

Savior LLC  
d/b/a  
Savior Wealth

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ADV Part 2A, Appendix 1  
Wrap Fee Program Brochure  
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**This Wrap Fee Program Brochure provides information about the qualifications and business practices of Savior LLC d/b/a Savior Wealth (“Savior Wealth”). If you have any questions about the contents of this Wrap Fee Program Brochure, please contact us at (617) 699-8877 or [sandro@SaviorWealth.com](mailto:sandro@SaviorWealth.com). The information in this Wrap Fee Program 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 Wrap Fee Program Brochure.

**Savior Wealth’s Chief Compliance Officer, Sandro Gelfusa, remains available to address any questions that a client or prospective client may have regarding this ADV Part 2A Appendix 1 Wrap Fee Program Brochure.**

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#### **Item 4 Services, Fees and Compensation**

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 Bartholomeo may conduct business using a separate DBA, Legacy Wealth Management. Jonathan Penta may conduct business using a separate DBA, Penta Wealth Management. Savior Wealth offers investment advisory services that differ from those described in this Brochure, which are outlined in their Form ADV Part 2A. The Form ADV Part 2A also describes other information about Savior Wealth that is necessary to an understanding of its business and that is relevant to a client’s relationship with Savior Wealth. Clients seeking services as part of the Program (defined below) must read the Form ADV Part 2A in conjunction with this brochure.

##### **A. SAVIOR WEALTH WRAP FEE PROGRAM**

Savior Wealth typically provides investment advisory services on a wrap fee basis through the “Program”. 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

Under the Program, Savior Wealth has the written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority will be included in the written agreement between each client and Savior Wealth. Clients may request amendments to these limitations, in writing, at any time.

The client shall have reasonable access to one of Savior Wealth’s investment professionals to discuss their account.

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.

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.

Savior Wealth’s annual fee for participating in the Program 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. Fees are prorated for accounts opened during the quarter. Clients authorize Savior Wealth to directly debit its advisory fee.

Charles Schwab & Co., Inc. ("Schwab"), serves as the custodian for Program accounts.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of prior written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

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. All details of the Schwab Advisor Services asset-based pricing fees and limitations are included in the separate "Schwab Advisor Services Asset-Based Pricing Addendum to Account Applications and Agreement" which is included in the new account documentation. These fees are not shared with Savior.

The Program's wrap fee does not include certain charges and administrative fees, including, but not limited to, transaction charges (including mark-ups and mark-downs) resulting from trades effected through or with a broker-dealer other than Schwab, transfer taxes, custody fees for non-standard assets, odd lot differentials, mutual fund short-term redemption fees, margin interest, electronic funds or wire transfer fees, exchange fees, interest charges, American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law or otherwise agreed to with regard to client accounts. Such fees and expenses are in addition to the Program's wrap fee. In addition, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses).

Savior Wealth's related persons who recommend the Program to clients do not receive compensation that materially differs from how they are compensated by recommending a non-Program account.

## **Item 5            Account Requirements and Types of Clients**

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

## **Item 6 Portfolio Manager Selection and Evaluation**

- A. Under the Program, Savior Wealth does not use independent portfolio managers that are not associated with Savior Wealth. Savior Wealth will provide the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Therefore, conflicts of interest present in other wrap-fee programs that make both affiliated and unaffiliated portfolio managers available do not exist in this Program.
- B. Savior Wealth acts as the portfolio manager for the Program. The amount of compensation received by Savior Wealth as a result of the client's participation in the Program may be more than what Savior Wealth would receive if the client paid separately for investment advice, brokerage and other services.
- C. As discussed in greater detail in its Form ADV Part 2A, Savior Wealth also provides certain clients investment advisory services on a non-wrap fee basis and other services.

### **Performance Based Fees and Side-By-Side Management**

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

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

Savior Wealth uses the same methods of security analysis, investment strategies and these strategies present the same risk of loss that are described in its Form ADV Part 2A. Those descriptions are incorporated herein by reference.

Investing in securities involves risk of loss that clients should be prepared to bear, including the complete loss of principal investment.

### **Voting Client Securities**

Savior Wealth does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall 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.

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 7 Client Information Provided to Portfolio Managers**

Savior Wealth shall be the Program's portfolio manager. Savior Wealth shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will discuss with each client, their particular investment objective(s). Savior Wealth shall allocate each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose restrictions, in writing, on Savior Wealth's services.

## **Item 8 Client Contact with Portfolio Managers**

The client shall have, without restriction, reasonable access to the Program's portfolio manager.

## **Item 9 Additional Information**

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

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

**Registered Representative of PKS.** 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.

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

Savior Wealth maintains an investment policy relative to personal securities transactions. This investment policy is part of Savior Wealth's overall Code of Ethics, which serves to establish a standard of business conduct for all of Savior Wealth's representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

Savior Wealth also maintains and enforces policies reasonably designed to prevent the misuse of material non-public information by Savior Wealth or any person associated with Savior Wealth.

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.

Savior Wealth and/or representatives of Savior Wealth may 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 presents 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 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 thereafter on a date Savior Wealth selects.

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 presents a conflict of interest.

### **Review of Accounts**

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.

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.

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.

### **Client Referrals and Other Compensation**

Clients and prospective clients should review Item 12 of Savior Wealth’s Form ADV Part 2A for information about the economic benefits that it receives.

Neither Savior Wealth nor any of its representatives compensates any person other than its supervised persons for client referrals.

### **Financial Information**

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

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.

Savior Wealth has not been the subject of a bankruptcy petition.

ANY QUESTIONS: Savior Wealth's Chief Compliance Officer, Sandro Gelfusa, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.