment implementation purposes, including certain of Savior Wealth's owners or employees (e.g., attorneys, accountants, insurance agents.). Some of these professionals may be affiliated with Savior Wealth. (See disclosures at Item 10.C below regarding certain employee's registration with Purshe Kaplan Sterling Investments). Clients are reminded that they are under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation made by Savior Wealth or its representatives. If the client engages any unaffiliated recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from and against the engaged professional.

**Retirement Rollovers.** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer’s plan, if permitted, (ii) roll over the assets to the new employer’s plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account (“IRA”), or (iv) cash out the account value (which could, depending upon the client’s age, result in adverse tax consequences). If Savior Wealth recommends that a client roll over their retirement plan assets into an account to be managed by Savior Wealth, such a recommendation creates a conflict of interest if Savior Wealth will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, Savior Wealth serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. No client is under any obligation to roll over retirement plan assets to an account managed by Savior Wealth.

**Client Obligations.** In performing its services, Savior Wealth shall not be required to verify any information received from the client or from the client’s other professionals, and is expressly authorized to rely on the information in its possession. Clients are responsible for promptly notifying Savior Wealth if there is ever any change in their financial situation or investment objectives so that Savior Wealth can review, and if necessary, revise its previous recommendations or services.

- C. Please see Item 4.B for a discussion on how Savior Wealth tailors its services to the individual needs of clients. Clients may impose reasonable restrictions on Savior Wealth’s services, including limiting specific securities or types of securities used by Savior Wealth, by notifying their adviser of those restrictions in writing.
- D. Savior Wealth participates in a wrap fee program and there is very little, if any difference, in the way that Savior Wealth manages wrap fee program accounts and non-wrap fee program accounts. Please see Item 4.B for more information about Savior Wealth’s services.
- E. As of June 4, 2019, Savior Wealth had \$150,738,362 in assets under management on a discretionary basis and \$2,346,158 on a non-discretionary basis.

## **Item 5 Fees and Compensation**

A.

### **INVESTMENT ADVISORY SERVICES**

Savior Wealth’s annual fee for investment advisory services is based upon a percentage of the market value placed under Savior Wealth’s management as follows:

<b><u>Market Value of Portfolio</u></b>	<b><u>Annual Fee %</u></b>
Up to \$4,999,999	1.50%
From \$5,000,000 - \$9,999,999	1.25%
Over \$10,000,000	1.00%

Advisory fees are negotiable and Savior Wealth may determine to waive or reduce its fee for any reason, including but not limited to anticipated future earnings capacity, the amount of assets to be managed by Savior Wealth or anticipated future assets to be managed by Savior Wealth, related accounts, and account composition.

Savior Wealth's investment advisory fee is prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. Unless otherwise agreed to, Savior Wealth charges its fee on cash and cash equivalents.

Savior Wealth's Program fees are outlined in the Wrap Fee Program Brochure.

### **PROPHET EDGE ONLINE PORTFOLIOS**

When consistent with a client's investment objectives, the Registrant may provide portfolio management services through an automated, online investment management platform. Through the Program, the Registrant offers clients a range of investment strategies it has constructed and manages each consisting of a portfolio of exchange traded funds ("ETFs") and a cash allocation. The Registrant's investment management fee for Program accounts shall be calculated as a percentage of the market value of the assets placed under Registrant's management as follows:

<b><u>Market Value of Portfolio</u></b>	<b><u>Annual Fee %</u></b>
Up to \$25,000	1.00%
From \$25,000 - \$100,000	0.90%
From \$100,000 - \$500,000	0.80%
From \$500,000 - \$1,000,000	0.70%
Above \$1,000,000	0.60%

As described above, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co as part of the Virtual Portfolios. Schwab does receive other revenues in connection with the Virtual Portfolios. Specifically, Schwab Bank® earns interest revenue on the cash in Virtual Portfolios accounts. Also, Schwab affiliates can earn revenue from the underlying assets in Virtual Portfolios accounts. This revenue comes from managing Schwab ETFs™ and providing services relating to third-party ETFs that the Registrant may select for the portfolios. Finally, Schwab may receive payments from the trading firms and exchanges where ETF trades are routed for execution.

### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent requested by a client, Savior Wealth may provide financial planning or consulting services on a stand-alone basis. Savior Wealth may provide advice on investment or non-investment matters, such as estate planning or insurance planning.

Savior Wealth's planning and consulting fees are negotiable, but generally range from \$2,500 to \$50,000 on a fixed fee basis and are payable half in advance and half on presentation.

- B. Clients generally will agree to have Savior Wealth's advisory fees deducted from their custodial account. Both Savior Wealth's Investment Advisory Agreement and the custodial agreement generally authorize the custodian to charge the client's account for the amount of Savior Wealth's investment advisory fee and to pay the fee to Savior Wealth. In the limited event that Savior Wealth agrees to bill the client directly, payment is due upon receipt of Savior Wealth's invoice.
- C. Savior Wealth may recommend that clients use the brokerage, clearing and/or custodial services of a particular broker-dealer for investment management accounts. Savior Wealth



may only implement its investment management decisions after the client has arranged for and furnished Savior Wealth with all information and authorization regarding accounts with the appropriate broker-dealer or custodian. Clients may incur certain charges imposed by the broker-dealer or custodian and other third parties such as custodial fees, charges imposed directly by a mutual fund or ETF, which are disclosed in a fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees.

- D. The Investment Advisory Agreement between Savior Wealth and the client will continue in effect until terminated by either party by written notice. When terminated, Savior Wealth will calculate the pro-rated unearned advisory fee and return it to the client. Savior Wealth will send the terminated client an invoice showing the calculation.
- E. **Securities Commission Transactions.** In the event that the client desires, the client can engage certain people affiliated with Savior Wealth, in their individual capacity, as a registered representative of Purshe Kaplan Sterling Investments ("PKS"), an SEC registered and FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through PKS, PKS will charge brokerage commissions to effect securities transactions, a portion of which commissions PKS shall pay to people affiliated with Savior Wealth, as applicable. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers. In addition, PKS and these individuals, may be eligible to receive ongoing, trailing compensation from mutual fund companies or other investment sponsors.
  - 1. The recommendation that a client purchase a commission product from PKS presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Savior Wealth's representative.
  - 2. Clients may purchase investment products recommended by Savior Wealth or its representatives through other, non-affiliated agents and their broker-dealers.
  - 3. Savior Wealth does not receive more than 50% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products that it recommends to its clients.
  - 4. When Savior Wealth representatives sell an investment product on a commission basis, Savior Wealth does not charge an advisory fee in addition to the commissions paid by the client for such product and vice versa. In no event will Savior Wealth receive dual compensation—it or its representatives will only receive commission compensation or advisory fees for providing investment advice on a specific security or transaction.

## **Item 6            Performance-Based Fees and Side-by-Side Management**

Neither Savior Wealth nor any supervised person of Savior Wealth accepts performance-based fees.

## **Item 7            Types of Clients**

Savior Wealth's clients generally include individuals and high net worth individuals.

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

A. Savior Wealth may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Savior Wealth may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

Investing in securities involves risk of loss that clients should be prepared to bear, including the loss of principal investment. Past performance may not be indicative of future results. Different types of investments involve varying degrees of risk.

B. Savior Wealth's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis Savior Wealth must have access to current/new market information. Savior Wealth has no control over the dissemination rate of market information; therefore, unbeknownst to Savior Wealth, certain analyses may be compiled with outdated market information, severely limiting the value of Savior Wealth's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Savior Wealth's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an

investment strategy that requires the purchase and sale of securities within a thirty (30) day investment period involves a very short investment period but will incur higher transaction costs when compared to a short-term investment strategy and substantially higher transaction costs than a longer-term investment strategy.

- C. Security Specific Risks. Below are some of the material risks of investing through Savior Wealth. The material risks set forth below are qualified in their entirety by the more detailed risk disclosure in the applicable security or fund offering documents.

**Credit Risk:** Issuers may not make interest or principal payments on securities, resulting in losses to a client. In addition, the credit quality of securities held by a client may be lowered if an issuer's financial condition changes, including the U.S. government.

**Emerging Market Risk:** Emerging market countries may have relatively unstable governments, weaker economies and less-developed legal systems with fewer security holder rights. Emerging market economies may be based on only a few industries and security issuers may be more susceptible to economic weakness and more likely to default. Emerging market securities also tend to be less liquid.

**Equity Securities Risk:** Equity securities are susceptible to general stock market fluctuations and to volatile increases and decreases in value. This may occur because of factors affecting securities markets generally, or the equity securities of a particular company, capitalization, region, or sector.

**Fixed Income Risk:** A client may invest in fixed income securities, directly or through ETFs. The credit quality rating of securities may be lowered if an issuer's financial condition deteriorates and issuers may default on their interest and/or principal payments. Typically, a rise in interest rates causes a decline in the value of fixed income securities.

**Investment in Investment Companies Risk:** Investing in investment companies, including ETFs, subjects the Firm's strategies to those risks affecting the investment company, including the possibility that the value of the underlying securities held by the investment company could decrease. Moreover, investors in investment companies will incur their pro rata share of the expenses of the underlying investment companies' expenses. As a result, the cost of investing in investment companies through Savior Wealth will generally be higher than the cost of investing directly in ETFs or other investment companies.

**Leverage Risk:** Leverage may be used in investment and trading, generally through purchasing inherently leveraged instruments such as ETFs. The prices of leveraged instruments can be highly volatile, and investments in leveraged instruments may, under certain circumstances, result in losses that exceed the amounts invested. Borrowing magnifies the potential for losses and exposes the client to interest expense on money borrowed. Leveraged ETFs will amplify losses because they are designed to produce returns that are a multiple of the equity index to which they are designed to track.

**Leveraged ETF Risk:** Leveraged ETFs will amplify gains and losses. Most leveraged ETFs "reset" daily. Due to the effect of compounding, their performance over longer periods of time can differ significantly from the performance of their underlying index or benchmark during the same period of time

**Market Risk:** Overall equity and fixed income securities market risks affect the value of a client's portfolio. Factors such as domestic economic growth and market conditions, interest rate levels and political events affect the securities markets.

**Use of Mutual Funds and Exchange Traded Funds:** Most mutual funds and exchange traded funds are available directly to the public. A prospective client can obtain many of the funds that may be used by Savior Wealth without engaging Savior Wealth as an investment adviser. However, if a prospective client or client determines to do so, they will not receive Savior Wealth's initial and ongoing investment advisory services.

**Small and Medium Capitalization Stock Risk:** A client may invest directly or through ETFs in companies of any size capitalization. The price of small or medium capitalization company stocks may be subject to more abrupt or erratic market movements than larger, more established companies or the market averages in general.

### **Prophet Edge Online Portfolios**

Savior Wealth may, through its Prophet Edge Program, allocate investment management assets of its client accounts, on a discretionary basis, among one or more asset allocation programs as designated on the Investment Advisory Agreement. Prophet Edge asset allocation strategies have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs, such as Savior Wealth's asset allocation programs, with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is applicable to Savior Wealth's management of client assets through Prophet Edge:

1. Initial Interview – at the opening of the account, Savior Wealth, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment - the account is managed on the basis of the client's financial situation and investment objectives;
3. Quarterly Notice – at least quarterly Savior Wealth shall notify the client to advise Savior Wealth whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
4. Annual Contact – at least annually, Savior Wealth shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
5. Consultation Available – Savior Wealth shall be reasonably available to consult with the client relative to the status of the account;
6. Quarterly Report – the client shall be provided with a quarterly report for the account for the preceding period;
7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Savior Wealth not to purchase certain mutual funds;
8. No Pooling – the client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;
9. Separate Account - a separate account is maintained for the client with the Custodian;

10. Ownership – each client retains indicia of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

#### Risks Specific to Prophet Edge

ETFs in which the strategy may invest involve certain inherent risks generally associated with investments in a portfolio of securities, including the risk that the general level of security prices may decline, thereby adversely affecting the value of each unit of the ETF. Moreover, an ETF may not fully replicate the performance of its benchmark index because of the temporary unavailability of certain index securities in the secondary market or discrepancies between the ETF and the index with respect to the weighting of securities or the number of securities held. ETFs in which the strategies invest have their own fees and expenses as set forth in the ETF prospectuses. ETFs may have exposure to derivative instruments, such as futures contracts, forward contracts, options, and swaps. There is a risk that a derivative may not perform as expected. The main risk with derivatives is that some types can amplify a gain or loss, potentially earning or losing substantially more money than the actual cost of the derivative, or that the counterparty may fail to honor its contract terms, causing a loss for the ETF. Use of these instruments may also involve certain costs and risks such as liquidity risk, interest rate risk, market risk, credit risk, management risk, and the risk that an ETF could not close out a position when it would be most advantageous to do so. Some ETFs available, including Schwab ETFs™, are less than 10 years old. Accordingly, there is limited data available to use when assessing the investment risk of some of these ETFs. As a result, one or more of the following may occur: (i) poor liquidity in or limited availability of the ETFs, or (ii) lack of market depth causing the ETFs to trade at excessive premiums or discounts.

### **Item 9           Disciplinary Information**

Savior Wealth has not been the subject of any disciplinary actions.

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

**Registered Representative of PKS.** As disclosed above in Item 5.E, Savior Wealth's owner and employees are registered representative of PKS, an SEC registered broker dealer and FINRA member. Clients can choose to engage these representatives, in their individual capacities, to effect securities brokerage transactions on a commission basis. The recommendation by these representatives, that a client purchase a securities commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from him or through PKS. Clients are reminded that they may purchase securities products recommended by Savior Wealth's representatives through other, non-affiliated registered representatives.

**Licensed Insurance Agents.** Savior Wealth's owner and certain of its representatives, in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage these individuals to effect insurance transactions on a commission basis. The recommendation that a client purchase an insurance commission product presents a conflict of interest, as

the receipt of commissions provides an incentive to recommend insurance products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Savior Wealth's representatives. Clients are reminded that they may purchase insurance products recommended by Savior Wealth through other, nonaffiliated licensed insurance agents.

Savior Wealth's Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding these conflicts of interest.

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

- A. The Savior Wealth Code of Ethics ("Code") has been adopted by Savior Wealth and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act").

This Code establishes rules of conduct for all employees of Savior Wealth and is designed to, among other things; govern personal securities trading activities in the accounts of employees, their immediate family/household accounts and accounts in which an employee has a beneficial interest. The Code is based upon the principle that Savior Wealth and its employees owe a fiduciary duty to Savior Wealth's clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards maintained by Savior Wealth continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The reputation of Savior Wealth continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both Savior Wealth and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that the Savior Wealth has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

A full copy of the Savior Wealth Code of Ethics can be requested by contacting the CCO, Sandro Gelfusa at [sandro@saviorwealth.com](mailto:sandro@saviorwealth.com).

In accordance with Section 204A of the Investment Advisers Act of 1940, Savior Wealth also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Savior Wealth or any person associated with Savior Wealth.

- B. Neither Savior Wealth nor any related person of Savior Wealth recommends, buys, or sells for client accounts, securities in which Savior Wealth or any related person of Savior Wealth has a material financial interest.

- C. Savior Wealth and/or representatives of Savior Wealth are permitted to buy or sell securities that are also recommended to clients. This practice may create a situation where Savior Wealth and/or representatives of Savior Wealth are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Savior Wealth did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of Savior Wealth’s clients) and other potentially abusive practices.

Savior Wealth has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Savior Wealth’s “Access Persons”. Savior Wealth’s securities transaction policy requires that an Access Person of Savior Wealth must provide the Chief Compliance Officer, or his/her designee, with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person’s current securities holdings at least once each twelve (12) month period on a date Savior Wealth selects.

- D. Savior Wealth and/or representatives of Savior Wealth may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Savior Wealth and/or representatives of Savior Wealth are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11.C, Savior Wealth has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Savior Wealth’s Access Persons.

## **Item 12 Brokerage Practices**

- A. In the event that the client requests that Savior Wealth recommend a broker-dealer or custodian for execution and/or custodial services, Savior Wealth generally recommends that investment management accounts be maintained at Charles Schwab & Co. (“Schwab”). Prior to engaging Savior Wealth to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Savior Wealth and a separate custodial or clearing agreement with Schwab or another broker-dealer or custodian.

Factors that Savior Wealth considers in recommending *Schwab* include historical relationship with Savior Wealth and its owners, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and transaction fees paid by Savior Wealth’s clients comply with Savior Wealth’s duty to seek best execution, a client may pay a commission that is higher than another broker-dealer might charge to effect the same transaction where Savior Wealth determines, in good faith, that the commission or transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness.

Accordingly, although Savior Wealth will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Except for Program accounts, the brokerage commissions or transaction fees charged by the designated broker-dealer or custodian are in addition to, Savior Wealth's investment management fee.

1. Non-Soft Dollar Research and Additional Benefits.

Savior Wealth receives from Schwab (and potentially other investment platforms, unaffiliated investment managers, vendors, or fund sponsors) free or discounted support services and products. Certain of these products and services assist Savior Wealth to better monitor and service client accounts maintained at these institutions. The support services that Savior Wealth obtains can include investment-related research; pricing information and market data; compliance or practice management-related publications; discounted or free attendance at conferences, educational or social events; or other products used by Savior Wealth to further its investment management business operations.

Certain of the support services or products received may assist Savior Wealth in managing and administering client accounts. Others do not directly provide this assistance, but rather assist Savior Wealth to manage and further develop its business enterprise.

Savior Wealth's clients do not pay more for investment transactions effected or assets maintained at broker-dealers and custodians because of these arrangements. There is no corresponding commitment made by Savior Wealth to Schwab or any broker-dealer or custodian or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products because of the above arrangements.

Savior Wealth's Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the above arrangement and the conflict of interest such arrangement creates.

**Brokerage Practices Under Prophet Edge**

Client accounts enrolled in Prophet Edge are maintained at, and receive the brokerage services of, Schwab, a broker-dealer registered with the SEC and a FINRA/SIPC member. While clients are required to use Schwab as custodian/broker to enroll in Prophet Edge, the client decides whether to do so and opens its account with Schwab by entering into a brokerage account agreement directly with Schwab. Savior Wealth does not open the account for the client. If the client does not wish to place his or her assets with Schwab, then Savior Wealth cannot manage the client's account through Prophet Edge. Schwab may aggregate purchase and sale orders for ETFs across accounts enrolled in Prophet Edge, including both accounts for Savior Wealth's clients and accounts for clients of other independent investment advisory firms using the Platform.

**Schwab Advisor Services**

Schwab Advisor Services™ (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide Savior



Wealth and its clients with access to its institutional brokerage –trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer Savior Wealth’s client accounts while others help Savior Wealth to manage and grow its business. Schwab also provides monetary assistance to Savior Wealth to defray certain costs related be towards technology, compliance, legal, business consulting and other related expenses.

#### Services that Benefit the Client

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which Savior Wealth might not otherwise have access or that would require a significantly higher minimum initial investment by Savior Wealth’s clients. Schwab’s services described in this paragraph generally benefit the clients and the clients’ accounts.

#### Services that May Not Directly Benefit the Client

Schwab also makes available to Savior Wealth other products and services that benefit Savior Wealth but may not directly benefit clients or their accounts. These products and services assist Savior Wealth in managing and administering its clients’ accounts. They include investment research (both Schwab’s own and that of third parties). Savior Wealth may use this research to service all or some substantial number of Savior Wealth’s client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of Savior Wealth’s fees from its clients’ accounts; and
- assist with back-office functions, recordkeeping and client reporting.

#### Services that Generally Benefit Only Savior Wealth

Schwab also offers other services intended to help Savior Wealth manage and further develop its business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to Savior Wealth. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third

party's fees. Schwab may also provide Savior Wealth with other benefits such as occasional business entertainment of its personnel.

**Additional Benefits.** Savior Wealth has entered into an agreement with Schwab governing the receipt of certain additional benefits (the "Additional Benefits"), which Additional Benefits may or may not be offered to Savior Wealth again in the future. Specifically, Schwab has agreed to reimburse Savior Wealth for certain research, technology, and marketing expenses, up to a maximum of \$60,000, based on the amount of assets placed under Schwab's custody in accordance with the below schedule:

<u>Assets Custodied with Schwab</u>	<u>Additional Benefit Amount</u>
\$25,000,000	\$15,000
\$75,000,000	\$15,000
\$150,000,000	\$15,000
\$200,000,000	\$15,000

Savior Wealth has no expectation that these Additional Benefits will be offered again; however, Savior Wealth reserves the right to negotiate for these Additional Benefits in the future. Schwab provides the Additional Benefits to Savior Wealth in its sole discretion and at its own expense, and neither Savior Wealth nor its clients pay any fees to Schwab for the Additional Benefits. The Additional Benefits are generally provided on an unsolicited basis.

The recommendation by Savior Wealth or its representatives that a client select Schwab as designated broker-dealer/custodian for their accounts or transfer their account assets from another broker-dealer/custodian to Schwab presents a conflict of interest, because Savior Wealth has the incentive to make such a recommendation based on its interest in receiving or increasing the value of the Additional Benefits, rather than basing such recommendation on clients' best interest. To mitigate this conflict of interest, Savior Wealth will only recommend that a client select Schwab as broker-dealer/custodian if it reasonably believes that the arrangement in the best interests of its clients. **Savior Wealth's Chief Compliance Officer, Sandro Gelfusa, remains available to address any questions that a client or prospective client may have regarding this conflict of interest.**

2. Savior Wealth does not receive referrals from broker-dealers.
3. Savior Wealth does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Savior Wealth will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Savior Wealth. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs Savior Wealth to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions

or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Savior Wealth. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

- B. Transactions effected for each client account will be effected independently, unless Savior Wealth decides to purchase or sell the same securities for several clients at approximately the same time. Savior Wealth may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Savior Wealth’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Savior Wealth will not receive any additional compensation or remuneration as a result of such aggregation.

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

- A. For those clients to whom Savior Wealth provides ongoing investment advisory services, account reviews are conducted on a periodic basis by Savior Wealth’s representatives. All investment advisory clients are advised that it remains their responsibility to advise Savior Wealth of any changes in their investment objectives or financial situation. All clients are encouraged to review financial planning issues, investment objectives and account performance with Savior Wealth on an annual basis either in person or by phone.
- B. Savior Wealth may conduct account reviews upon the occurrence of a triggering event, such as a change in client investment objectives or financial situation, market corrections and client request.
- C. Clients are provided, at least monthly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer or custodian for their account. Savior Wealth may also provide a quarterly written periodic report summarizing account activity and performance.

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

- A. As referenced in Item 12.A.1 above, Savior Wealth receives Additional Benefits and indirect economic benefits from Schwab.
- B. Neither Savior Wealth nor any related person of Savior Wealth directly or indirectly compensates any person for client referrals.

### **Item 15          Custody**

Savior Wealth shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least monthly, with written transaction confirmation notices and regular written summary account statements directly

from the broker-dealer or custodian for their account. Savior Wealth may also provide a quarterly written periodic report summarizing account activity and performance.

To the extent that Savior Wealth provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Savior Wealth with the account statements received from the account custodian.

The account custodian does not verify the accuracy of Savior Wealth's advisory fee calculation.

## **Item 16 Investment Discretion**

Savior Wealth generally provides investment advisory services on a discretionary basis. Prior to Savior Wealth assuming discretionary authority over a client's account, the client is required to enter into an agreement granting Savior Wealth the full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the account.

Clients may impose reasonable restrictions on Savior Wealth's discretionary authority by notifying their representative of those restriction in writing. Unless Savior Wealth notifies the client that they are unable to accept that restriction, Savior Wealth will do its best to honor those restrictions. For example, Savior Wealth may agree to limit the types or amounts of particular securities purchased for a client.

## **Item 17 Voting Client Securities**

- A. Savior Wealth does not vote client proxies. Clients maintain the exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client will be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Savior Wealth will not be responsible and each client has the right and responsibility to take any actions with respect to any legal proceedings, including without limitation, bankruptcies and shareholder litigation, and the right to initiate or pursue any legal proceedings, including without limitation, shareholder litigation, including with respect to transactions, securities or other investments held in the client's account or the issuers thereof

- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Savior Wealth to discuss any questions they may have with a particular solicitation.

## **Item 18 Financial Information**

- A. Savior Wealth does not solicit fees of more than \$1,200, per client, six months or more in advance.

- B. Savior Wealth is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Savior Wealth has not been the subject of a bankruptcy petition.