



Item 1 – Cover Page

**Arcadia Wealth Management, Inc.
Form ADV Part 2A
10 Edgewood Avenue
Smithtown, NY 11787**

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This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Arcadia Wealth Management, Inc. (“Arcadia” or the “Advisor”) If you have any questions about the contents of this Disclosure Brochure, please contact us at (631) 549-5400. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Arcadia is also available on the SEC’s website at www.advisorinfo.sec.gov by searching with our firm name or our CRD# 165504.

Arcadia is a registered investment adviser; registration does not imply a certain level of skill or training.

Updated: March 21, 2019

Item 2 – Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplements provides information about Advisory Persons of Arcadia.

Arcadia believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Arcadia encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been changes to this Disclosure Brochure that we are required to disclose to Clients. These material changes include:

The Advisor will no longer offer 3(38) retirement plan advisory services.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Arcadia.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

REGISTERED INVESTMENT ADVISOR

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Item 4 – Advisory Business

A. Firm Information

Arcadia Wealth Management, Inc., ("Arcadia" or the "Advisor") is an investment adviser registered with the U.S. Securities and Exchange Commission ("SEC"). Walter F. Wisniewski, Jr., CFP® is the founder, CEO, sole principal owner and President of Arcadia Wealth Management since inception in 2012.

B. Advisory Services Offered

Arcadia provides services in three broad categories: financial planning services, investment management/advisory services and retirement plan advisory services to individuals, high net worth individuals, retirement plans, trusts, estates, and corporations (each a "Client").

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Arcadia provides specialized investment management services, investing the assets of the client's investment portfolio by selecting mutual funds and individual securities. A client's investment portfolio is constructed from the client's goals, objectives and risk tolerance. Arcadia provides investment consultation services; investment selection and monitoring of mutual fund portfolios, and assists the client in implementing a strategy for the clients' overall investment objectives. From time to time, Arcadia may make changes in the selection or allocation of investment alternatives. This may be done on a discretionary or non-discretionary basis depending on the agreement with the client. The investments selected by Arcadia predominately include Dimensional Fund Advisors ("DFA") and Schwab One-Source mutual funds, and Arcadia implements a long-term investment strategy which has been designed to result in low investment turnover.

Financial Planning Services

Arcadia offers financial and retirement planning to its Clients. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. Financial planning addresses the following areas: retirement, college education, and other goal funding; income tax planning; life, disability, long-term care, homeowners and automobile insurance; and estate planning.

Clients of Arcadia can also receive investment advice on a more limited basis. This may include advice on certain areas of interest or need such as estate planning, retirement, 401(k) or 403(b) investment allocations or any other specific topic.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction[s] through the Advisor.

Retirement Plan Advisory Services

Arcadia may provide non-discretionary (under ERISA 3(21)) retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"), pursuant to the terms of the retirement plan advisory agreement. The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

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Retirement plan advisory services are provided by Arcadia serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Arcadia’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging Arcadia to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Asset Allocation – Arcadia will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Arcadia will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Arcadia will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

Arcadia does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Arcadia.

E. Assets Under Management

Client assets are managed on both a discretionary and non-discretionary basis. At the inception of each client relationship or upon request, Arcadia will document any client requested restrictions to be applied to the management of their account.

Assets under management as of December 31, 2018:

Discretionary: \$140,141,498
Non-Discretionary: \$0
Total Managed: \$140,141,498

Item 5 – Fees and Compensation

Arcadia is a fee-only advisor. In other words, Arcadia receives compensation exclusively from its clients, and does not receive commissions or referral fees from any product or service providers.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Arcadia's fees are based on a percentage of assets under management at the end of the prior calendar quarter. Investment management service fees range from 0.50% to 2.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Arcadia will be independently valued by the Custodian. Arcadia will not have the authority or responsibility to value portfolio securities.

The Advisor’s fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client.

Financial Planning Services

Financial planning services will be provided at an hourly rate of \$250 per hour. An estimate for total hours will be determined prior to engaging for these services.

Retirement Plan Advisory Services

Retirement plan advisory fees range up to 1.25%, and are paid quarterly, in advance or at the end of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are based on the market value of assets in the plan on the last day of the prior or current quarter. Fees are based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Fees may be negotiable depending on the size and complexity of the Plan. Certain existing Clients may have fees that differ from the range above.

B. Fee Billing

Investment Management Services

Fees are calculated in advance for the majority of Arcadia's Client accounts based on the market value of the managed assets on the last day of each Client billing quarter. The first quarterly fee will be the end of the third month after investment advisory or financial planning services are provided to the Client. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Arcadia at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Arcadia to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Clients generally authorize the Custodian to debit the advisory fee from the account and pay it to Arcadia. Occasionally, Arcadia will ask a Client to pay the fee directly. Arcadia will send the Client an invoice showing the amount of the fee, the value of the Client's assets on which the invoice was based, and the specific manner in which the advisory fee was calculated. Arcadia sends this invoice to the Client at the same time as it sends the Custodian instructions to debit the Client's account. The Custodian sends a statement to the Client, at least quarterly, indicating any amounts disbursed from the account, including the amount of any advisory fee paid to Arcadia.

Financial Planning Services

Financial planning fees are invoiced upon completion of the agreed upon deliverable[s].

Retirement Plan Advisory Services

Arcadia is compensated for its services at the beginning or end of the quarter, pursuant to the retirement plan advisory agreement. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Arcadia, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by Arcadia are separate and distinct from these custody and execution fees.

In addition, all fees paid to Arcadia for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Generally, Clients may be able to invest in these products directly, without the services of Arcadia, but would not receive the services provided by Arcadia which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. However, mutual funds sponsored by DFA are generally only available through registered investment advisors. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Arcadia to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

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D. Advance Payment of Fees and Termination

Investment Management Services

Arcadia is compensated for its services in advance of the quarter in which investment advisory services are rendered. Investment management services may be terminated upon 30 days written notice by either the Client or Arcadia. Upon notice provided to Arcadia, unearned fees paid in advance to Arcadia will be ratably refunded. Clients may terminate the Advisory relationship during the first 5 days at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

Arcadia may be partially compensated for its financial planning services in advance of the engagement. Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

Arcadia is compensated for its services in advance of the quarter in which retirement plan advisory services are rendered. Either party may request to terminate their services with Arcadia, at any time, in whole or in part, by providing advance written notice to the other party. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Arcadia does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

Arcadia does not charge any performance-based fees, that is, fees based on a share of capital gains on or capital appreciation of clients' assets.

Arcadia does not do any Side-by-Side management. Side-by-Side Management refers to managing some accounts that are charged a performance-based fee, and others that are charged an asset-based fee.

Item 7 – Types of Clients

Arcadia offers investment advisory services to individuals, pension and profit sharing plans, trusts, estates, and corporations. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor.

Arcadia's ideal Clients are individuals and families with investment assets between \$1 million to \$10 million.

Arcadia generally requires a minimum account size of \$500,000 in assets under management. While Arcadia's minimum account size are typically not negotiable, under varying circumstances one or both may be negotiated.

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

Arcadia uses globally diversified and balanced portfolios. Arcadia's basic philosophy is that the markets are efficient, and that it is not possible to outperform the market by making forecasts. Therefore, Arcadia does not choose individual securities that will outperform the market, nor does Arcadia forecast when the markets are going to go up or down, or which asset classes are likely to outperform other asset classes. Arcadia believes this approach typically leads to a tax-efficient, low-turnover portfolio.

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Equity mutual funds are selected in the following asset classes: US Stocks, International Stocks, Emerging Markets Stocks, and Real Estate Stocks. Generally, the equity portion of the portfolio is small company-tilted and value-tilted, as based on the academic research of Eugene Fama, Kenneth French and others.

Fixed income securities and fixed income mutual funds are selected in the following asset classes: Short-Term Bonds, Intermediate-Term Bonds. Bonds should have high quality (rated BBB or above). Foreign bond mutual funds typically have the currency hedged to the US dollar.

Where possible, Arcadia uses the mutual funds of Dimensional Fund Advisors ("DFA"), a firm with a similar investment philosophy. The purchase and sale of each DFA mutual fund incurs a Charles Schwab transaction fee, thus using a low-turnover strategy also provides low fees for the client.

However, smaller accounts (generally under \$70,000) are too small to diversify in all of the asset classes using the transaction fee funds in a cost-effective manner. Therefore, Arcadia chooses Schwab One Source funds that have no transaction fees in the above asset classes. These funds are selected using the following criteria: passive (index) funds if possible, a history of no style drift, low expense ratio, low turnover, low (\$1) minimum purchase, and historic returns similar to the index return.

Arcadia believes that portfolios must be monitored regularly, and rebalanced when allocations have changed enough to significantly affect the targeted risk exposure of that portfolio.

While Arcadia employs all of these investment methodologies in an attempt to optimize the risk-adjusted returns of client portfolios, risk can never be eliminated. Investing in securities, including mutual funds, always involves risk of loss which clients should expect to bear. Specifically, client portfolios are exposed to the following primary risks.

- **Market Risk** – Economic, political, and issuer-specific events may cause the value of securities to rise or fall.
- **Small Company Risk** – Securities of small companies are often less liquid than those of large companies. As a result, small company stocks may fluctuate relatively more in price.
- **Foreign Securities and Currencies Risk** – Foreign securities prices may decline or fluctuate because of economic or political actions of foreign governments, and/or because of less regulated or less liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency may fluctuate in value against the U.S. dollar).
- **Emerging Markets Risk** – Numerous emerging market countries have experienced serious economic and political problems. Stock markets in many emerging market countries are relatively small, expensive to trade and risky. Foreigners are sometimes limited in their ability to invest in, and withdraw assets from these markets.
- **Credit Risk** – Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value.
- **Interest Rate Risk** – Fixed income securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. In general, fixed income securities with longer maturities are more sensitive to these price changes.
- **Income Risk** – Income risk is the potential for a decline in the fund's income due to falling interest rates.
- **Inflation Risk** – Inflation risk, also called purchasing power risk, is the chance that the cash flow from an investment won't be worth as much in the future because of changes in purchasing power due to inflation.
- **Mutual Fund Risks** - The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price

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as a mutual fund purchased later that same day. Mutual funds sponsored by DFA are generally only available through registered investment advisors. If a Client were to terminate with Arcadia, restrictions regarding transferability and/or additional purchases of, or reallocation among, DFA funds will apply.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There have been no criminal or civil investment-related actions against Arcadia or any of its principals or Supervised Persons, nor has it or any of its principals or Supervised Persons been the subject of any violation of an investment-related statute or regulation. There also have been no administrative proceedings before the SEC or any other federal, state, or foreign regulatory authority causing Arcadia or any of its principals or employees to be denied authorization to act in any investment-related business or activity. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov and can be found by searching with our firm name or our CRD# 165504.

Item 10 – Other Financial Industry Activities and Affiliations

Arcadia is an independent investment advisory firm.

Arcadia is not a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading adviser and there are no principals or employees who are registered representatives of any of these types of firms. Arcadia does not have any relationships or arrangements that could create a material conflict of interest for clients with any of the following: broker-dealer, municipal securities dealer, government securities dealer or broker, investment company or other pooled investment vehicle, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or other commodity trading adviser, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, sponsor or syndicator of limited partnerships.

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

To avoid any potential conflicts of interest involving personal trades, Arcadia has adopted a Code of Ethics (the “Code”), which includes a formal code of ethics and insider trading policies and procedures. Arcadia’s Code requires, among other things, that all persons associated with Arcadia (our “Supervised Persons”):

- 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 integrity of the investment profession, the interests of clients, and the interests of Arcadia above one’s own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- 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 yourself and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal securities laws.

Arcadia’s Code also requires Supervised Persons with access to Client account information (our “Access Persons”) to report personal securities transactions on at least a quarterly basis, and provide Arcadia with a detailed summary of certain holdings (at the start of employment and annually thereafter) over which such Access Persons have a direct or indirect beneficial interest.

If Arcadia ever recommends a security in which it, or its Access Persons buy and/or sell for themselves, Arcadia will ensure that the price paid or received by its advisory clients for any investment shall not be affected by a buying or selling interest on the part of

Arcadia or its Access Persons, or otherwise result in an inappropriate advantage to Arcadia or its Access Persons. **At no time will Arcadia or any Access Persons, transact in any security to the detriment of any Clients.**

A copy of Arcadia's Code shall be provided to any Client or prospective client upon request. To request a copy of our Code of Ethics, please contact us at (631) 549-5400.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Arcadia does not have discretionary authority to engage the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard its Client's assets and authorize Arcadia to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Arcadia does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Arcadia does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for execution and/or custody services. Arcadia may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by the Advisor.

Arcadia will generally recommend that Clients establish their account[s] at Charles Schwab & Co. ("Schwab"). Schwab will serve as the Client's "qualified custodian". In addition to custody services, Schwab provides Arcadia's Clients with valuable recordkeeping and research services. Arcadia, on a periodic and systematic basis, reviews its brokerage relationship with its broker-dealers/custodians to ensure that it is fulfilling its fiduciary duty to seek best execution on Client transactions.

Research provided by Schwab may include furnishing advice, either directly or through publications or writings, as to the value of securities, the advisability of purchasing or selling specific securities and the availability of purchasers or sellers of securities; furnishing seminars, information, analyses and reports concerning issuers, industries, securities, trading markets and methods, legislative developments, changes in accounting practices, economic factors and trends and portfolio strategy; access to research analysts, corporate management personnel, industry experts, economists and government officials; comparative performance evaluation and technical measurement services and quotation services; and products and other services (such as third party publications, reports and analyses, and computer and electronic access, equipment, software, information and accessories that deliver, process or otherwise use information, including the research described above, and charitable activities) that assist the registrant in carrying out its responsibilities. Research received from brokers or dealers is supplemental to Arcadia's own research efforts.

Arcadia does not enter into agreements with broker-dealers/custodians regarding specific amounts of brokerage as a result of the research provided. However, the commission rates generally paid by Arcadia's discretionary clients sufficiently allow executing brokers to provide Arcadia with fairly full array of normal research services. This may include information and products regarding the receipt of duplicate trade confirmations and account statements, trading desk access, the ability to aggregate Clients' securities transactions, the ability to directly debit advisory fees from Clients' accounts, receipt of compliance publications, access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors, access to research analysts and attendance at research seminars

Arcadia believes that it would obtain the research and other products and services provided by Schwab regardless of the amount of commissions it generates throughout the year.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. Arcadia participates in a soft dollar relationship with Schwab, where they can obtain additional benefits such as access to research and other technology platforms.

2. Brokerage Referrals - Arcadia does not receive any compensation from any third-party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”, where Arcadia will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Arcadia will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Arcadia will execute its transactions through the Custodian as authorized by the Client. Arcadia may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Arcadia. Formal reviews are generally conducted at least annually or more or less frequently depending on the Client’s needs. The President or Senior Financial Planner conducts each portfolio review.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A. above, Arcadia also reviews an account whenever there is a contribution or a withdrawal, and whenever Arcadia’s computerized monitoring system indicates that the total value of a Client’s stock market investments has moved away by more than a pre-determined amount from its targeted percentage of the portfolio.

C. Review Reports

Arcadia provides a written asset and allocation report to Clients. These reports are given at periodic in-person review meetings, mailed or emailed before periodic phone reviews, or mailed to the client without a review. The frequency of the reviews varies based on an agreement with the Client and in coordination with varying service levels based on the amount of investment assets, advisory fees, and complexity of planning.

Charles Schwab and/or other custodians also send the Clients a confirmation of transactions, and a monthly or quarterly summary report of all transactions, holdings, contributions and withdrawals.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Arcadia

Participation in Institutional Advisor Platform

Arcadia has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Arcadia. As a registered investment advisor participating on the Schwab Advisor Services platform, Arcadia receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor’s recommendation of this custodian over one that does not furnish similar software, systems support, or services.

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’s funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor

REGISTERED INVESTMENT ADVISOR

Arcadia Wealth Management 10 Edgewood Avenue Smithtown, NY 11787

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may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to Arcadia that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Arcadia believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

The Advisor does not engage paid solicitors for Client referrals.

Item 15 – Custody

If an investment advisor has the ability to access or control Client funds or securities, the investment advisor may be deemed to have custody and must ensure proper procedures are implemented. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and authorize Arcadia to utilize the Custodian for the Client’s security transactions. Arcadia encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client’s instructions.

Walter F Wisniewski, Jr. serves as a trustee on a Client’s irrevocable trusts. As trustee, Walter has custody of client assets owned by the trusts.

For accounts where Arcadia may be deemed to have custody, Arcadia has established the following procedures to comply with the SEC’s Custody Rule:

- All Client funds and securities are held at a “qualified custodian”, in a separate account for each Client under that Client’s name.
- Clients or an independent representative of the Client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian’s name, address and the manner in which the funds or securities are maintained.
- Account statements are delivered directly the qualified custodian to each Client, or the Client’s independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Arcadia. When Clients have questions about their account statements, they should contact Arcadia or the qualified custodian preparing the statement.
- Surprise Independent Examination - As Arcadia is deemed to have custody over certain Client’s assets the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which Arcadia maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC’s Investment Adviser Public Disclosure website <http://www.adviserinfo.sec.gov>.

Item 16 – Investment Discretion

Arcadia generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Arcadia. Discretionary authority will only be authorized

upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Arcadia will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Although Arcadia may have discretionary authority to make investment decisions on behalf of the client, Arcadia will not exercise proxy or class action voting authority over the client securities. The obligation to vote the client proxies and class actions will always remain with the client. The client shall in no way be prohibited from contacting Arcadia for advice or information about a particular proxy or class action vote. However, Arcadia shall not be deemed to have proxy or class action voting authority solely as a result of providing such advice to the client.

Item 18 – Financial Information

Arcadia does not have any financial condition that is reasonable likely to impair its ability to meet contractual commitments to clients. Neither the Advisor, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Arcadia is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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