



**Item 1 – COVER PAGE**

FORM ADV PART 2A - BROCHURE  
And  
FORM ADV PART 2B – BROCHURE SUPPLEMENT

December 2018

Sirius Wealth Management Strategies, LLC  
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This brochure provides information about the qualifications and business practices of Sirius Wealth Management Strategies, LLC. If you have any questions about the contents of this brochure, please contact the Firm's Chief Compliance Officer, Matt Vorst, at telephone 650.276.7960. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state authority.

This Brochure provides information which a prospective client may use to determine whether or not to hire our Firm. You are encouraged to review the Brochure and Supplements regarding the Firm's associates for information on the qualifications of the Firm and its employees. The use of the term "registered investment adviser" and description of Sirius Wealth Management Strategies, LLC and our associates as "registered" does not imply a certain level of skill or training.

A copy of the updated Form ADV Part 2A and 2B is available online from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). In addition, any client that would like to receive a copy of the Firms' Form ADV Part 2A and 2B may request one from the Firm's Chief Compliance Officer, noted above.

**Item 2 - MATERIAL CHANGES FROM PRIOR FORM ADV 2A**

There have been no material changes to Sirius Wealth Management Strategies, LLC's Form ADV Parts 2A and 2B since our previous filing dated November 2018.

### Item 3 - TABLE OF CONTENTS

ITEM 1 – COVER PAGE .....	1
ITEM 2 - MATERIAL CHANGES FROM PRIOR FORM ADV 2A .....	2
ITEM 3 - TABLE OF CONTENTS .....	3
ITEM 4 - ADVISORY BUSINESS .....	4
ITEM 5 - FEES AND COMPENSATION .....	6
ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....	8
ITEM 7 - TYPES OF CLIENTS .....	9
ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, RISK OF LOSS .....	9
ITEM 9 - DISCIPLINARY INFORMATION .....	14
ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....	14
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 .....	20
ITEM 16 - INVESTMENT DISCRETION .....	20
ITEM 17 - VOTING CLIENT SECURITIES .....	21
ITEM 18 - FINANCIAL INFORMATION .....	21
BROCHURE SUPPLEMENT .....	22

#### Item 4 - ADVISORY BUSINESS

Firm Established –	2008
Registration Status –	Registered with the SEC as of 2015 <sup>1</sup>
Principal Owners –	Matt Vorst Anne Wakefield Atkinson
Assets Under Management as of December 31, 2018 –	Discretionary Assets – \$207,113,917

#### INVESTMENT MANAGEMENT SERVICES

Sirius Wealth Management Strategies, LLC ("SWMS" or sometimes the "Firm" or "Advisor") is an independent investment advisor offering customized investment management services. Our investment management services include, among others, financial goal setting, risk assessment, strategic asset allocation and the selection and management of securities and investments. SWMS is dedicated to offering strategic advice to clients in the areas of financial planning and investment management. Working with tax planners and legal teams, we offer our clients sound financial planning and risk mitigation strategies that form the basis of each client's investment plan. We offer discretionary investment management services that include investment education, identification of appropriate investment strategies, defining client risk tolerances, directing investment implementation, and monitoring, measurement, and rebalancing of client portfolios.

Our investment solutions are tailored to each client's specific risk tolerance, time horizon, liquidity requirements, and resilience to market volatility. While we strive to create sustainable long-term investment strategies, we review and adjust asset allocations and risk exposure as required by changes in market and client circumstances. The Firm's portfolio managers gather information about each client's individual financial condition and investment goals through personal consultations, questionnaires, and document review. On the basis of this information, the Firm designs an individualized investment plan based on a client's earning capacity, savings, investment history, tax issues, retirement horizon, level of risk tolerance, education and legacy planning, and any other matters that a client or Advisor deems important.

Depending upon the client's investment plan and personal preferences, some or all of following investment management services may be offered. Additional services may be offered as needed or requested.

- Creation of an asset allocation strategy;
- Recommendation of specific securities for investment;
- Execution of securities transactions on behalf of clients through designated custodians and executing broker-dealers;
- Monitoring and rebalancing client account holdings;
- Quarterly performance reporting; and
- Recommendation of high-level, detailed financial planning.

A client may make additions to and withdrawals from the client's custodial account at any time. Clients may withdraw account assets with notice to the Firm, subject to the usual and customary securities settlement procedures. However, we design client portfolios as long-term investments

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<sup>1</sup>"Registration" means only that the Firm meets the minimum requirements for registration as an investment advisor and does not imply a certain level of skill or training or that the SEC or other regulator guarantees the quality of our services or recommends them.

and caution our clients that asset withdrawals may impair the achievement of the client's investment objectives.

Additions to an account may be in cash or securities provided that our portfolio managers may decline to accept particular securities into a client's account or may recommend that the security be liquidated if it is inconsistent with the Firm's investment strategy or the client's investment objectives. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) or tax ramifications.

### **FINANCIAL PLANNING AND FINANCIAL CONSULTING SERVICES**

SWMS may offer comprehensive financial planning services in conjunction with an investment management relationship. Financial planning services vary by entity, family, business, or individual circumstances, and often include working with the following teams to affect a global, strategic plan: estate planners, legal teams, CPA's, bookkeepers, insurance planners, risk management teams, retirement specialists, real estate teams, etc. Contracts with SWMS do not include payment to any party other than those employed by SWMS.

SWMS's financial planning services may include a financial review and analysis of some or all of the following areas:

- Determining Financial Goals and Objectives
- Current Portfolio Review
- Asset Allocation Review
- Cost Audit of Current Investments
- Opinion on Prior Investment Strategy/Advisors
- Retirement Plan Analysis
- Education Funding Analysis
- Cash Flow Management Review
- Review of Insurance Needs
- Mortgage and Refinance Evaluation
- Estate Plan Review or Development
- Charitable (or social capital) Planning
- Other financial or investment analysis

In addition, some clients may own, be granted or may consider purchasing stock options, warrants, restricted stock or similar equity enhancements to their compensation offered or arising from their employment. The Firm offers advice about such investment decisions, as well as about the sale or liquidation of such positions, as part of its services, preferring to work with Client's tax advisor on all tax-ramifications.

### **General Notices**

In performing its services, SWMS is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is authorized to rely on such information as provided. Clients must promptly notify us of any change in their financial situation, investment objectives, or changes in information provided by other professionals that would necessitate a review or revision of the client's portfolio or financial plan.

The Firm recommends its own investment management and financial planning services and in special circumstances those of other professionals to implement investment recommendations. Clients are advised that a conflict of interest may exist if the Firm recommends its own services. Clients requesting investment management services on a non-discretionary basis are under no

obligation to act upon any of the recommendations made by SWMS. Such clients retain absolute discretion over all such investment implementation decisions and are free to accept or reject any of the Firm's recommendations.

### **Fiduciary Status**

Sirius Wealth Management Strategies, LLC and its employees are fiduciaries under ERISA and/or the Internal Revenue Code with respect to any recommendation related to your retirement assets and are committed to offering services and advice that are in the best interest of each client. SWMS is a fiduciary under applicable federal regulations with respect to any recommendations related to your non-retirement assets and is committed to offering services and advice that are in the best interest of each client.

### **Advisor Does Not Provide Comprehensive Tax or Accounting Advice**

In offering investment management services, Advisor's decisions and recommendations may include the consideration of the possible alternative tax consequences incidental to such decisions and recommendations. However, the Firm is not authorized to and does not undertake to provide comprehensive tax or accounting advice or counseling. Although we may prepare reports to assist our clients with the preparation of tax returns, such reports do not represent the advice or approval of tax professionals. We advise clients to consult a tax professional in order to determine the tax and accounting consequences of investments in their accounts.

### **TERMINATION OF AGREEMENT**

Clients may terminate their relationship with the Firm at any time by providing written notice of termination. SWMS may terminate upon giving 30-day written notice to the client. The Firm does not assess any fees related to termination but will be entitled to all management fees earned up to the date of termination. Any unearned prepaid investment management and financial planning fees will be refunded to the client on a pro rata basis determined by the amount of time expired in the billing period. Any unpaid investment management and financial planning fees will be billed to the client for immediate payment or with permission, deducted from the client's account(s).

For new clients of the Firm, if a copy of this Form ADV Part 2A disclosure statement was not delivered to the client 48 hours or more before the client enters into a written advisory contract with Advisor, then the client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. A contract is considered entered into when all parties to the contract have signed the contract. If the client terminates the contract on this basis, all fees paid by the client will be refunded, however, any transaction costs imposed by an executing broker or custodian for establishing the custodial account or for trades occurring during those five days are non-refundable. The client is solely responsible for any unrealized losses and any income taxes due to realized gains.

## **Item 5 - FEES AND COMPENSATION**

### **INVESTMENT MANAGEMENT FEES**

For its investment management clients, SWMS charges a fee based on a percentage of the market value of the investments held in each client's account. All cash and securities assets in a client's account are included in the fee assessment unless specifically identified in writing for exclusion. The annual management fee is billed quarterly, in advance of services..

The management fee is computed on the last day of the billing period by determining the market value of the account using the following guidelines: (a) for marketable securities: the current market price provided by custodian; and (b) for cash or equivalents, at dollar value.

Unless otherwise negotiated between the Firm and the client, the annual fee is calculated according to the following standard fee schedule:

<b>Value of Account Assets</b>	<b>Annual Fee Rate</b>
Up to \$2,000,000	1%
From \$2,000,001 to \$5,000,000	0.75%
From \$5,000,001 to \$10,000,000	0.50%
Above \$10,000,000	Negotiated

The client's investment management fee to the Firm is determined in accordance with the above standard fee structure, with exceptions negotiated on a case-by-case basis at our discretion. Any deviations from the fee structure are based on a number of factors including the nature and length of the client relationship, the services requested, account composition, the amount of work involved, the amount of assets placed under management and the attention needed to manage the account. In its sole discretion, the Firm may offer its investment management services for a fixed annual fee.

If assets are deposited into or withdrawn from a client's account after the inception of a billing period and depending upon the timing or size of such withdrawal or deposit, the fee payable with respect to such assets may not necessarily be adjusted or prorated based on the number of days remaining in the billing period. Accounts initiated or terminated during a calendar month will be charged a prorated fee.

Clients customarily authorize SWMS to deduct its quarterly investment advisory fee directly from their custodial account. This authorization is granted under the terms of the client's signed investment management agreement and the client's instructions to the custodian. It is the client's responsibility to verify the accuracy of the fee calculation, as the custodian will not determine whether the fee is properly calculated.

At the discretion of the Firm, clients may arrange to pay their fee directly to the Firm. Under this arrangement, payment is due upon client's receipt of our billing invoice.

Advisor's investment strategy generally does not encourage clients to use margin account trading. Therefore, the decision as to whether to employ margin is left to the sole discretion of each client. To the extent that a client authorizes the use of margin, and margin is thereafter employed, the market value of the client's account and corresponding management fee payable to Advisor may be increased as any margin balance will not be offset against the value of assets purchased on margin when Advisor calculates its advisory fee.

In certain cases, clients may request that SWMS purchase, maintain, or consolidate preexisting or other securities positions in custodial accounts maintained with the Firm, that are not consistent with the Firm's investment strategy. In such cases, SWMS may not charge a management fee on such assets, with the specific understanding that these are non-managed assets for which client is responsible for determining the suitability of maintaining such a position. The Firm will not sell such securities without specific written instructions from the client.

**GENERAL FEE DISCLOSURE**

We believe our investment management fees are competitive with the fees charged by other investment advisors. However, comparable services may be available from other sources for lower fees than those charged by SWMS.

SWMS receives no sales commissions on investment products purchased or sold for client accounts.

We do not provide clients advice as to the tax deductibility of our advisory fees. Clients are directed to consult a tax professional to determine the potential tax deductibility of the payment of advisory fees.

**CUSTODIAN AND BROKERAGE FEES**

Please see Item 12 below for an explanation of our brokerage practices. Clients incur certain charges imposed by their custodians and other third parties such as custodial fees, 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, clients will incur charges by the executing broker-dealer in the form of brokerage commissions and transaction fees on the investment transactions entered for their account(s). All of these charges, fees and commissions are in addition to Advisor's investment management fee.

**FUND DISCLOSURES**

Investment vehicles such as mutual funds, closed-end funds, exchange traded funds and alternative investment funds offer a wide range of objectives and strategies; the types of securities held by such funds vary widely depending upon the specific objectives and strategies of the vehicle. These investment vehicles incur brokerage and other expenses and their sponsors typically compensate themselves through fees charged directly to the fund. Clients indirectly pay for the expenses and advisory fees charged by the funds in which their assets are invested in addition to the advisory fee charged by SWMS.

All such funds incur operating expenses in connection with the management of the fund. Investment funds pass some or all of these expenses through to their shareholders (the individual investors in the funds) in the form of management fees. The management fees charged vary from fund to fund. In addition, funds charge shareholders (individual investors in the funds) other types of fees such as early redemption or transaction fees. These charges also vary widely among funds. As a result, clients will still pay management fees and other, "indirect" fees and expenses as charged by each mutual fund (or other fund) in which they are invested.

Clients are provided a copy of a fund prospectus for each fund in which they invest by their custodian or by the fund sponsor rather than by SWMS. As required by law, a prospectus represents the fund's complete disclosure of its management and fee structure. In addition, a fund's prospectus can be obtained directly from the fund.

**BOND DISCLOSURE**

Clients whose assets are invested in bonds purchased directly from an underwriter or on the secondary market may pay a sales credit or sales concession on the trade (in lieu of a sales commission). The client's custodian may also impose a fee on the transaction.

**Item 6 - PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT**

SWMS does not charge performance related fees. No part of the investment management fee is calculated as a percentage of the capital gain or capital appreciation of assets. Sirius does not



provide investment management services to any proprietary funds and has no other side-by-side management relationships.

## **Item 7 - TYPES OF CLIENTS**

Our clients include individuals and high net worth individuals, trusts and estates, pension and profit-sharing plans, corporations and other business entities. SWMS's services may not be appropriate for everyone, particularly for smaller accounts. Other investment advisors may provide somewhat similar services for lower compensation, although still others may charge more for similar services.

## **Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, RISK OF LOSS**

### **METHODS OF ANALYSIS**

SWMS uses multiple methods of analysis, including but not limited to, qualitative and quantitative methods. We employ fundamental analysis to form judgments regarding broad market trends and macro-economic conditions. Fundamental analysis involves analyzing real public data, including overall economic and company-specific information available to determine the value of a particular investment. We monitor other industry professionals and seek advice from professional council and known industry experts to help provide inputs into our investment strategy.

### **INVESTMENT STRATEGY**

Believing strongly in high quality and low cost, our core holdings are primarily no-load, low cost and institutional mutual funds, complimented with exchange-traded funds (ETFs), and occasionally individual securities. Mutual funds, and ETFs, widely acknowledged for their broad diversification are the backbone to our planning and investment strategies.

SWMS selects from a wide variety of investment managers who employ a mix of investment strategies, which may include passive or semi-passive indexes as well as active management.

SWMS makes use of many asset classes in its portfolio and it is common to see domestic, international and emerging markets in both equity and fixed income. Furthermore, natural resources, commodities, real estate investment trusts, depleting resources, and occasionally alternative assets may be found in client portfolios, if risk tolerance and time to distribution permits. The Firm's focus is always on the longer-term investment horizon, which means the Firm is an investment firm, and does not focus on frequent trading or speculation.

SWMS offers each client a portfolio built for them with customized strategic solutions.

### **Alternative Investments**

In addition to the investments noted above, the Firm may also offer investment advice regarding alternative investments to qualified clients for whom such investments are deemed suitable. These alternative investments may include, but are not limited to, venture capital, limited partnerships, private equity, managed future funds, hedge funds and third-party funds of funds.

### **INVESTMENT RISKS**

All securities investments carry risk, including the risk that an investor may lose a part or all of his or her initial investment. Risk refers to the uncertainty that the actual returns the investor realizes could differ from the expected return. Risks may be systematic, referring to factors that affect the returns on all comparable investments and that affect the market as a whole. Systematic risks include market risk, inflation risk, interest rate risk, reinvestment rate risk, liquidity risk, purchasing

power risk and exchange rate risk. Non-systematic risks depend on factors that are unique to the specific investment security. These risks include business risk and financial risk.

Our investment approach keeps the risk of loss in mind and clients should do the same. There are many kinds of risks that investment portfolios may be exposed to over time. We believe that by appropriate diversification, these risks may be reduced, but not eliminated altogether. Investing in securities involves the risk of loss that clients must be prepared to bear.

Here are some of the general risks associated with parts of our investment strategy:

### **Domestic and International Equities**

**Investment Style Risk.** The Advisor's judgments about the attractiveness, value and potential appreciation of a particular asset class or individual security in which a client invests may prove to be incorrect and there is no guarantee that the Advisor's judgment will always produce the intended results.

**Market Risk.** Securities traded on securities exchanges are subject to demand and supply conditions. Investors could receive less than the original investment amount when they sell a security if the demand for that security has fallen. Prices generally reflect investors' confidence in the economy, interest rates, and many other factors. Investors must be able to tolerate such price movements.

**Concentration Risk.** Amplified losses may occur from having a large portion of your portfolio holdings in a few individual stocks, or in a few asset classes or market segments.

**Inflation.** Inflation is the loss of purchasing power that results from a general rise in prices. Portfolios may respond either positively or negatively to inflation, but the likelihood is that investors will experience a change in purchasing power that is less advantageous than suggested by nominal (before an adjustment for inflation) measures of return. For example, with inflation, a portfolio designed to distribute a 4% return as current income will experience a decline in purchasing power unless the portfolio strategy is adjusted to take inflation into account.

**Price Fluctuation.** Security prices do fluctuate, and clients must accept the risk associated with price fluctuations or should change to a more appropriate investment portfolio in alignment with their risk tolerance.

**Interest-rate Fluctuation.** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Currency Fluctuation.** International investments are subject to fluctuations in the value of the dollar against the currency of the investment's country of origin, referred to as exchange rate risk.

**Reinvestment of Dividends.** We may reinvest interest, dividends and capital gains as appropriate to accumulate wealth based on factors such as ongoing cash needs and tax loss harvesting opportunities. This is an appropriate strategy for a portfolio designed for capital growth. However, the reinvested earnings could result in a lower or a higher rate of return than was initially projected.

**Sector Risks.** A client's portfolio may be over-weighted in certain market sectors; any negative development affecting those sectors has a greater impact on the client's investments.

**Income Risk.** Dividends may not be paid if a securities issuer reports an operating loss.

**Liquidity Risk.** Liquidity risk exists when particular investments would be difficult to purchase or sell, possibly preventing clients from selling such securities at an advantageous time or price.

**Financial Risk.** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy or a declining market value for the securities issued by such companies.

**Mid-Cap and Small-Cap Risk.** Stocks of mid-cap and small-cap companies can exhibit greater risk than stocks of larger companies. Many of these companies are young and have a limited track record. Their securities may trade less frequently and in more limited volume than those of more mature companies. Mid-cap and small-cap companies also may lack the managerial, financial, or other resources necessary to implement their business plans or succeed in the face of competition or economic turmoil.

**International Investing Risk.** International investing involves risks not typically associated with U.S. investments. These risks include, among others, adverse fluctuations in international currency values as well as adverse political, social, and economic developments affecting non-U.S. countries. In addition, foreign investing involves less publicly-available information, and more volatile or less-liquid securities markets. Investments in international countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from an international country, international tax laws, and potential difficulties in enforcing contractual obligations. International accounting may be less transparent than U.S. accounting practices and international regulations may be inadequate or irregular. Owning international securities could cause the Fund's performance to fluctuate more than if it held only U.S. securities.

**Emerging Markets Risk.** Countries with emerging markets may have relatively unstable governments, social and legal systems that do not protect shareholders, economies based on only a few industries, and securities markets that trade a small number of issues. In addition, emerging securities markets may have different clearance and settlement procedures, which may be unable to keep pace with the volume of securities transactions or otherwise make it difficult to engage in such transactions.

**Net Asset Value and Market Price Risk.** The market value of ETF shares may differ from their net asset value. This difference in price may be due to the fact that the supply and demand in the market for the ETF shares at any point in time is not always identical to the supply and demand in the market for the underlying basket of securities. Accordingly, there may be times when an ETF share trades at a premium or discount to its net asset value.

**Tracking Risk.** ETFs in which a client invests will not be able to replicate exactly the performance of the indices they track because the total return generated by the securities will be reduced by transaction costs incurred in adjusting the actual balance of the securities. In addition, the ETFs will incur expenses not incurred by their applicable indices. Certain securities comprising the indices tracked by the ETFs may, from time to time, temporarily be unavailable, which may further impede the ETFs' ability to track their applicable indices.

**Short-term purchases** While we generally purchase securities with the intent to hold them for more than a year, we may on occasion determine to buy or sell securities in a client's account and hold them for less than a year. Some of the risks associated with short-term trading that could affect

investment performance are increased commissions and transaction costs to the account and increased tax obligations on the gains in a security's value.

**Mutual Funds with International Asset Holdings** Any investments in mutual funds that make international investments and are not hedged back to the U.S. Dollar are subject to uncertainty with changes in international currency values. The client may bear more risk and may earn a substantially higher return or a substantially lower return than projected.

**Margin Trading.** In some cases, and generally only for short-term financing considerations, clients may elect to assume a margin balance on their investment account. The client's custodian may require a percentage of assets under management to be pledged as collateral for the margin amount. Clients risk that in a falling market, the pledged collateral will be insufficient to cover a margin call by their custodian.

**REITS** Publicly traded Real Estate Investment Trusts ("REITs") are companies that own and operate income-producing real estate or related assets. Because REITS are traded publicly, on national securities exchanges, they are subject to the same general risks as those of stock trading such as market risk and income risk. In addition, investments in REITS may involve: Concentration risk - the value of a REIT is derived from one or only a few properties; Liquidity risk - a REIT may be relatively less liquid compared to funds investing in financial securities such as stocks and bonds; Leverage risk - if a REIT uses debt to finance the acquisition of underlying properties, the assets of the REIT will be used to pay off debtors first; and Refinancing risk - higher refinancing cost or stricter underwriting standards when loans are due for renewal.

## **Fixed Income**

**Interest Rate Risk.** Security price and total return will vary in response to changes in interest rates. If rates increase, the market value of bonds generally will decline, as will the value of your investment. Securities with longer maturities tend to produce higher yields but are more sensitive to changes in interest rates and are subject to greater fluctuations in value.

**Credit Risk.** A bond issuer's credit rating may change, which can cause price volatility, and in the case of a credit rating downgrade, lower prices.

**Inflation Risk.** Inflation causes tomorrow's dollar to be worth less than today's; in other words, it reduces the purchasing power of a bond investor's future payments and principal, collectively known as "cash flows." Inflation also leads to higher interest rates, which in turn leads to lower bond prices. Inflation-indexed securities such as Treasury Protection Securities (TIPS) are structured to limit inflation risks.

**Bond Market Risk.** The risk that the bond market as a whole could decline, bringing the value of individual securities down with it regardless of their fundamental characteristics.

**Liquidity Risk.** The risk that investors may have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit ratings downgraded or bonds that sold by an infrequent issuer. Bonds are generally the most liquid during the period right after issuance when the typical bond has the highest trading volume.

**Default Risk.** The possibility that a bond issuer will be unable to make interest or principal payments when they are due. If these payments are not made according to the agreements in the bond documentation, the issuer can default.

**Reinvestment Risk.** When interest rates are declining, investors have to reinvest their interest income and any return of principal, whether scheduled or unscheduled, at lower prevailing rates.

**Call Risk.** Some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor's principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. (See also Reinvestment risk.) If the bond is called at or close to a par value, as is usually the case, investors who paid a premium for their bond also risk a loss of principal. In reality, prices of callable bonds are unlikely to move much above the call price if lower interest rates make the bond likely to be called.

**Prepayment Risk.** For mortgage-backed securities, the risk that declining interest rates or a strong housing market will cause mortgage holders to refinance or otherwise repay their loans sooner than expected and thereby create an early return of principal to holders of the loans.

**Government Risk.** The U.S. government's guarantee of ultimate payment of principal and timely payment of interest on certain U.S. government securities does not imply that shares are guaranteed or that the price of the shares will not fluctuate. In addition, securities issued by Freddie Mac (FHLMC), Fannie Mae (FNMA) and Federal Home Loan Banks are not obligations of, or insured by, the U.S. government. If a U.S. government agency or instrumentality in which a client invests defaults and the U.S. government does not stand behind the obligation, the security price could fall.

**Legislative Risk.** The risk that a change in the tax code could affect the value of the taxable or tax-exempt interest income.

**Mello Roos Land-Secured Bonds.** Generally, the risks of Mello Roos bonds include: Development Risk - Until fully built-out, all land-secured bonds bear some degree of development risk subject to downturns in the real estate market. Higher Leverage - If a portion of the property securing the bonds remains undeveloped, the value of the undeveloped property may fall below the amount of the land-secured debt allocated to that property in which case, either the property owner or mortgage holder may not remain economically motivated to pay special tax obligations. A Higher Value-To-Lien Ratio could potentially provide a stronger incentive for a property owner or mortgage holder to pay taxes and or assessments due on that property. Taxpayer Concentration - A land-secured municipal bond deal can mean investors have long-term exposure to a single developer or group of developers, a characteristic that would be lengthened if project development slows.

### **Alternative Investments**

**Alternative Assets.** Many alternative investments are illiquid, having "lock-up" periods or only set intervals in which client redemptions may be made which render the investments sometimes more difficult to trade. Consequently, such holdings may limit a client's ability to dispose of such investments in a timely manner and at an advantageous price. Furthermore, depending upon the asset itself and its holdings, there may be no readily available market value for the asset potentially affecting the valuation at redemption.

**Private Equities.** We may purchase or recommend the inclusion of shares in non-publicly traded equities in the accounts of accredited clients. These companies will generally have little available information on their financial status, capital structure or revenues, resulting in increased risk of loss, including total loss. In addition, these securities may be highly illiquid or may experience losses of liquidity – resulting in an inability to sell said equities or sales prices that are substantially below the purchase or market price. Unless otherwise expressly agreed, we will value these positions at their purchase price for any accounting purposes, which may not reflect losses that would be realized if the position was sold. Of particular risk is that the Firm may base its account values for billing purposes on these positions' purchase price (unless another methodology is agreed upon with the client), leading to a potential motivation to overvalue said equities. Finally, we may have clients who are executives of said firms or have other financial relationships that may create conflicts of interest. Where such conflicts exist, the Firm will disclose these conflicts in written format to the clients who hold such securities or whom we intend to purchase such securities under our discretion prior to any transactions.

#### **Item 9 - DISCIPLINARY INFORMATION**

SWMS, nor its advisors, have any disciplinary history and consequently, are not subject to any disciplinary disclosures.

#### **Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

SWMS is an independent investment advisor, unaffiliated with any other financial institution or securities dealer or issuer. We recommend that our clients custody their assets with Charles Schwab & Co., Inc. ("Schwab"), an SEC registered broker-dealer and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). Although we recommend that our clients custody their investment accounts at Schwab, we have no affiliation with Schwab, do not supervise its brokerage activities and are not subject to its supervision. (See Item 12 below for more information.)

Although we may refer our clients to other professionals such as attorneys or accountants for estate planning, tax or other matters, neither the Firm nor its Members or employees are affiliated with any law or accountancy firm.

#### **Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

SWMS, its Members and their immediate families (sometimes collectively "employees") are permitted to buy and sell securities for their personal investment accounts. The Firm has adopted employee personal trading policies and procedures and a code of ethics to govern proprietary (on behalf of the Firm itself) and employee trading practices. Employees with access to the Firm's investment decision-making and trading activities are required to report all personal securities transactions on a regular basis. All personnel are required to abide by the Firm's personal trading practices and code of ethics which governs employee trading practices and specifically prohibits employee trading on the basis of inside information and trading ahead of customer orders (front-running). SWMS's employee personal trading policies and code of ethics are made available to clients and prospective clients upon request.

Employees may trade in the same securities traded for clients. However, it is Firm policy not to give preference to orders for personnel associated with the Firm regarding such trading. Employees may personally invest in the same securities that are purchased for client trading accounts and may own securities that are subsequently purchased for client accounts. From time

to time, trading by employees in particular securities may be restricted in recognition of impending investment decisions on behalf of clients. It is Firm policy, where there are client and employee trades in the same security on the same trading day that employee trades either be executed at the end of the trading day or aggregated with the client trades.

Employees may buy or sell different investments, based on personal investment considerations, which the Firm may not deem appropriate to buy or sell for clients. It is also possible that employees may take investment positions for their own accounts that are contrary to those taken on behalf of clients. Employees may also buy or sell a specific security for their personal account based on personal investment considerations aside from company or industry fundamentals, which are not deemed appropriate to buy or sell for clients. Conversely, employees may liquidate a security position that is held both for their own account and for the accounts of Firm clients, sometimes in advance of clients. This occurs when personal considerations (i.e., liquidity needs, tax-planning, industry/sector weightings) deem a sale necessary for individual financial planning reasons.

SWMS's Members are governed by strict codes of ethics which require that they:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets.
- Place the interests of clients and the integrity of the investment profession above their own personal interests.
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities. Practice and encourage others to practice in a professional and ethical manner that will reflect credit on ourselves and the profession.
- Promote the Integrity of, and uphold the rules governing, capital markets.
- Maintain and improve their professional competence and strive to maintain and improve the competence of other investment professionals.
- Protect and exercise diligence and care maintaining client non-public, confidential information
- Employees are prohibited from receiving any gift, gratuity, hospitality, or other offering of more than de minimis from any person or entity doing business with Sirius. The gift policy generally excludes items or events where the employee has reason to believe there is a legitimate business purpose.

## **Item 12 - BROKERAGE PRACTICES**

### **RECOMMENDATION OF SCHWAB AS CUSTODIAN AND EXECUTING BROKER**

SWMS recommends that clients establish brokerage accounts with Schwab, a registered broker-dealer, to maintain custody of clients' assets and to effect trades for their accounts. Schwab is independently owned and operated and not affiliated with SWMS and does not supervise or otherwise monitor SWMS's investment management services to its clients.

### **How We Select Custodians/Brokers**

We seek to use a custodian/broker who will hold clients' assets and execute transactions on terms that are, overall, advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for clients' accounts)

- Breadth of available institutional investment products (mutual funds, exchange-traded funds, stocks, bonds, etc.)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Quality of services
- Competitiveness of the institutional pricing of those services (commission rates, margin interest rates, other fees, etc.) And willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior customer service to us and our clients
- Availability of investment research and tools that assist us in making investment decisions
- Availability of other products and services that benefit us (see products and services available to us from Schwab, below)
- An international footprint with wide availability of local branch offices.

### **Custody and Brokerage Costs**

For our clients' accounts that Schwab maintains, Schwab generally does not charge separately for custody services but is compensated by charging commissions or transaction fees on trades that it executes or that settle into clients' Schwab accounts. Schwab's commission rates and transaction fees applicable to our client accounts are negotiated. This commitment benefits clients because the overall commission rates and transaction fees paid are lower than they would be otherwise.

In order to minimize trading costs, we have Schwab execute trades for clients' accounts. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of clients' trades. Best execution means obtaining favorable terms for a transaction based on all relevant factors, including those listed above (see How We Select Custodians/Brokers).

### **Products and Services Available to Us from Schwab**

Schwab Advisor Services™ is Schwab's business unit serving independent investment advisory firms like SWMS. They provide SWMS and its clients with access to its institutional brokerage services — trading, custody, reporting, and related services — 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 our clients' accounts; while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we do not have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of assets in accounts at Schwab. What follows is a more detailed description of Schwab's support services:

### **Services That Benefit Our Clients**

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 we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

### **Services That May Not Directly Benefit Our Clients**

Schwab also makes available to SWMS other products and services that benefit the Firm but may not directly benefit SWMS clients or their accounts. These products and services assist in managing and administering client accounts. For example, Schwab currently provides an annual \$3,500 offset to the Firm's licensing fee for Portfolio Center, Schwab's proprietary account management platform. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts



not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- provide access to client account data (such as duplicate trade confirmations and account statements)
- assist with recordkeeping, and client reporting
- facilitate payment of our management fees from our clients' accounts

#### **Services That Generally Benefit Only SWMS**

Schwab also offers other services intended to help manage and develop SWMS' business enterprise. These services include:

- educational conferences and events
- publications and conferences on practice management and business succession
- consulting on technology, compliance, legal, and business needs
- 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. 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 occasionally provide SWMS with other benefits, such as business entertainment of our personnel.

#### **Our Interest in Schwab's Services**

The availability of these services from Schwab benefits SWMS as SWMS does not have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. SWMS understands and acknowledges that receiving these services is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is appropriate for our clients, and independent of any services received. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see How We Select Custodians/Brokers, above) and not Schwab's services that benefit only us. We have in excess of \$200 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

#### **DIRECTED BROKERAGE**

Certain clients may direct SWMS to place all orders for securities transactions with a specific broker-dealer (directed brokerage). In these cases, SWMS is not obligated to, and will generally not solicit competitive bids for each transaction or seek the lowest commission rates for the client. As such, the client may pay higher commission costs, higher security prices and transaction costs than it otherwise would have had it not directed SWMS to trade through a specific broker. In addition, the client may be unable to obtain the most favorable price on transactions executed by SWMS as a result of SWMS' inability to aggregate/group the trades from this account with other client trades.

Furthermore, the client may not be able to participate in the allocation of a security of limited availability (such as an IPO) for various reasons, including if those new issue shares are provided by another broker or dealer. As a result of the special instruction, SWMS may not execute client

securities transactions with brokers that have been directed by clients until non-directed brokerage orders are completed. Accordingly, clients directing brokerage may not generate returns equal to clients that do not direct brokerage.

Due to these circumstances, there may be a disparity in commission rates charged to a client who directs SWMS to use a particular broker and performance and other differences from other similarly managed accounts. Clients who direct brokerage should understand that similar brokerage services may be obtained from other broker-dealers at lower costs and possibly with more favorable execution.

#### **SOFT DOLLAR ARRANGEMENTS AND POTENTIAL CONFLICTS**

SWMS is not a party to formal agreements whereby, in exchange for directing commissionable trades to a broker-dealer, it receives research or brokerage services, known as "soft dollar" services and research. "Soft dollars" refers to the use of brokerage commissions on client trades to pay for the soft dollar research or brokerage services received. Soft dollar research and services may include among others, economic and market information, portfolio strategy advice, proxy voting services, industry and company comments, technical data, recommendations, research conferences, general reports, periodical subscription fees, consultations, performance measurement data, on-line pricing, news wire charges, quotation services, computer hardware and software.

Although SWMS does not formally participate in soft dollar arrangements, it may receive services and research from Schwab because its clients custody their assets with Schwab. In such cases, it is the Firm's policy is to limit its use of soft dollar arrangements to those falling within the safe harbor of Section 28(e) of the Securities and Exchange Act of 1934, as amended. Only *bona fide* research and brokerage products and services that provide assistance to SWMS in the performance of its investment decision-making responsibilities are permitted.

SWMS may, on occasion, be the recipient of unsolicited discounts on software and other services. The discounts are generally offered to all firms who fit a common profile and SWMS is not offered such discounts because of a particular event or request. Such discounts are accepted with the intent to benefit all clients and the value of these discounts is not considered in the process of selecting securities to purchase for client accounts.

#### **AGGREGATION OF TRADES AND POTENTIAL CONFLICTS**

SWMS may aggregate client orders into a single trade if aggregation appears to be in the best interests of all the clients involved. Trade aggregation may result in a more favorable transaction price than would result with a separate execution of each client order. The Firm does not aggregate securities transactions for client accounts unless it believes that aggregation is consistent with its duty to seek best execution and is consistent with the investment objectives and guidelines for the client accounts participating in the trade.

SWMS believes that combining trade orders should be advantageous to all clients over the long term. However, it is possible that the average price obtained through aggregation could be less advantageous for a client than if the client had executed the transaction separately or had executed the transaction before the other parties to the aggregated trade. The Firm tries to be conscious of this possibility before deciding to aggregate.

When orders are aggregated, the price paid by each account is the average price of the order. Transaction costs are allocated to each client by the client's custodian according to the client's custodial agreement. It is our policy that trades are not allocated in any manner that favors one group of clients over another over time. Generally, SWMS and its associated persons may

participate in such aggregated orders. Aggregated trades placed with different executing brokers may be priced differently.

#### **ALLOCATION OF OPPORTUNITIES AND POTENTIAL CONFLICTS**

Because we manage more than one client account, there may be a conflict of interest related to the allocation of investment opportunities among all accounts managed by the Firm. We attempt to resolve all such conflicts in a manner that is generally fair to all clients over time. We may give advice and take action with respect to any of our clients that may differ from advice given or the timing or nature of action taken with respect to any other client based upon individual client circumstances. It is our policy, to the greatest extent practicable, to allocate investment opportunities over a period of time on a fair and equitable basis relative to all clients. The Firm is not obligated to acquire for any client account any security that the Firm or its owners, officers, employees or affiliated persons may acquire for their own accounts or for the account of any other client, if in the discretion of the portfolio managers, based upon the client's financial condition and investment objectives and guidelines, it is not practical or desirable to acquire a position in such security for that account.

#### **Item 13 - REVIEW OF ACCOUNTS**

All accounts under management are monitored on a regular basis by Matt Vorst and Anne Wakefield Atkinson. Account holdings and asset allocations are reviewed periodically. Reviews determine consistency with the Firm's investment strategy and with client investment objectives. Mr. Vorst and Ms. Atkinson review asset class allocations, cash allocations and other account factors. Portfolio adjustments may be required due to client investment guideline changes, client deposits and withdrawals, or client liquidity needs. Additionally, client accounts are reviewed in response to changes in the financial markets or changes in the Firm's investment strategy.

In addition to statements provided by the clients' brokers, SWMS sends client reports to its investment management clients on a quarterly basis with information about securities held in their account, current valuations and asset allocation.

A re-assessment of financial plans is recommended at least biennially, and more often as requested by the client. Reports related to financial planning, such as long-term financial projections or cash flow analyses, are offered during review meetings or as requested by the client.

Schwab's brokerage account statements list all positions and detail investment transactions, and are sent directly from the custodian of the client's account on at least a quarterly basis. Clients are advised to review these statements routinely and to compare them to the client account reports prepared by the Firm.

#### **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

SWMS does not pay referral fees to any third-party firms or individuals for recommending the Firm to prospective clients, nor are the Firm or its employees paid referral fees by any third party for referring clients to their businesses. We do not direct brokerage transactions to any broker-dealer in exchange for receiving client referrals.

SWMS employees are not paid "sales awards" or other prizes for referring clients to the Firm.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts

of interest are described above (see *Item 12 – Brokerage Practices*). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## **Item 15 - CUSTODY**

SWMS does not maintain physical custody of client funds or securities. Clients are required to set up their investment accounts with a "qualified custodian," namely a broker dealer, bank or trust company (generally Schwab). SWMS is unable to take even temporary possession of client assets for the purpose of transferring them to the client's account. Each client has a direct relationship with their custodian and is responsible for making deposits to and withdrawals from their account as necessary. The Firm is given the authority to receive payment of its management fees directly from the account, but it is not authorized to make any other withdrawals or to transfer money out of the account to a third party without specific client approval.

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly showing all funds and securities held, their current value and all transactions executed in the client's account, including the payment to SWMS of its investment management fees. Account statements are sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic reports you may receive from us.

## **Item 16 - INVESTMENT DISCRETION**

Clients appoint SWMS as their investment advisor and grant full trading and investment authority over their assets at the time they establish their investment accounts. Subject to the Firm's investment strategy and the client's investment objectives, our portfolio managers are given full discretion to determine:

- Types of investments;
- Which securities to buy;
- Which securities to sell;
- The timing of any buys or sells;
- The amount of securities to buy or sell; and
- The broker-dealer to be used in the transaction

This discretion may be limited by client investment guidelines and by any investment restrictions set by the client. Where possible, the Firm will attempt to negotiate the fees paid for transactions in client accounts, with the objective of attaining the most favorable price and market execution for each transaction.

On occasion the Firm may accept management of specific client assets or accounts on a non-discretionary basis. In these instances, our Advisors may make recommendations to the client regarding types of investments to buy and sell, the timing and amount of such transactions and where applicable, the executing broker-dealer to execute the transactions. The decision to implement or reject the portfolio manager's recommendations remains with the client and transactions will be entered only after specific client authorization.

**Item 17 - VOTING CLIENT SECURITIES**

It is SWMS's policy not to vote proxy solicitations or other corporate actions received on behalf of clients from the issuers of securities held in client's account. All such solicitations are forwarded to client for voting. Any client wishing to review our proxy voting policies in full may request a copy from the Firm at his or her convenience.

**Item 18 - FINANCIAL INFORMATION**

SWMS does not require or solicit prepayment of its management fees from clients six or more months in advance. There are no adverse conditions related to the Firm's finances that are likely to impair its ability to meet its contractual commitments to its clients. The Firm has never been the subject of a bankruptcy filing.



**Item 1 – Cover Page**

**FORM ADV PART 2B\***  
**Brochure Supplement**

Professional Backgrounds of

**MATT VORST**, MBA, CFP®, CIMA®, CFA® Level 2 Candidate

**ANNE WAKEFIELD ATKINSON**

Sirius Wealth Management Strategies, LLC  
1040 Noel Drive, Suite 104, Menlo Park CA 94025

650.276.7960

\*This brochure supplement provides information about the qualifications of Sirius Wealth Management Strategies, LLC's professional personnel. This is a supplement to the Sirius Wealth Management Strategies, LLC Part 2A brochure. Please contact the Firm's Chief Compliance Officer Matt Vorst at the above number if you have any questions about the contents of this supplement. Additional information about Sirius Wealth Management Strategies, LLC and its registered personnel is available on the internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Each member of SWMS' professional staff is evaluated on the basis of his or her education and work experience. As general standards, an undergraduate degree and prior related business experience are required. Graduate work and professional certifications are preferred.

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## **MATT VORST, MBA, CFP®, CIMA®, CFA® Level 2 Candidate**

Born: 1969

### **Item 2 - Educational Background and Business Experience**

#### Education:

- Texas A&M University, BA Psychology (1992)
- University of Notre Dame, MBA Finance (1997)

#### Business Background:

- Founder and Principal, Sirius Wealth Management Strategies, LLC (2008)
- Chief Operations Officer -North Vector (2007 - 2008) - internationally recognized explosive breaching training firm focusing on training, product development, and government contracts.
- Chief Operations Officer - All Fab (2005 - 2006) - internationally diverse manufacturing firm catering to the high tech arena with specialties in networking rack systems and quick turn prototyping.
- Merrill Lynch Financial Advisor (2001 - 2005) - Advisor to high net worth individuals, business owners, and charitable organizations
- Jasmine Networks (2000 - 2001) - Co-founder of company, responsible for fund raising, business development. Reported to CEO
- Intel Corporation (1997 - 2000) corporate finance and Intel Capital - corporate finance acting as right hand to Americas Sales and Marketing VP, a \$15 billion stand-alone corporation. Second assignment was with Intel Capital, Intel's corporate venture arm.

#### Professional Designations:

- CFP®\*\* - Certified Financial Planner (2003)
- CIMA®\*\*\* - Certified Investment Management Analyst (2004)
- CFA®\* - Chartered Financial Analyst - Level 2 Candidate (2018)

### **Item 3 – Disciplinary Information**

Mr. Vorst has no legal or disciplinary events or disclosures.

### **Item 4 – Other Business Activities**

Mr. Vorst is involved in no other, outside business activities.

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

Mr. Vorst receives no economic benefit from any non-client third party for the provision of investment advisory services.

### **Item 6 – Supervision**

All Firm personnel are supervised by Chief Compliance Officer, Matt Vorst whose supervision is ongoing and includes account reviews, trade supervision, annual compliance reviews including the forensic testing of Firm systems and employee reviews.

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## ANNE WAKEFIELD ATKINSON

Born: 1958

### **Item 2 - Educational Background and Business Experience**

#### Education:

- MBA in Finance and Investments, Golden Gate University, 1992
- BS in Business Administration, San Jose State University, 1982

#### Business Background:

- Principal, Sirius Wealth Management Strategies, LLC  
April 2017.
- Managing Member, Thomas & Atkinson Capital Management LLC  
May 2004 – March 2017
- Vice President and Portfolio Manager, Seton Smoke Capital Management  
August 1986 – May 2004

### **Item 3 – Disciplinary Information**

Ms. Atkinson has no legal or disciplinary events or disclosures.

### **Item 4 – Other Business Activities**

Ms. Atkinson is involved in no other, outside business activities.

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

Ms. Atkinson receives no economic benefit from any non-client third party for the provision of investment advisory services.

### **Item 6 – Supervision**

All Firm personnel are supervised by Chief Compliance Officer, Matt Vorst whose supervision is ongoing and includes account reviews, trade supervision, annual compliance reviews including the forensic testing of Firm systems and employee reviews.



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\* The Chartered Financial Analyst ("CFA") designation requires the holder to pass three six-hour exams, possess a bachelor's degree (or equivalent, as assessed by CFA institute) and have 48 months of qualified, professional work experience. CFA charter holders are also obligated to adhere to a strict code of ethical standards governing professional conduct.

\*\* The Certified Financial Planner™ ("CFP®") designation requires the holder to meet education, examination, experience and ethics requirements, and pay an ongoing certification fee. A bachelor's degree (or higher), or its equivalent in any discipline, from an accredited college or university is required. Students are required to complete course training in nine core financial topic areas, sit for a 10 hour CFP Board Certification Examination, acquire three years full-time or equivalent (2,000 hours per year) part-time work experience in the financial planning field and undergo an extensive background check—including an ethics, character and criminal check. To maintain the CFP certification, CFP® professionals must complete 30 hours of continuing education (CE) accepted by CFP Board (including completion of 2 hours of CFP approved Ethics CE).

\*\*\* The CIMA® designation is administered through Investment Management Consultants Association, IMCA®. It signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination. CIMA® designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.