

# **S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management**

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

**Effective: February 22, 2024**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management (“Yes Wealth Management” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (651) 426-5854.

Yes Wealth Management 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 Yes Wealth Management to assist you in determining whether to retain the Advisor.

Additional information about Yes Wealth Management 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’s firm name or CRD# 172591.

**S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management**  
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Phone: (651) 426-5854 | Fax: (651) 429-5809  
[www.yeswealth.com](http://www.yeswealth.com)

## 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 Yes Wealth Management. For convenience, the Advisor has combined these documents into a single disclosure document.

Yes Wealth Management believes that communication and transparency are the foundations of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Yes Wealth Management 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.

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# 172591. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 651-426-5854.

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## Item 4 – Advisory Business

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### A. Firm Information

S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management (“Yes Wealth Management” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. Yes Wealth Management was founded in July 2014 and is owned and operated by Robert E. Schneeweis (Chief Executive Officer), Thomas R. Schneeweis (Chief Investment Officer), Sarah L. Johnson (President), and Robert J. Schneeweis (Chief Operating Officer and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Yes Wealth Management.

### B. Advisory Services Offered

Yes Wealth Management offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans (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 toward each Client and seeks to mitigate potential conflicts of interest. Yes Wealth Management’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

Yes Wealth Management provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Yes Wealth Management works closely with each Client to identify their investment goals and objectives, as well as their risk tolerance, and to analyze their financial situation in order to create a portfolio strategy. Yes Wealth Management will then construct a portfolio consisting primarily of exchange-traded funds (“ETFs”) and low-cost, diversified mutual funds to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, individual bonds, and other types of investments, as appropriate, to meet the needs of certain Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Yes Wealth Management’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. Yes Wealth Management 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 acceptance by the Advisor.

Yes Wealth Management evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Yes Wealth Management may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Yes Wealth Management 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. Yes Wealth Management 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.

At no time will Yes Wealth Management 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 their designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*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 the 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 will earn a new (or increase 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.

*Financial Planning Services* – In certain instances, Yes Wealth Management will provide a variety of financial planning and consulting services to Clients as a component of investment management services. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives. This planning may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, and other areas of a Client’s financial situation.

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 the transaction through the Advisor.

#### Retirement Plan Advisory Services

Yes Wealth Management provides retirement plan advisory services to various retirement plans (each a “Plan”) and the sponsor of the Plan (the “Plan Sponsor”). A Plan Sponsor may engage Yes Wealth Management to serve as a 3(38) Fiduciary (discretionary) to the Plan in support of the Plan Sponsor’s fiduciary role. As a 3(38) Fiduciary, the Plan Sponsor shall authorize Yes Wealth Management to serve as a discretionary investment advisor to select and implement the investment options for the Plan and Plan Participants. Retirement plan advisory services generally include:

- Assist with the development and monitoring of an Investment Policy Statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan.
- Assist the Plan Sponsor with the selection and the broad range of investments for the Plan.
- 3(38) Discretionary Services. The Advisor will have the discretionary authority and will make the final decision regarding the initial selection, retention, removal, and additions to the investments in the Plan.
- Provide discretionary investment advice to the Plan and Plan Sponsor with respect to the Plan’s qualified default investment alternative (“QDIA”) for Plan Participants who are automatically enrolled in the Plan or have failed to make investment elections. The Plan Sponsor retains the sole responsibility to provide notices to the Plan Participants as required under ERISA 404(c).

In addition, Yes Wealth Management may provide the following non-fiduciary services:

- Assist with Plan Participant education regarding general investment topics and investment options in the Plan.
- Assist in group enrollment meetings designed to increase retirement plan participation among employees.
- Assist in the monitoring of investment options by preparing periodic investment reports regarding investment performance, consistency of fund management, and conformance to guidelines set forth in the IPS. Make recommendations to maintain, remove or replace investment options.
- Meet with the Plan Sponsor on a periodic basis to discuss reports and investment recommendations for the Plan.

**The Advisor is not obligated to advise the Plan, Plan Sponsor, or Plan Participant on other types of investments. The Advisor may be engaged under a separate agreement to provide additional services.**

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

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

- Establishing an Investment Strategy – Yes Wealth Management, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Yes Wealth Management will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk of each Client.
- Portfolio Construction – Yes Wealth Management will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Yes Wealth Management will provide investment management and ongoing oversight of the Client's investment portfolio.

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

Yes Wealth Management does not manage or place Client assets into a wrap fee program. Investment advisory services are provided directly by Yes Wealth Management.

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

As of December 31, 2023, Yes Wealth Management manages \$113,408,123 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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 management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment management agreement. Investment management fees are based on the market value of assets under management at the end of the prior calendar quarter.

Investment management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
First \$750,000	1.00%
Next \$750,000	0.75%
Next \$1,500,000	0.50%
Over \$3,000,000	Negotiable

The investment management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may have a fixed fee arrangement or fee schedule that differs from the above. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Yes Wealth Management will be independently valued by the Custodian. Yes Wealth Management will conduct periodic reviews of the Custodian's valuations.

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#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are generally charged an annual asset-based fee, billed quarterly, in advance of each calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan. Fees are generally based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
First \$750,000	1.00%
Next \$750,000	0.75%
Next \$1,500,000	0.50%
Over \$3,000,000	Negotiable

Certain existing Clients may have fee schedules that differ from the schedule above.

The Advisor's fee is exclusive of and in addition to, any applicable securities transaction and custody fees and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### **B. Fee Billing**

##### Investment Management Services

Investment management fees are calculated by the Advisor or its delegate and typically deducted from the Client's account[s] at the Custodian. In limited circumstances, certain Clients may have arrangements to pay the Advisor directly. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by the number of days in the year, multiplied by the number of days in the quarter) to the total assets under management with Yes Wealth Management at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the investment management 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 Yes Wealth Management directly from their account[s] held by the Custodian as part of the investment management agreement and separate account forms provided by the Custodian.

##### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

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

Clients may incur certain fees or charges imposed by third parties other than Yes Wealth Management in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Yes Wealth Management are separate and distinct from these custody and execution fees.

In addition, all fees paid to Yes Wealth Management 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 Yes Wealth Management, but would not receive the services provided by Yes Wealth Management, which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Yes Wealth Management to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

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

### Investment Management Services

Yes Wealth Management is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment management 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. Upon termination, the Advisor will refund any unearned, prepaid investment management fees from the effective date of termination to the end of the quarter. The Client's investment management agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

Yes Wealth Management is compensated for its retirement plan advisory services in advance of the quarter in which 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 may also terminate the retirement plan 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. Upon termination, the Advisor will refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

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

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Yes Wealth Management does not charge performance-based fees for its investment advisory services. The fees charged by Yes Wealth Management are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. Yes Wealth Management 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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Yes Wealth Management offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and retirement plans. These amounts may change over time and are updated at least annually by the Advisor. Yes Wealth Management does not require a minimum size to establish a relationship.

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

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

Yes Wealth Management employs fundamental analysis and risk-managed asset allocation in developing investment strategies for its Clients. Research and analysis from Yes Wealth Management are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and reviews of company activities, including annual reports, prospectuses, press releases, and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria generally consist 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. 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 a 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.



As noted above, Yes Wealth Management generally employs a long-term investment approach for its Clients, as consistent with their financial goals. Yes Wealth Management 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, Yes Wealth Management 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.

## **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. Yes Wealth Management 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 Risks

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.

### 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.

### 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.

**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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**There are no legal, regulatory, or disciplinary events involving Yes Wealth Management or any of its management persons.** Yes Wealth Management values the trust Clients place in the Advisor. The Advisor encourages all Clients to perform the requisite due diligence on any advisor or service provider with whom the Client engages. The backgrounds of the Advisor and its Advisory Persons are available 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# 172591.

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

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### **A. Broker-Dealer Affiliation**

The Advisor is not affiliated with a broker-dealer.

### **B. Futures Merchant**

Neither the Advisor nor its Advisory Persons have any registrations or affiliations with a futures commission merchant, commodity pool operator, or commodity-trading advisor.

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

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### **A. Code of Ethics**

Yes Wealth Management has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Yes Wealth Management ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Yes Wealth Management and its Supervised Persons owe a duty of loyalty, fairness, and good faith toward each Client. It is the obligation of Yes Wealth Management's Supervised Persons to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at 651-426-5854.

### **B. Personal Trading with Material Interest**

Yes Wealth Management allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Yes Wealth Management 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. Yes Wealth Management does not have a material interest in any securities traded in Client accounts.

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

Yes Wealth Management 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 the Code to address insider trading (material, nonpublic information controls); gifts and entertainment; outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons 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 nonpublic information. This risk is mitigated by Yes Wealth Management requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, nonpublic information.

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

While Yes Wealth Management 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 Yes Wealth Management, or any Supervised Person of Yes Wealth Management, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

Yes Wealth Management 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 Yes Wealth Management to direct trades to the Custodian as agreed upon in the investment advisory agreement. Furthermore, Yes Wealth Management does not have the discretionary authority to negotiate commissions on behalf of its Clients on a trade-by-trade basis.

Where Yes Wealth Management does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by Yes Wealth Management. However, if the recommended Custodian is not engaged, the Advisor may be limited in the services it can provide. Yes Wealth Management may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. Yes Wealth Management typically recommends to Clients that they establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian." Yes Wealth Management maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

The 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. **Yes Wealth Management does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from Schwab as the Custodian. Please see Item 14 below.**
2. **Brokerage Referrals** – Yes Wealth Management 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 Yes Wealth Management will place trades within the established account[s] at the Custodian designated by the Client. Furthermore, all Client accounts are traded within their respective account[s] at the 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]). Yes Wealth Management 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. Yes Wealth Management will execute its transactions through the Custodian as directed by the Client. Yes Wealth Management may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. 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 any 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 Robert J. Schneeweis, Chief Compliance Officer of Yes Wealth Management. 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 Yes Wealth Management if changes occur in the Client's personal financial situation that might adversely affect the Client's 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 Yes Wealth Management**

Yes Wealth Management is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Yes Wealth Management does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. Yes Wealth Management may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Yes Wealth Management may receive non-compensated referrals of new Clients from various third parties.

### Participation in the Institutional Advisor Platform

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

## **B. Compensation for Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

## **Item 15 – Custody**

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Yes Wealth Management does not accept or maintain custody of any Client accounts except for the authorized deduction of the Advisor's fees. 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 Yes Wealth Management to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by Yes Wealth Management to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

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Yes Wealth Management generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Yes Wealth Management. 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 Yes Wealth Management will be in accordance with each Client's investment objectives and goals.

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

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Yes Wealth Management 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 Yes Wealth Management nor its management has any adverse financial situations that would reasonably impair the ability of Yes Wealth Management to meet all obligations to its Clients. Neither Yes Wealth Management nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. Yes Wealth Management is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

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

**for**

**Robert E. Schneeweis  
Chief Executive Officer**

**Effective: February 22, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert E. Schneeweis (CRD# 2012770) in addition to the information contained in the S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management (“Yes Wealth Management” or the “Advisor,” CRD# 172591) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Yes Wealth Management Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (651) 426-5854.

Additional information about Mr. Schneeweis 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# 2012770.



## Item 2 – Educational Background and Business Experience

Robert E. Schneeweis, born in 1951, is dedicated to advising Clients of Yes Wealth Management as the Chief Executive Officer. Mr. Schneeweis earned a Master of Business Administration degree from the University of St. Thomas in 1980. Mr. Schneeweis also earned a Bachelor of Science degree in Accounting and Finance from St. John's University in 1973. Additional information regarding Mr. Schneeweis's employment history is included below.

### Employment History:

Chief Executive Officer, S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management	01/2015 to Present
Investment Advisor Representative, VSR Advisory Services, Inc.	08/1997 to 01/2015
Registered Representative, VSR Financial Services, Inc.	01/1996 to 01/2015

## Item 3 – Disciplinary Information

***There are no legal, civil, or disciplinary events to disclose regarding Mr. Schneeweis.*** Mr. Schneeweis 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. Schneeweis. 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. Schneeweis.*** However, the Advisor does encourage you to independently view the background of Mr. Schneeweis 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# 2012770.

## Item 4 – Other Business Activities

Mr. Schneeweis is dedicated to the investment advisory activities of Yes Wealth Management Clients. Mr. Schneeweis does not have any other business activities.

## Item 5 – Additional Compensation

Mr. Schneeweis is dedicated to the investment advisory activities of Yes Wealth Management Clients. Mr. Schneeweis does not receive any additional forms of compensation.

## Item 6 – Supervision

Mr. Schneeweis serves as the Chief Executive Officer of Yes Wealth Management and is supervised by Robert J. Schneeweis, the Chief Compliance Officer. Robert J. Schneeweis can be reached at (651) 426-5854.

Yes Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Yes Wealth Management. Furthermore, Yes Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Yes Wealth Management and its Supervised Persons. As a registered entity, Yes Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Yes Wealth Management 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**

**Sarah L. Johnson  
President**

**Effective: February 22, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Sarah L. Johnson (CRD# 6398271) in addition to the information contained in the S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management (“Yes Wealth Management” or the “Advisor,” CRD# 172591) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Yes Wealth Management Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (651) 426-5854.

Additional information about Mrs. Johnson is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 6398271.

## Item 2 – Educational Background and Business Experience

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Sarah L. Johnson, born in 1982, is dedicated to advising Clients of Yes Wealth Management as the President. Mrs. Johnson earned a Master of Science degree from the University of Wisconsin – Stout in 2010. Mrs. Johnson also earned a Bachelor of Science degree from the College of St. Benedict in 2005. Additional information regarding Mrs. Johnson's employment history is included below.

### Employment History:

President, S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management	01/2015 to Present
Director of Marketing, S Capital Management, LLC d/b/a Yes Wealth Management	08/2014 to 01/2015
Registered Dietitian, The Emily Program	08/2013 to 08/2014
Registered Dietitian, Park Nicollet	06/2007 to 08/2013
Registered Dietitian, Walker Methodist Health Center	06/2005 to 06/2007

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mrs. Johnson.*** Mrs. Johnson has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mrs. Johnson. 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 Mrs. Johnson.*** However, the Advisor does encourage you to independently view the background of Mrs. Johnson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or individual CRD# 6398271.

## Item 4 – Other Business Activities

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### Century College Foundation

Mrs. Johnson, in her separate capacity, is a board member of the Century College Foundation, an educational organization located in White Bear Lake, MN. Mrs. Johnson is part of the finance committee. Mrs. Johnson spends approximately one (1) hours per month and is not compensated in this position.

### St. Jude of the Lake Catholic Church and School

Mrs. Johnson, in her separate capacity, is a board member of the St. Jude of the Lake Catholic Church and School, an educational organization located in Mahtomedi, MN. Mrs. Johnson is part of the finance council. Mrs. Johnson spends approximately two (2) hours per month and is not compensated in this position.

## Item 5 – Additional Compensation

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Mrs. Johnson has additional business activities that are detailed in Item 4 above.

## Item 6 – Supervision

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Mrs. Johnson serves as the President of Yes Wealth Management and is supervised by Robert J. Schneeweis, the Chief Compliance Officer. Robert J. Schneeweis can be reached at (651) 426-5854.

Yes Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Yes Wealth Management. Furthermore, Yes Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Yes Wealth Management and its Supervised Persons. As a registered entity, Yes Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Yes Wealth Management 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**

**James M. Heflin  
Senior Strategic Advisor**

**Effective: February 22, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James M. Heflin (CRD# 6609854) in addition to the information contained in the S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management (“Yes Wealth Management” or the “Advisor,” CRD# 172591) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Yes Wealth Management Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (651) 426-5854.

Additional information about Mr. Heflin 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# 6609854.

## Item 2 – Educational Background and Business Experience

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James M. Heflin, born in 1955, is dedicated to advising Clients of Yes Wealth Management as a Senior Strategic Advisor. Mr. Heflin earned a Master of Business Administration degree from the University of California – Los Angeles in 1993. Mr. Heflin also earned a Bachelor of Arts degree in History from the University of California – Irvine in 1978. Additional information regarding Mr. Heflin's employment history is included below.

### Employment History:

Senior Strategic Advisor, S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management	02/2016 to Present
Director, General Mills	12/1979 to 01/2015

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Heflin.*** Mr. Heflin 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. Heflin. 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. Heflin.*** However, the Advisor does encourage you to independently view the background of Mr. Heflin 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# 6609854.

## Item 4 – Other Business Activities

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Mr. Heflin is dedicated to the investment advisory activities of Yes Wealth Management's Clients. Mr. Heflin does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Heflin is dedicated to the investment advisory activities of Yes Wealth Management's Clients. Mr. Heflin does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Heflin serves as a Senior Strategic Advisor of Yes Wealth Management and is supervised by Robert J. Schneeweis, the Chief Compliance Officer. Robert J. Schneeweis can be reached at (651) 426-5854.

Yes Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Yes Wealth Management. Furthermore, Yes Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Yes Wealth Management and its Supervised Persons. As a registered entity, Yes Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Yes Wealth Management 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

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Effective: February 22, 2024

### Our Commitment to You

S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management ("Yes Wealth Management" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Yes Wealth Management (also referred to as "we," "our," and "us") 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.

Yes Wealth Management does not sell your nonpublic, personal information to anyone. Nor do we provide such information to others except for discrete and reasonable 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, nonpublic information is collected and used are set forth in this Policy.

### Why do you need to know?

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

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

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 the account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies regarding the transmission of data. Our associates are trained on their responsibilities regarding the protection of Clients' personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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**S Capital Wealth Advisors, LLC d/b/a Yes Wealth Management**

86 Mahtomedi Avenue, Mahtomedi, MN 55115

Phone: (651) 426-5854 | Fax: (651) 429-5809

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



### How do we share your information?

An RIA shares Clients' personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share nonpublic, personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, and other financial institutions) as necessary for us to provide agreed-upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Yes Wealth Management 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 Yes Wealth Management 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>	No	Not Shared
<b>Authorized Users</b> Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Yes Wealth Management does not disclose and does not intend to disclose nonpublic, personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically, we may revise this 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 nonpublic, 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.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 651-426-5854.