

# **SilverLake Wealth Management, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 2, 2022**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

SilverLake is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about SilverLake to assist you in determining whether to retain the Advisor.

Additional information about SilverLake and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor firm name or CRD# 165525.

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## Item 2 – Material Changes

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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 Supplement provides information about Advisory Persons of SilverLake. For convenience, the Advisor has combined these documents into a single disclosure document.

SilverLake believes that communication and transparency are the foundation of its relationship and continually strives to provide you with complete and accurate information at all times. SilverLake encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

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

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 165525. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

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## Item 4 – Advisory Services

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### A. Firm Information

SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). SilverLake was organized as a Limited Liability Company (“LLC”) under the laws of the State of Vermont in March 2002. SilverLake became a registered investment advisor in December 2012. SilverLake is owned and operated by Managing Partners Richard J. Briand, Robert Eddy, Thomas Golonka, Theodore Riehle, and Jeffrey Steele. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SilverLake.

### B. Advisory Services Offered

SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans, charitable organizations, and corporations (each referred to as 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. SilverLake’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

SilverLake’s investment philosophy is customized to the needs of each Client based on a deep understanding of the Client’s long-term goals. SilverLake provides continuous personal Client contact and interaction while providing investment management and consulting services. SilverLake primarily offers discretionary and non-discretionary investment management services, but Clients may request such services to be provided on a non-discretionary basis. SilverLake works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

SilverLake will then construct a portfolio consisting of individual equity securities, individual fixed income securities, diversified mutual funds, exchange-traded funds (“ETFs”), and/or stocks to achieve the Client’s investment goals. The Advisor may also utilize other investment types, as appropriate, to meet the needs of its Clients. Diversification is sought to reduce overall portfolio risk, which can include using different asset classes as well as different sectors/industries.

Depending on the needs of each Client, SilverLake may create a customized portfolio or invest all or a portion of Client assets in its model portfolios. Each Client’s portfolio construction strategy is developed based on the Client’s need, including such factors as other investments, tax sensitivity, and/or the alignment of a SilverLake portfolio with a Client’s particular needs.

SilverLake will select, recommend and/or retain mutual funds on a fund by fund basis. Due to specific custodial and/or mutual fund company constraints, material tax consideration, and/or systematic investment plans, SilverLake will select, recommend, and/or retain a mutual fund share class that does not have trading costs but do have higher internal expense ratios than institutional share classes. SilverLake will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client’s financial objectives and stated investment guidelines.

SilverLake’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. SilverLake will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

SilverLake evaluates and selects investments for inclusion in Client portfolios only after applying their internal due diligence process. SilverLake may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SilverLake may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. SilverLake may recommend selling positions for reasons that include but are not limited to harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, changes in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

*Non-Purpose Loans* – The Advisor may introduce certain Clients to non-purpose loan programs made available through certain Custodians' banking partner affiliates ("Lending Program"). In such instances, the Client's assets in their account[s] at the Custodian will be utilized as collateral for a non-purpose loan. The recommendation of a Lending Program presents a conflict of interest as the Advisor will continue to receive investment advisory fees for managing the collateralized assets in the Client's account[s]. Clients are not obligated to engage the Advisor for the Lending Program. For additional information related to the risks involved in non-purpose loans and lines of credit, please see Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g., commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will SilverLake accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices for additional information.

#### Financial Planning Services

SilverLake will typically provide a variety of financial planning services to individuals and families pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives, and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

SilverLake may also refer Clients to an accountant, attorney, or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For planning engagements that encompass an ad-hoc analysis, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of 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 any transaction through the Advisor.

#### Retirement Plan Advisory Services

SilverLake provides retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). 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
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

SilverLake may also provide communication and education services to the Plan and its Participants, pursuant to the terms of the Advisor's agreement with each Plan Sponsor:

- Plan Participant contact by phone, email, or letter upon eligibility to promote enrollment
- Investment education
- Regular on-site advisor visits with staff for account updates and reviews
- Periodic company-wide employee survey of retirement plan understanding
- Periodic Plan Participant group education

These services are provided by SilverLake 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 SilverLake's fiduciary status, the specific services to be rendered, and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Use of Independent Managers

SilverLake will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio, based on the Client's needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with the Client's investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. Prior to entering an agreement with an Independent Manager, the Client will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

### **C. Client Account Management**

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

- Establishing an Investment Strategy – SilverLake, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.

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- Asset Allocation – SilverLake 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 – SilverLake will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – SilverLake will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

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

#### **E. Assets Under Management**

As of December 31, 2021, SilverLake manages \$447,978,277 in Client assets, of which \$414,013,163 are managed on a discretionary basis and \$33,965,114 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **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. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 0.50% to 1.50%, depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Investment advisory fees are negotiable upon the sole discretion of the Advisor, and the agreed-upon fee will be included in the investment advisory agreement. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by SilverLake will be independently valued by the Custodian. SilverLake will conduct periodic reviews of the Custodian's valuations.

##### Financial Planning Services

SilverLake offers financial planning services on an hourly basis at a rate of up to \$300 per hour or on a fixed fee basis, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or total costs will be determined prior to engaging for these services. 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. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

##### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.50% and are billed in advance, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan.

##### Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an



Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

## **B. Fee Billing**

### Investment Management Services

Investment advisory fees are calculated by the Advisor or the Custodian (on behalf of the Advisor) and deducted from the Client account[s] at the Custodian. Clients authorize the calculation and deduction of the investment advisory fee through the investment advisory agreement and the contractual arrangement[s] between the Custodian and the Client. The amount due is calculated by applying the quarterly rate (annual rate divided by four (4)) to the total assets under management with SilverLake at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the 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 advisory fees to be deducted by SilverLake from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Financial Planning Services

Financial planning fees are invoiced by the Advisor upon completion of the engagement deliverable[s] and are due upon receipt.

### Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are negotiated with the Plan Sponsor on a case-by-case basis and may be billed as a fixed quarterly fee or as a percentage of the market value of assets in the Plan at the end of the prior calendar quarter.

### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include SilverLake's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. SilverLake includes securities transactions costs as part of its overall investment advisory fee through the SilverLake Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure. The inclusion of securities transaction fees into a single bundled fee may cost the Client more or less than if paid separately.

As mentioned in Item 4.B. above, the Client may be invested into share classes of a mutual fund that have a higher expense ratio than a different share class. This may result in Clients paying higher expense ratio[s]. For a complete discussion of expenses related to each mutual fund, please read a copy of the prospectus issued by that particular fund.

In addition, all fees paid to SilverLake 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. A Client may be able to invest in these products directly, without the services of



SilverLake, but would not receive the services provided by SilverLake, which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SilverLake to fully understand the total fees to be paid. Additionally, as noted above, the Advisor will select share classes that do not have trading costs but do have higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management and Retirement Plan Advisory Services

SilverLake is compensated for its advisory services in advance of the quarter in which services are rendered. Either party may terminate the agreement with SilverLake, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's 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 Advisor will then refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Financial Planning Services

SilverLake is compensated for its financial planning services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement with SilverLake, at any time, by providing advance written notice to the other party. The Client may also 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

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

##### Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest, or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. SilverLake will assist the Client with the termination and transition as appropriate.

#### **E. Compensation for Sales of Securities**

SilverLake 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.

##### Broker-Dealer Affiliations

Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, the Advisory Person will implement securities transactions under PKS and not through SilverLake. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person, who is a registered representative, has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor or Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing

investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

#### Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because Advisory Persons providing investment advice on behalf of the Advisor, who are insurance agents, have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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SilverLake does not charge performance-based fees for its investment advisory services. The fees charged by SilverLake are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. SilverLake does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans, charitable organizations, 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. SilverLake generally does not impose a minimum size for establishing a relationship.

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

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#### **A. Methods of Analysis**

SilverLake employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research data and analysis from SilverLake are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases, and research prepared by others.

As noted above, SilverLake generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SilverLake will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, SilverLake may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria consist generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that AA will be able to accurately predict such a reoccurrence.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. SilverLake will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

### Market Risk

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e., the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

### 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 as a mutual fund purchased later that same day.

### Non-Purpose Loans and Lines of Credit

Non-purpose loans and lines of credit carry a number of risks, including but not limited to the risk of a market downturn, tax implications if collateralized securities are liquidated, and an increase in interest rates. A decline in the market value of collateralized securities held in the account[s] at the Custodian may result in a reduction in the draw amount of the Client's line of credit, a demand from the Lending Program that the Client deposit additional funds or securities in the Client's collateral account[s], or a forced sale of securities in the Client's collateral account[s].

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves 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**

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Securities laws require an advisor to disclose any instances where the Advisor or its Advisory Persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices.

You may independently view the backgrounds of the Advisor and its Advisory Persons on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 165525.

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

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### Broker-Dealer Affiliation

As noted in Item 5, certain Advisory Persons of SilverLake are also registered representatives of PKS, a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In their separate capacities as registered representatives of PKS, Advisory Persons will receive compensation for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons of SilverLake. Neither SilverLake nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

### Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons of SilverLake are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with the SilverLake. As insurance professionals, Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation, nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

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### A. Code of Ethics

SilverLake has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SilverLake ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. SilverLake and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of SilverLake associates to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may address employee ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (802) 857-5083 or via email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

### B. Personal Trading with Material Interest

SilverLake allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SilverLake does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. SilverLake does not have a material interest in any securities traded in Client accounts.

### C. Personal Trading in Same Securities as Clients

SilverLake allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of SilverLake have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades or by trading based on material non-public information. This risk is mitigated by SilverLake requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of Supervised Persons, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### D. Personal Trading at Same Time as Client

While SilverLake allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will SilverLake or any Supervised Person of SilverLake transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

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



Where SilverLake does not exercise discretion over the selection of the Custodian, the Advisor will typically recommend the Custodians to Clients. SilverLake will typically recommend Clients establish accounts at Charles Schwab, Inc. ("Schwab") or Fidelity Clearing & Custody Solutions and related divisions and entities of Fidelity Investments, Inc., including National Financial Services, LLC, and Fidelity Brokerage Services, LLC (collectively "Fidelity"). Schwab and Fidelity (each a "Custodian" and collectively the "Custodians") are FINRA-registered broker-dealers and members of SIPC and serve as the Client's "qualified custodian." SilverLake maintains institutional relationships with the Custodians, whereby the Advisor receives economic benefits from these Custodians.

Clients are not obligated to use any Custodian recommended by SilverLake; however, Because of SilverLake's affiliation with PKS, the Advisor may be limited in the services it can offer if a Custodian is selected that is not approved by PKS.

SilverLake has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Fidelity platform includes brokerage, custody, administrative support, record keeping, technology, and related services designed to support registered investment advisors like SilverLake in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

Fidelity may charge brokerage commissions (securities transaction fees) for effecting certain securities transactions. Fidelity enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

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 a broker-dealer/custodian in exchange for research and other services. **SilverLake does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**
2. **Brokerage Referrals** – SilverLake 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 SilverLake 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] at the designated Custodian. 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]). SilverLake 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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. SilverLake will execute its transactions through the Custodian as authorized by the Client.

SilverLake 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**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Principals of SilverLake, which may periodically include the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify SilverLake if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic, or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by SilverLake**

#### Participation in Institutional Advisor Platforms (Fidelity)

As noted in item 12, SilverLake has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s].

As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above.

The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. 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 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.

#### Participation in Institutional Advisor Platforms (Schwab)

SilverLake has also established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like SilverLake. As a registered investment advisor participating on the Schwab Advisor Services platform, SilverLake 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 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 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 and support to SilverLake 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 conflict of interest. SilverLake believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

## **B. Client Referrals from Solicitors**

SilverLake does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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SilverLake does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees and certain money movement authority as described below. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct SilverLake to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by SilverLake to ensure accuracy, as the Custodian does not perform this review. 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.

## **Item 16 – Investment Discretion**

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SilverLake offers its investment advisory services on either a discretionary or non-discretionary basis. For discretionary accounts, SilverLake will have the authority 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 SilverLake. 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 SilverLake will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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SilverLake does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither SilverLake nor its management has any adverse financial situations that would reasonably impair the ability of SilverLake to meet all obligations to its Clients. Neither SilverLake nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. SilverLake is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Richard J. Briand**  
**Managing Partner and Portfolio Manager**

**Effective: March 2, 2022**

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Richard J. Briand (CRD# 1045809) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Mr. Briand is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 1045809.

**SilverLake Wealth Management, LLC**  
33 Blair Park Road, Suite 100, Williston, VT 05495  
Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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The Managing Partner of SilverLake is Richard J. Briand. Mr. Briand, born in 1955, is a dedicated Portfolio Manager for Clients of SilverLake. Mr. Briand earned a Bachelor of Science degree in Accounting from Bentley University in 1978. Additional information regarding Mr. Briand's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Managing Partner and Portfolio Manager, SilverLake Wealth Management, LLC | 10/2012 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc.       | 04/2020 to Present |
| Registered Representative, LPL Financial, LLC                             | 10/2012 to 04/2020 |
| Managing Partner, Wells Fargo Financial Network, LLC                      | 05/2009 to 10/2012 |
| Managing Partner, Wachovia Securities Financial Network, LLC              | 10/2005 to 05/2009 |
| Financial Advisor, Wachovia Securities, LLC                               | 05/2003 to 10/2005 |
| Financial Advisor, Wachovia Securities, Inc.                              | 06/2002 to 05/2003 |
| Financial Advisor, First Union Securities, Inc.                           | 08/2000 to 06/2002 |

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Briand.*** Mr. Briand has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Briand.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Briand.***

However, the Advisor encourages Clients to independently view the background of Mr. Briand on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 1045809.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Briand is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Briand will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Briand. Neither the Advisor nor Mr. Briand will earn ongoing investment advisory fees in connection with any services implemented in Mr. Briand's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Briand earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Briand is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance professional, Mr. Briand will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Briand or the Advisor.

## **Item 5 – Additional Compensation**

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Mr. Briand has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Briand serves as a Managing Partner and Portfolio Manager of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Robert W. Eddy  
Managing Partner**

**Effective: March 2, 2022**

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert W. Eddy (CRD# 75378) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Robert W. Eddy is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 75378.

**SilverLake Wealth Management, LLC**  
33 Blair Park Road, Suite 100, Williston, VT 05495  
Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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Robert W. Eddy is a Managing Partner of SilverLake. Mr. Eddy, born in 1945, is dedicated to serving the Clients of SilverLake. Mr. Eddy earned a Bachelor of Science degree from Ithaca College in 1967. Additional information regarding Mr. Eddy's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Managing Partner, SilverLake Wealth Management, LLC                 | 10/2012 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc. | 04/2020 to Present |
| Registered Representative, LPL Financial, LLC                       | 10/2012 to 04/2020 |
| Managing Partner, Wells Fargo Financial Network, LLC                | 05/2009 to 10/2012 |
| Managing Partner, Wachovia Securities Financial Network, Inc.       | 06/2003 to 05/2009 |
| Managing Partner, Wachovia Securities Financial Network, LLC        | 06/2002 to 05/2003 |
| Financial Advisor, Morgan Stanley & Co., Inc.                       | 02/1978 to 04/2002 |

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Eddy.*** Mr. Eddy has never been involved in any regulatory, civil, or criminal action. There have been no Client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Eddy.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Eddy.***

However, the Advisor encourages Clients to independently view the background of Mr. Eddy on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 75378.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Eddy is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Eddy will receive commissions for the implementation of recommendations of commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Eddy. Neither the Advisor nor Mr. Eddy will earn ongoing investment advisory fees in connection with any services implemented in Mr. Eddy's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Eddy earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Eddy is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance professional, Mr. Eddy will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Eddy or the Advisor.



## **Item 5 – Additional Compensation**

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Mr. Eddy has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Eddy serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steel, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Thomas Golonka, CFA<sup>®</sup>, CFP<sup>®</sup>**  
**Managing Partner**

**Effective: March 2, 2022**

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Thomas Golonka, CFA<sup>®</sup>, CFP<sup>®</sup>, (CRD# 2209094) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Thomas Golonka is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 2209094.

**SilverLake Wealth Management, LLC**  
33 Blair Park Road, Suite 100, Williston, VT 05495  
Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

Thomas Golonka, CFA®, CFP®, is a Managing Partner of SilverLake. Mr. Golonka, born in 1967, is dedicated to serving the Clients of SilverLake. Mr. Golonka earned a Master's of Business Administration degree from Union College in 1991 and a Bachelor of Arts degree from the University of Notre Dame in 1989. Additional information regarding Mr. Golonka's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Managing Partner, SilverLake Wealth Management, LLC                 | 10/2012 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc. | 04/2020 to Present |
| Registered Representatives, LPL Financial, LLC                      | 10/2012 to 04/2020 |
| Managing Partner, Wells Fargo Advisors Financial Network, LLC       | 05/2009 to 10/2012 |
| Managing Partner, Wachovia Securities Financial Network, LLC        | 10/2005 to 5/2009  |
| Financial Advisor, Wachovia Securities, LLC                         | 06/2003 to 10/2005 |
| Financial Advisor, Wachovia Securities, Inc.                        | 08/2000 to 05/2003 |

### Chartered Financial Analyst™ ("CFA®")

The Chartered Financial Analyst™ ("CFA®") charter is a professional designation established in 1962 and awarded by CFA® Institute. To earn the CFA® charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA® Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. Also, CFA® charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by and annually reaffirm their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA® Institute.

### CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by the CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold the CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education, (2) stringent code of conduct and standards of practice, and (3) ethical requirements that govern professional engagements with clients. Currently, more than 92,000 individuals have obtained the CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that the CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). The CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three (3) years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by the CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete thirty (30) hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Golonka.*** Mr. Golonka has never been involved in any regulatory, civil, or criminal action. There have been no Client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Golonka.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Golonka.***

However, the Advisor encourages Clients to independently view the background of Mr. Golonka on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 2209094.

### Item 4 – Other Business Activities

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#### Broker-Dealer Affiliation

Mr. Golonka is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Golonka will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Golonka. Neither the Advisor nor Mr. Golonka will earn ongoing investment advisory fees in connection with any services implemented in Mr. Golonka's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Golonka earns a commission on an investment, the advisory fee will be waived by SilverLake.

#### Insurance Agency Affiliations

Mr. Golonka is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance professional, Mr. Golonka will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Golonka or the Advisor.

### Item 5 – Additional Compensation

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Mr. Golonka has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Golonka serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Jeffrey D. Steele**  
**Managing Partner and Chief Compliance Officer**

**Effective: March 2, 2022**

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey D. Steele (CRD# 2111373) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Jeffrey D. Steele is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 2111373.

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Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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Jeffrey D. Steele is a Managing Partner and the Chief Compliance Officer of SilverLake. Mr. Steele, born in 1967, is dedicated to serving the Clients of SilverLake. Mr. Steele earned a Bachelor of Arts degree in Economics from the State University of New York College at Cortland (“SUNY”) in 1989. Additional information regarding Mr. Steele’s employment history is included below.

### Employment History:

|  |                    |
|--|--------------------|
| Managing Partner & Chief Compliance Officer, SilverLake Wealth Management, LLC | 10/2012 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc.            | 04/2020 to Present |
| Financial Advisor, LPL Financial, LLC  | 10/2012 to 04/2020 |
| Managing Partner, Wells Fargo Advisors Financial Network, LLC                  | 05/2009 to 10/2012 |
| Managing Partner, Wachovia Securities Financial Network, LLC                   | 10/2005 to 05/2009 |
| Financial Advisor, Wachovia Securities, LLC                                    | 06/2003 to 10/2005 |
| Financial Advisor, Wachovia Securities, Inc.                                   | 06/2002 to 05/2003 |
| Financial Advisor, First Union Securities, Inc.                                | 04/2002 to 06/2002 |
| Financial Advisor, Morgan Stanley & Co., Inc.                                  | 10/1990 to 04/2002 |

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Steele.*** Mr. Steele has never been involved in any regulatory, civil, or criminal action. There have been no Client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Steele.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Steele.***

However, the Advisor encourages Clients to independently view the background of Mr. Steele on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 2111373.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Steele is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Steele will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Steele. Neither the Advisor nor Mr. Steele will earn ongoing investment advisory fees in connection with any services implemented in Mr. Steele’s separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Steele earns a commission on an investment, the advisory fee will be waived by SilverLake.

### Insurance Agency Affiliations

Mr. Steele is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance professional, Mr. Steele will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Steele or the Advisor.



## **Item 5 – Additional Compensation**

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Mr. Steele has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Steele serves as the Managing Partner and the Chief Compliance of SilverLake. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Theodore M. Riehle**  
**Managing Partner**

**Effective: March 2, 2022**

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Theodore M. Riehle (CRD# 1053690) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Theodore M. Riehle is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 1053690.

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[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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Theodore M. Riehle is a Managing Partner of SilverLake. Mr. Riehle, born in 1947, is dedicated to serving the Clients of SilverLake. Mr. Riehle earned a Bachelor of Science degree from the University of Vermont in 1970. Additional information regarding Mr. Riehle's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Managing Partner, SilverLake Wealth Management, LLC                 | 10/2012 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc. | 04/2020 to Present |
| Registered Representative, LPL Financial, LLC                       | 10/2012 to 11/2019 |
| Managing Partner, Wells Fargo Advisors Financial Network, LLC       | 05/2009 to 10/2012 |
| Managing Partner, Wachovia Securities Financial Network, LLC        | 06/2003 to 05/2009 |
| Managing Partner, Wachovia Securities Financial Network, Inc.       | 06/2002 to 05/2003 |
| Financial Advisor, First Union Securities Financial Network, Inc.   | 03/2002 to 06/2002 |
| Financial Advisor, Morgan Stanley & Co., Inc.                       | 01/1995 to 03/2002 |

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***There are no legal, civil, or disciplinary events requiring disclosure regarding Mr. Riehle.***

However, the Advisor encourages Clients to independently view the background of Mr. Riehle on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 1053690.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Riehle is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance professional, Mr. Riehle will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Riehle or the Advisor.

## Item 5 – Additional Compensation

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Mr. Riehle has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Riehle serves as the Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Derek G. Eddy**  
**Investment Advisor Representative**

**Effective: March 2, 2022**

This Form ADV Part 2B ("Brochure Supplement") provides information about the background and qualifications of Derek G. Eddy (CRD# 5648908) in addition to the information contained in the SilverLake Wealth Management LLC ("SilverLake" or the "Advisor," CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Mr. Eddy is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 5648908.

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Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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Derek G. Eddy is an Investment Advisor Representative with SilverLake. Mr. Eddy, born in 1984, is dedicated to advising Clients of SilverLake. Mr. Eddy earned a Bachelor's degree in Business and Economics from Bishop University in 2008. Additional information regarding Mr. Eddy's employment history is included below.

### Employment History:

|   |                    |
|---|--------------------|
| Investment Advisor Representative, SilverLake Wealth Management, LLC  | 03/2009 to Present |
| Registered Representative, Purshe Kaplan Sterling Investments, Inc.   | 04/2020 to Present |
| Registered Representative, LPL Financial, LLC                         | 12/2012 to 04/2020 |
| Registered Representative, Wells Fargo Advisor Financial Network, LLC | 05/2009 to 12/2012 |
| Sales Assistant, Wachovia Securities Financial Network, LLC           | 05/2008 to 05/2009 |

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Eddy.*** Mr. Eddy has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Eddy.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Eddy.***

However, the Advisor encourages Clients to independently view the background of Mr. Eddy on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by his full name or individual CRD# 5648908.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Eddy is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Eddy will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Eddy. Neither the Advisor nor Mr. Eddy will earn ongoing investment advisory fees in connection with any services implemented in Mr. Eddy's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Eddy earns a commission on an investment, the advisory fee will be waived by SilverLake.

## Item 5 – Additional Compensation

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Mr. Eddy has additional business activities that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Eddy serves as an Investment Advisor Representative with SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# **Form ADV Part 2B – Brochure Supplement**

## **for**

**Nathan D. Cloutier**  
**Registered Investment Advisor,**  
**Vice President, Business Development**

**Effective: March 2, 2022**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Nathan D. Cloutier (CRD# 730365) in addition to the information contained in the SilverLake Wealth Management, LLC (“SilverLake” or the “Advisor,” CRD# 165525) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).

Additional information about Mr. Cloutier is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 730365.

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Phone : (802) 857-5083 | Fax : (802) 857-5082  
[www.silverlakewealth.com](http://www.silverlakewealth.com)

## Item 2 – Educational Background and Business Experience

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Nathan D. Cloutier, born in 1979, is dedicated to advising Clients of SilverLake as an Investment Advisor Representative and Vice President, Business Development. Mr. Cloutier earned a Self-Designed major in Advertising, Bachelor of Science degree from the College of Agriculture and Life Sciences from the University of Vermont in 2002. Additional information regarding Mr. Cloutier's employment history is included below.

### Employment History:

|  |                    |
|--|--------------------|
| Registered Investment Advisor, Vice President, Business Development, SilverLake Wealth Management, LLC | 09/2020 to Present |
| Executive Director, Business Development, Vermont Expos, Inc. DBA Vermont Lake Monsters                | 12/2014 to 09/2020 |
| General Manager, Vermont Expos, Inc. DBA Vermont Lake Monsters   | 10/2009 to 12/2014 |

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Cloutier.*** Mr. Cloutier has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Cloutier.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Cloutier.***

However, the Advisor encourages Clients to independently view the background of Mr. Cloutier on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 730365.

## Item 4 – Other Business Activities

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Mr. Cloutier is dedicated to the investment advisory activities of SilverLake's Clients. Mr. Cloutier does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Cloutier is dedicated to the investment advisory activities of SilverLake's Clients. Mr. Cloutier does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Cloutier serves as the Vice President, Business Development of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective: March 2, 2022

### Our Commitment to You

SilverLake Wealth Management, LLC ("SilverLake" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. SilverLake (also referred to as "we," "our," and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

SilverLake does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

|  |                                 |
|--|---------------------------------|
| Social security or taxpayer identification number  | Assets and liabilities          |
| Name, address, and phone number[s]                 | Income and expenses             |
| Email address[es]                                  | Investment activity             |
| Account information (including other institutions) | Investment experience and goals |

### What sources do we collect information from in addition to you?

|   |   |
|---|---|
| Custody, brokerage, and advisory agreements   | Account applications and forms                      |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others   | Other information needed to service account         |

### How we share your information?

RIAs do need to share personal information regarding their clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

| Basis for sharing  | Sharing  | Limitations   |
|--|--|---|
| <p><b>Servicing our Clients</b><br/> We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Processing transactions;</li> <li>• General account maintenance;</li> <li>• Responding to regulators or legal investigations; and</li> <li>• Credit reporting, etc.</li> </ul> <p>We are required to share your information with Purshe Kaplan Sterling Investments, Inc. due to the affiliation of our advisory persons as registered representatives of PKS.</p> | <p>SilverLake may share this information.</p>                                  | <p>Clients cannot limit the Advisor's ability to share.</p> |
| <p><b>Administrators</b><br/> We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>  | <p>SilverLake may share this information.</p>                                  | <p>Clients cannot limit the Advisor's ability to share.</p> |
| <p><b>Marketing Purposes</b><br/> SilverLake does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where SilverLake or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>   | <p>SilverLake does not share personal information.</p>                         | <p>Clients cannot limit the Advisor's ability to share.</p> |
| <p><b>Authorized Users</b><br/> In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent[s] or representative[s].</p>   | <p>SilverLake does share personal information.</p>                             | <p>Clients can limit the Advisor's ability to share.</p>    |
| <p><b>Information About Former Clients</b><br/> SilverLake does not disclose and does not intend to disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p>  | <p>SilverLake does not share personal information regarding former clients</p> | <p>Clients can limit the Advisor's ability to share.</p>    |

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic safeguards. These include computer safeguards such as passwords, secured files, and buildings.

Our employees are advised about SilverLake's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

### Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### State-Specific Regulations

#### Vermont

In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties, we will only disclose your name, address, other contact information, and general information about our experience with you.

**Questions:** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (802) 857-5083 or by email at [info@silverlakewealth.com](mailto:info@silverlakewealth.com).