

Registered as Drucker Wealth, LLC | CRD No. 328909



# DRUCKER WEALTH

Financial Planning | Wealth Management



## Form ADV Part 2A – Firm Disclosure Brochure

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**February 08, 2024**

This brochure provides information about the qualifications and business practices of Drucker Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at Phone: (212) 681-0460 Fax: (419) 735-0158. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Drucker Wealth, LLC is also 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 No: 328909. Registration does not imply a certain level of skill or training.

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**Item 2 – Material Changes**

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Drucker Wealth, LLC is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure. Annually, a complete Disclosure Brochure will be offered to Clients along with a summary of material changes, if any, within 120 days from the firm's fiscal year-end.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the firm name or CRD number 328909. A copy of this Disclosure Brochure may be requested at any time, by contacting (212) 681-0460.

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## Item 4 – Advisory Services

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### Firm Information

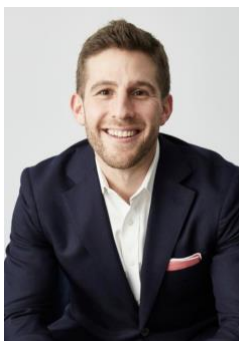
Drucker Wealth, LLC is a third-generation based in New Jersey with virtual operations across the country. The firm is organized as a limited liability company (“LLC”) under the laws of New Jersey. Drucker Wealth, LLC registered as an investment advisor with the U.S. Securities and Exchange Commission (“SEC”) in 2024. This Disclosure Brochure provides information regarding the qualifications, business practices, and advisory services provided by Drucker Wealth, LLC.

### Principal Owners



**Lance S. Drucker, ChFC® CLU® AIF®**  
Chairman

Lance Drucker has over 30 years of industry experience and a B.S. in accounting and finance from SUNY Binghamton. He also earned the Chartered Financial Consultant (ChFC®) designation, Chartered Life Underwriter (CLU®) designation and Accredited Investment Fiduciary (AIF®) designation. He also earned a Certificate in Retirement Income Planning from the Wharton School of Business.



**Gideon B. Drucker, CFP®, AIF®, ECA**  
President

Gideon Drucker, CERTIFIED FINANCIAL PLANNER™, Accredited Investment Fiduciary® and Equity Compensation Associate® is the Founder and Director of the Wealth Builder Division at Drucker Wealth, LLC. Gideon is the author of the book, "How To Avoid HENRY Syndrome®" and created the HENRY Syndrome® suite of services as a way to educate and empower **high earners not rich yet**, newlyweds, and young families to make smart financial decisions for their futures.

Gideon graduated from Lehigh University before serving as a combat paratrooper in the Israel Defense Force.

### Financial Planning

Drucker Wealth, LLC focuses on financial planning as part of a comprehensive asset management engagement or as a stand-alone service. The type of planning can vary greatly depending on the scope and complexity of an individual's financial situation. Examples of the type of planning available include the following:

#### **Tax Planning**

Drucker Wealth, LLC provides tax planning to help minimize a client tax liabilities.

#### **Equity Compensation Planning**

Drucker Wealth, LLC provides tips to clients employed at tech and media companies such as reviewing benefits, restricted stock options, vesting schedules, and plan contribution limits.

#### **Investment Management**

Once a plan is completed, Drucker Wealth, LLC can help execute the investment strategy based on risk tolerance, tax situation and a client's unique financial circumstances. Drucker Wealth will monitor the investment program and make changes as circumstances warrant based on the science of investing and behavioral economics.

#### **Insurance & Estate Planning**

Insurance and estate planning incorporates income, expenses, taxes, insurances, short term & long-term financial goals to help determine efficient tax management, protection and distribution objectives

## **Asset Management**

Drucker Wealth, LLC offers discretionary<sup>1</sup> asset management in addition to financial planning services primarily to individuals, high net worth individuals, and small business owners (each referred to as a “client”). Investment accounts are maintained at National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, “Fidelity”) or Altruist Financial, LLC, both FINRA<sup>2</sup>/SIPC<sup>3</sup> member broker/dealers to serve as the custodian for client funds (“Custodian”). There is generally a minimum dollar amount of \$2,500 required to open or maintain an account. Investment advice is not limited to certain types of investments. Advisory services are tailored to the individual needs of clients who may impose restrictions on investing in certain securities or types of securities.

## **Wrap Fee Program**

Transaction fees are paid by Drucker Wealth, LLC instead of the client, which make the advisory accounts offered by Drucker Wealth, LLC a wrap fee program<sup>4</sup>. Clients should understand that the cost of transaction charges can be a factor that Drucker Wealth, LLC considers when deciding which securities to select and how frequently to place transactions.

Drucker Wealth, LLC has a financial incentive to recommend Class A Shares in cases where both Class A and Platform Shares are available. This is a conflict of interest which might incline Drucker Wealth, LLC, consciously or unconsciously, to render advice that is not disinterested. Drucker Wealth, LLC does not pay transaction charges for Class A Share mutual fund transactions or Platform Share mutual fund transactions. The cost<sup>5</sup> to Drucker Wealth, LLC of transaction charges can be a factor Advisor considers when deciding which securities to select and whether or not to place transactions in the account.

- Please see *Appendix 1 –Wrap Fee Program Brochure*, which is included as a supplement to this Disclosure Brochure.

## **Direct Indexing**

This program is generally for non-qualified accounts only and will consist of directly holding individual stock positions that make up an index instead of using a mutual fund or an ETF to track the underlying index. A direct indexing fee is assessed in lieu of internal expenses associated with index mutual funds and ETF’s.

## **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

1. Leave the money in his/her former employer’s plan, if permitted
2. Rollover the assets to his/her new employer’s plan if one is available and permitted
3. Rollover to an Individual Retirement Account (IRA), or
4. Cash out the account value, which has significant tax considerations

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<sup>1</sup> Client grants Advisor ongoing and continuous authority to execute its investment recommendations without the Client's prior approval of each specific transaction. Under this authority, Client shall allow Advisor to purchase and sell securities and instruments in this Account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the Client in all matters necessary or incidental.

<sup>2</sup> FINRA (Financial Regulatory Authority) is dedicated to investor protection and market integrity through effective and efficient regulation of the securities industry. FINRA is not part of the government but an independent, not-for-profit organization authorized by Congress to protect America’s investors by making sure the securities industry operates fairly and honestly. <http://www.finra.org>.

<sup>3</sup> SIPC (Securities Investors Protection Corporation) was created under the Securities Investor Protection Act as a non-profit membership corporation. SIPC oversees the liquidation of member broker-dealers that close when the broker-dealer is bankrupt or in financial trouble, and customer assets are missing. <http://sipc.org>

<sup>4</sup> A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services, such as, portfolio management, advice, and investment research as well as trade execution, custody, and reporting fee.

<sup>5</sup> The lack of transaction charges to Drucker Wealth, LLC for Class A Share purchases and sales, together with the fact that Platform Shares generally are less expensive for a client to own, presents a significant conflict of interest between Drucker Wealth, LLC and the client. In short, it costs less to recommend and select Class A share mutual funds than Platform shares, but Platform shares will generally outperform Class A mutual fund shares on the basis of internal cost structure alone. Clients should understand this conflict and consider the additional indirect expenses borne as a result of the mutual fund fees when negotiating and discussing fees.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

- Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
- Employer retirement plans generally have a more limited investment menu than IRAs.
- Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
- Your current plan may have lower fees.

If a client elects to roll the assets to an IRA that is subject to our management, we will charge an asset-based fee as set forth in an agreement executed with our firm. This practice presents a conflict of interest because Investment Advisor Representatives have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if a client completes the rollover, they are under no obligation to have the assets in an IRA managed by Drucker Wealth, LLC.

Many employers permit former employees to keep their retirement assets in the company plan. Also, current employees can sometimes move assets out of the company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of each. An employee will typically be investing only in mutual funds, you should understand the cost structure of the share classes, available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA. Clients should understand the various products and services they might take advantage of at an IRA provider and the potential costs of those products and services.

- The Drucker Wealth, LLC strategy may have higher risk than the option(s) provided in an employer plan.
- A client's employer plan may also offer financial advice.
- If a client keeps their assets titled in a 401k or retirement account, they could potentially delay required minimum distributions.
- A 401(k) may offer more liability protection than a rollover IRA; each state may vary.
- Clients may be able to take out a loan on their 401k, but not from an IRA.
- IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or home purchase.
- If company stock is owned in a plan, participants may be able to liquidate those shares at a lower capital gains tax rate.
- Plans may allow Advisor to be hired as the manager and keep the assets titled in the plan name.

Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.

It is important to understand the differences between these types of accounts and to decide whether a rollover is the best option. Prior to proceeding, if you have questions contact your Investment Adviser Representative, or call our main number as listed on the cover page of this brochure.

Drucker Wealth, LLC generally provides educational services to retirement plan participants with assets that could potentially be rolled-over to an IRA advisory account. Education is based on a particular Client's financial circumstances and best interests. Again, Drucker Wealth, LLC has an incentive to recommend such a rollover based on the compensation received, which is mitigated by the fiduciary duty to act in a client's best interest and acting accordingly.



If Drucker Wealth, LLC provides investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and,
- Give you basic information about conflicts of interest.

#### **Order Management System**

Drucker Wealth, LLC provides an additional service for accounts not directly held in our custody but where we do have discretion and can leverage an Order Management System<sup>6</sup> to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts and other assets we do not custody. We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary.

A fee will be assessed and billed quarterly. Specifically, the exact amount charged is determined by the account balance as of the end of the quarter. If Drucker Wealth, LLC only manages assets for part of a quarter, the charge will be prorated. The fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets resulting in a combined weighted fee.

#### **Asset Under Management**

As of February 12, 2024 the assets under management are:

Discretionary	Non-Discretionary
\$0.00	\$0.00

Clients may request more current information at any time.

#### **Business Continuity Plan**

Drucker Wealth, LLC has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions that could impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions. Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business. The plan includes the following:

- Alternate locations to conduct business
- Hard and electronic back-ups of records
- Alternative means of communications with employees, clients, critical business constituents and regulators; and Details on the firms' employee succession plan.

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

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<sup>6</sup> <https://pontera.com>

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## **Item 5 – Fees and Compensation**

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### **Financial Planning Services**

Depending on the circumstances, Drucker Wealth, LLC charges a fixed generally ranging from \$3,000 to \$8,000 for financial planning. The client-specific fee is based on the scope and complexity of the engagement.

### **Asset Under Management**

The investment advisory fees in the first quarter of the Agreement shall be prorated from the inception date to the end of the first billing cycle according to the below fee schedule:

<b>Assets Under Management</b>	<b>Fixed Fee</b>	<b>Percentage of Assets</b>
Under \$250,000	\$2,500	1%
\$250,001 - \$1,000,000	\$0.00	1%
\$1,000,000 - \$2,000,000	\$0.00	.85%
Above \$2,000,000	\$0.00	Negotiable

### **Third Party Asset Management Programs (“TAMP”)**

Drucker Wealth, LLC has the ability to select other investment advisors or introduce Third-Party Asset Management Programs (“TAMP”) by referral or sub-advisory arrangement. A third-party asset management program is an investment advisor selected to manage client assets on behalf of Drucker Wealth, LLC. The process begins with a thorough assessment of the client's financial situation, investment objectives, risk tolerance, and time horizon. Once an investment strategy is established and approved by the client, the third-party asset manager takes responsibility for implementing and managing the portfolio. This includes buying and selling securities, rebalancing the portfolio periodically to maintain the desired asset allocation, and making adjustments based on market conditions or changes in the client's objectives.

### **Sub-advisory Agreement**

A sub-advisory agreement is a contractual arrangement between two registered investment advisors, where one firm (the "sub-advisor") is hired by another firm (Drucker Wealth, LLC) to manage all or a portion of the assets of a specific investment fund or client account. In this arrangement, Drucker Wealth, LLC retains overall responsibility for the management of the client account, while delegating all or a portion of the investment decisions and portfolio management functions to the sub-advisor.

The sub-advisory agreement outlines the terms and conditions of the collaboration between the two firms, including the scope of the sub-advisor's responsibilities, the compensation structure, and any other relevant terms. The agreement will clearly define the specific duties and responsibilities of the sub-advisor. This can include investment strategy, asset allocation, security selection, risk management, and performance reporting. The compensation structure for the sub-advisor is usually outlined in the agreement. Compensation can be a fixed fee, a percentage of assets under management, or a combination of both. The agreement also addresses any additional fees or expenses that the sub-advisor is entitled to receive.

The non-exclusive functions of a sub-advisor generally include determining the composition and portfolio allocation, the nature and timing of the changes therein and the manner of implementing such changes, investment monitoring, and research. Drucker Wealth, LLC delegates to the Sub-Advisor the power and authority to effectuate its investment decisions, including the execution and delivery of all investment related documents, placing trades, and billing. A sub-advisor has a fiduciary duty to Drucker Wealth, LLC and it's clients.

### **Fee Billing**

Fees are charged quarterly in advance or in arrears based on the market value of the client's account(s), as determined by the custodian, on the last business day of the quarter; provided, however, that for the initial quarter, fees are charged on a pro-rated basis based on the market value of the client's account(s), as determined by the custodian, on the last business day of the initial quarter. For partial quarters, fees are pro-rated. All unearned fees will be refunded to the client in the event the client terminates our services. Unless other arrangements are made, fees are directly debited from a client's account(s), and each client is required to provide the qualified custodian of the client's account(s) written authorization to deduct the fees described.



### **Mutual Fund Share Class Disclosure and Fiduciary Duty (12b-1 Fees)**

Section 206 of the Investment Advisers Act of 1940 (“Advisers Act”) imposes a fiduciary duty to act in a client’s best interests and specifically prohibits investment advisers, directly or indirectly, from engaging in any transaction, practice, or course of business which operates as a fraud or deceit upon any client or prospective client. However, the fiduciary duty to which advisers are subject is not specifically defined in the Advisers Act or the Commission rules but reflects a Congressional recognition “of the delicate fiduciary nature of an investment advisory relationship” as well as a Congressional intent to eliminate, or at least expose, all conflicts of interest which might incline an investment adviser, consciously or unconsciously, to render advice which was not disinterested. When selecting a mutual fund for a client’s advisory account, the investment advisor representative has a fiduciary duty to select the share class that helps manage the overall fee structure of the account.

### **Mutual Fund Fees and Other Fees and Expenses**

Client assets are primarily invested in mutual funds managed by third parties. The funds pay their investment managers and other service providers fees, which reduce the funds’ investment returns and are borne proportionately by all fund shareholders, including clients of Drucker Wealth, LLC. These mutual fund fees, or “expense ratios,” are described in the funds’ prospectuses, and are separate from and in addition to the fees charged by Drucker Wealth, LLC. Client assets are also held in brokerage accounts which are subject to certain custodial fees; such as, checks returned or debit declines for insufficient funds as well as a full transfer out fee and potential third-party service provider costs. These fees and expenses are further described in the brokerage agreement.

### **Order Management System**

Fees are generally directly debited on a pro rata basis from client accounts. The exception for this is directly-managed held-away accounts, such as 401(k)’s. Those fees will be assigned to the client’s taxable accounts on a pro-rata basis. If the client does not have a taxable account, those fees will be billed directly to the client. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period.

### **Payment of Fees and Termination**

Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client’s investment advisory agreement with the Advisor is non-transferable without the Client’s prior consent.

### **Compensation for Selling Securities and Insurance Products**

Drucker Wealth, LLC does not buy or sell securities for commission compensation. However, investment advisor representatives, in their individual capacity as registered representatives of Purshe Kaplan Sterling Investments<sup>7</sup> (“PKS”), can receive commission compensation for selling securities.

Commission rates differ from product to product and carrier to carrier. In addition to commissions, investment advisor representatives can receive marketing support, reasonable meals and entertainment, and reimbursement of the cost to attend training, conferences, and events hosted by insurance companies and third-party marketing organizations contracted with and receive compensation from the insurance company. Insurance commissions and other benefits are significant sources of compensation and are paid separately from

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<sup>7</sup> Purshe Kaplan Sterling Investments (“PKS”) is a full-service broker/dealer and financial services firm headquartered in Albany, New York. The Firm traces its roots to 1993 when it began as a regional brokerage firm. PKS has grown substantially over the past decade and now has over 600 offices and more than 1,600 Registered Representatives operating in a classic open architecture environment. PKS is registered with the U.S. Securities and Exchange Commission and is a member of FINRA and the Municipal Securities Rulemaking Board. PKS clears its trades through National Financial Services LLC, offering state-of-the-art products and technology to our Registered Representatives. In addition, PKS provides access to every major Investment Company, hundreds of Variable Annuity products and access to some of the top professional money managers in the country. PKS is committed to providing its Registered Representatives with the freedom to offer clients a full spectrum of investment choices. PKS does not own investment products. The absence of proprietary products coupled with unrestricted access to investment products provides our Registered Representatives with the flexibility to help you achieve your investment objectives.

advisory fees on assets in a client's managed securities account. Commissions are generally paid up-front, at the time of sale, unlike asset-based fees which are paid periodically over the course of the relationship. The amount and form of insurance compensation creates a conflict of interest in that investment advisor representatives in their individual capacity as insurance agents are incentivized to recommend insurance products based on the compensation received rather than on a client's needs.

Investment advisor representatives in their individual capacity as insurance agents are not required to offer the products of a specific insurance company. The compensation received from selling securities or insurance is separate from and does not offset regular advisory fees. Although, Drucker Wealth, LLC will not charge advisory fees on any insurance products. Clients are under no obligation to implement any recommendations and have the option to implement such recommendations through a different registered representative or insurance agent.

Drucker Wealth, LLC addresses the conflict of interest related to selling securities and/or insurance products by requiring its investment advisor representatives to always act in the best interest of the client.

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

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Drucker Wealth, LLC does not charge performance-based fees for its investment advisory services - fees based on a share of capital gains or capital appreciation of assets.

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#### **Item 7 – Types of Clients**

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The types of clients served by Drucker Wealth, LLC are generally pre-retirement individuals and high-net-worth individuals who are mid-career professionals in the technology or medical industry or small business owners.

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

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Drucker Wealth, LLC primarily employs fundamental and technical analysis in developing investment strategies for its clients. Research and analysis from Drucker Wealth, LLC are derived from numerous sources, including unaffiliated third-party registered investment advisors, financial media companies, third-party research materials, Internet sources, and reviews of company activities, including annual reports, prospectuses, press releases, and research or market signals prepared by others.

##### **Fundamental Analysis**

Drucker Wealth, LLC attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Drucker Wealth, LLC looks at historical and present financial statements of the company, annual reports, governmental filings and business activities. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Individualized analysis of underlying documentation can vary.

##### **Technical Method of Investing**

The technical method of investing, also known as technical analysis, is an investment strategy that focuses on analyzing historical price patterns, market trends, and trading volume data of an asset to make investment decisions. It is primarily concerned with studying charts and using various technical indicators to identify potential buying or selling opportunities. Unlike fundamental analysis, which assesses the intrinsic value of an asset, technical analysis aims to predict future price movements based on historical patterns and market behavior.

##### **Tactical Method of Investing**

The tactical method of investing refers to an investment strategy that involves actively adjusting a portfolio's asset allocation based on short-term market conditions, economic trends, or other factors. Unlike a passive strategy that follows a long-term buy-and-hold approach, tactical investing aims to capitalize on short-term opportunities and mitigate risks by making strategic allocation shifts.

## **Behavioral**

Behavioral investing, often referenced within the broader realm of behavioral finance, examines how psychological and emotional factors influence the investment decisions of individuals and institutions. It challenges the traditional finance paradigm, which assumes that investors are always rational and markets are always efficient. Instead, behavioral investing posits that investors are often irrational due to cognitive biases that can lead to systematic errors in decision making.

**Cognitive Biases:** These are systematic patterns of deviation from norm or rationality in judgment. Some common biases in investing include: overestimating one's knowledge or abilities, focusing on and valuing information that confirms one's pre-existing beliefs, while ignoring contradictory evidence.

**Recency Bias:** Overemphasizing recent events or trends and extrapolating them into the future. For example, assuming that a stock that has recently risen will continue to do so.

**Loss Aversion:** Feeling the pain of losses more acutely than the pleasure of gains. This can lead to holding onto losing investments too long or selling winning investments too soon.

**Anchoring:** Relying heavily on an initial piece of information (the "anchor") when making subsequent judgments. For instance, becoming anchored to the price at which one bought a stock and basing future decisions on it.

**Emotional Factors:** Emotions play a significant role in investment decisions. Fear and greed are two major emotional drivers: that can cause investors to avoid necessary risks or sell assets hastily during market downturns.

## **Asset Allocation**

Asset allocation is a key concept in investment management and refers to dividing investments among different asset classes. The primary goal of asset allocation is to create a balanced portfolio that aligns with investment goals, risk tolerance, and time horizon.

**Risk and Return Balance:** Different asset classes (like stocks, bonds, and real estate) have varying levels of risk and expected returns. By diversifying investments across multiple asset classes, you can potentially achieve a desired return while managing risk.

**Diversification Benefits:** No single asset class consistently outperforms the others. Allocating resources across different assets can reduce the impact of any one asset's poor performance on the overall portfolio.

**Investment Goals:** Asset allocation helps align your portfolio with your investment goals.

**Risk Tolerance:** This is a measure of your willingness and ability to withstand fluctuations in the value of your investments. If you're risk-averse, you might lean more towards bonds and cash; if you're risk-tolerant, you might have a higher allocation to stocks.

**Time Horizon:** The length of time you expect to keep your money invested. Longer horizons may allow for more aggressive allocations since there's more time to recover from potential downturns.

**Financial Goals:** Whether you're saving for retirement, a home, or education can influence your allocation.

**Current Financial Situation:** Existing financial resources, debts, and other obligations can also influence decisions.

**Rebalancing:** Over time, due to the varying returns of asset classes, a portfolio can drift from its target allocation. Rebalancing involves adjusting the portfolio back to the desired allocation. This might mean selling some assets that have performed well and buying more of those that have underperformed.

**Strategic Asset Allocation:** This involves setting and maintaining a long-term asset mix based on expected returns and risk for each asset class.

**Tactical Asset Allocation:** Allows for short-term deviations from the strategic allocation to exploit market anomalies or opportunities.

## **Investment Diversity**

Investment diversity, more commonly referred to as "investment diversification," is a risk management strategy that mixes a wide variety of investments within a portfolio. The rationale behind this approach is that a portfolio constructed of diverse investments will, on average, yield higher returns and pose a lower risk than any individual investment found within the portfolio.

**Risk Reduction:** Diversification spreads investments across various assets or asset classes. This spread can reduce the negative impact any single investment's poor performance might have on the overall portfolio.

**Potential for Higher Returns:** With investments spread across different areas, there's a possibility that at least one of them might perform exceptionally well, thus boosting the portfolio's overall returns.

**Asset Class Diversification:** This involves spreading investments across different types of assets like stocks, bonds, real estate, commodities, etc. Each asset class reacts differently to market events, providing a balancing effect.

**Geographical/Regional Diversification:** Investing in assets from different countries or regions. This minimizes risks associated with downturns in any particular country or region's economy.

**Sectoral Diversification:** Investing across different industries or sectors, such as technology, healthcare, finance, etc. This ensures that a downturn in one sector doesn't drag down the entire portfolio.

**Diversification by Strategy:** Implementing multiple investment strategies, such as growth, value, income, etc.

**Time Diversification:** Spreading out investments over various time horizons, often achieved through techniques like dollar-cost averaging.

## **Risk of Loss**

Investing in securities involves risk. Securities tend to fluctuate in value and can lose value. Clients should be prepared to bear the potential risk of loss. Drucker Wealth, LLC will assist Clients in determining an appropriate strategy based on their investment objective and tolerance for risk. However, there is no guarantee that a Client will meet their investment goals or assets will increase in value. Drucker Wealth will rely on 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 advise of any changes in financial condition, goals or other factors.

The following are some of the general risks associated with investing that Clients should understand, consider and determine the amount of risk they are able to accept prior to opening an account:

**Business Risk:** The measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.

**Call Risk:** The risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.

**Credit Risk:** The risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.

**Currency/Exchange Rate Risk:** The risk of a change in the price of one currency against another.

**ETF Risks, including Net Asset Valuations and Tracking Error:** ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or

for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. An ETF typically includes embedded expenses and related fees that reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Program Account's performance or an index benchmark comparison. Expenses of an ETF generally include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses can change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses can vary.

**Extraordinary Events:** Terrorism and the United States' involvement in armed conflict may negatively affect general economic fortunes, including sales, profits, and production. An unstable geopolitical climate and continued threats of terrorism and war could have a material effect on general economic conditions, market conditions, and market liquidity (i.e., depressed securities prices and problems with trading facilities and infrastructure). Additionally, a serious pandemic or natural disaster could severely disrupt the global, national, and/or regional economies. A resulting negative impact on economic fundamentals and consumer confidence may increase the risk of default of particular companies and negatively impact our clients.

**Inflationary Risk:** The risk that future inflation will cause the purchasing power of cash flow from an investment to decline.

**Interest Rate Risk:** The risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates.

**Legislative Risk:** The risk of a legislative ruling resulting in adverse consequences.

**Liquidity Risk:** The possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.

**Market Risk:** The risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.

**Mutual Fund Risks:** A risk exists that the investment strategies employed by the mutual funds will not meet the stated investment objectives the fund is seeking to obtain. Mutual funds may invest in equities, fixed income, derivatives, and other asset classes; the risks associated with such investments are described in the fund's prospectus. The performance of a mutual fund may not exactly match the performance of the index or market benchmark that the fund is designed to track due to the mutual fund incurring expenses and transaction costs not incurred by any applicable index or market benchmark. Expenses can change from time to time at the sole discretion of the issuer and expenses can vary.

**Pandemic Risk:** Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

#### **Reinvestment Risk**

The risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.

#### **Social/Political**

The possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.

#### **Taxability Risk**

The risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.

### **Types of Investments**

There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results. The types of investments typically used by Drucker Wealth, LLC include:

**Mutual Funds:** A pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets. An open-end mutual fund is a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature. A closed-end mutual fund is a type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed, and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds. Alternative strategy mutual funds primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes, and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.

**Equity:** Investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.

**Exchange Traded Funds (ETFs):** An ETF is a portfolio of securities invested to track a market index similar to an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result, investors pay more or less when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or investment companies that provide market liquidity. When there is a shortage of shares in the market, the authorized participant creates more (creation). Conversely, the authorized participant will reduce shares in circulation (redemption) when supply falls short of demand. Multiple authorized participants help improve the liquidity of a particular ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange. The performance of ETFs is subject to market risk, including the complete loss of principal. ETFs also have a trading risk based on cost inefficiency if the ETFs are actively traded and a liquidity risk if the ETFs has a large price spread and low trading volume. In addition, investors buying or selling shares in the secondary market pay brokerage commissions, which may be a significant proportional cost not incurred by mutual funds.

**Cash and Cash Equivalents:** Cash is money in the form of currency, which includes all bills, coins, and currency notes. Cash and cash equivalents refers to the line item on the balance sheet that reports the value of a company's assets that are cash or can be converted into cash immediately. Cash equivalents include bank accounts and marketable securities, which are debt securities with maturities of less than 90 days. Examples of cash equivalents include commercial paper, Treasury bills, and short-term government bonds with a maturity date of three months or less. Marketable securities and money market holdings are considered cash equivalents because they are liquid and not subject to material fluctuations in value.

Additional types of investments will be considered for asset allocation and risk management purposes.

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## Item 9 – Disciplinary Information

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Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm’s management. Drucker Wealth, LLC has no information to disclose.



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

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### **Broker-Dealer Affiliation**

Certain Investment Advisor Representatives of Drucker Wealth, LLC are Registered Representatives of Purshe Kaplan Sterling Investments (PKS), member FINRA/SIPC, and licensed insurance agents. As a result of these transactions, they receive commissions. A conflict of interest exists as these commissionable sales create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, our firm will act in the client's best interest.

The individuals that are licensed as registered representatives are subject to regulations that restrict them from conducting securities transactions away from PKS through other broker/dealers.

### **Insurance Agency Affiliations**

Certain Investment Advisor Representatives are also a licensed insurance professional (agent). Insurance Agents earn commission compensation for selling insurance products. Commissions generated by insurance sales do not offset regular advisory fees. This represents a conflict of interest. Clients are under no obligation to implement any recommendations made.

### **Insurance Products Compensation**

Certain Investment Advisor Representatives of Drucker Wealth, LLC are licensed as insurance agents, receive commissions and other compensation from insurance companies and insurance intermediaries for the sale of insurance products. Commission rates differ from product to product and carrier to carrier. In addition to commissions, its representatives can also receive marketing support, reasonable meals and entertainment, and costs to attend training, conferences, and events hosted by insurance companies and third-party marketing organizations that are contracted with and receive compensation from the insurance company. Insurance commissions and other benefits are significant sources of compensation and are paid separately from advisory fees on assets in a client's managed securities account. Commissions are generally paid up-front, at the time of sale, unlike asset-based fees which are paid periodically over the course of the relationship. This amount and form of insurance compensation creates a conflict of interest in that investment advisor representatives in their individual capacity as insurance agents are incentivized to recommend insurance products based on the compensation received rather than on a client's needs.

Investment Advisor Representatives in their individual capacity of insurance agents are not required to offer the products of a specific insurance company. Any compensation received is separate from, and does not offset regular advisory fees. Drucker Wealth, LLC will not charge advisory fees on any insurance products. Clients are under no obligation to implement any recommendations, and have the option to implement such recommendations through brokers or agents unaffiliated with Cutter.

Drucker Wealth addresses the conflict of interest related to insurance products sales by requiring its investment advisor representatives to act in the best interest of the client, including when acting as insurance agents. Insurance-licensed investment advisor representatives employ a process of analyzing each customer's financial situation, needs, goals and risk profile for the purpose of making recommendations that are based on an objective evaluation of each client's best interest rather than on the receipt of any commissions or other benefits.

### **Conflicts of Interest**

Conflicts of interests exist because securities and insurance sales create an incentive to recommend products based on the compensation earned rather than the best interests of the Client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer. This chart is intended to explain the potential capacity a Financial Advisor can serve, and the type of compensation received.

<b>Capacity</b>	<b>Compensation</b>
Investment Advisor Representatives	Advisory Fee
Registered Representative	Commissions
Insurance Agent	Commissions

### **Additional Registrations**

Neither Drucker Wealth, LLC nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

There are no other relationships or arrangement material to the advisory business of Drucker Wealth, LLC that require disclosure.

Drucker Wealth, LLC can recommend and select other investment advisers and receive compensation directly or indirectly from those advisers that create a material conflict of interest, which is mitigated by the fiduciary duty to only act in a client's best interest.

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

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### **Code of Ethics**

Drucker Wealth, LLC has implemented a Code of Ethics (the “Code”) pursuant to SEC rule 204A-1. A copy of our code of ethics will be provided to any client or prospective client upon request. This Code applies to all persons associated with Drucker Wealth, LLC (“Covered Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. Drucker Wealth, LLC and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Drucker Wealth, LLC’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 (212) 681-0460.

### **Personal Trading with Material Interest**

Certain covered persons are considered “access” persons. An access person is a covered person who has access to nonpublic information regarding the purchase or the sale of securities, is involved in making securities recommendations to clients or who has access to such recommendations that are nonpublic. Drucker Wealth allows Access Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Access persons must notify the Compliance Department of, and receive prior approval for, opening accounts or holding personal securities and/or holdings. Access persons are required to provide duplicate statements for review. Drucker Wealth, LLC does not act as principal in any transaction, act as the general partner of a fund, or advise an investment company, have a material interest in any securities traded in Client accounts.

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

Drucker Wealth, LLC 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 non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Access Persons have a conflict of interest if trading in the same securities but their fiduciary duty to act in the best interest of its Clients mitigates this conflict. This risk is further mitigated by requiring reporting of personal securities trades by its Access Persons for review by the Chief Compliance Officer (“CCO”) or delegate.

### **Personal Trading at the Same Time as Client**

While Drucker Wealth, LLC 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 Drucker Wealth, or any Supervised Person of Drucker Wealth, LLC, transact in any security to the detriment of any Client.

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## **Item 12 – Brokerage Practices**

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### **Broker/Dealer Recommendation**

#### **National Financial Services LLC, and Fidelity Brokerage Services LLC**

Drucker Wealth, LLC will generally not allow advisory clients to determine the broker/dealer to use. Rather, Drucker Wealth, LLC will generally require that clients establish brokerage accounts with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, “Fidelity”) or Altruist Financial, LLC. Fidelity provides the Company with Fidelity’s “platform” services. The platform services include, among others, brokerage, custodial, trade execution, clearance, settlement of transactions, administrative support, record keeping and related services that are intended to support intermediaries like the Company in conducting business and in serving the best interests of their clients but that may benefit the Company.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables the Company to obtain many no-load mutual funds without transaction charges 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. Some of these transaction fees are covered by the Company under its wrap program.

As part of the arrangement, Fidelity may also make available to the Company, at no additional charge, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by the Company (within specified parameters). These research and brokerage services would be used by the Company to manage accounts for which it has investment discretion. Services provided by Fidelity may include research (including mutual fund research, third-party research, and Fidelity's proprietary research), brokerage, clearing, custody, and access to mutual funds and other investments that are available only to institutional investors or would require a significantly higher minimum initial investment.

Research and brokerage services presently include access to a full array of proprietary and third-party investment offerings, spanning alternatives, structured products, separately managed accounts and mutual funds; comprehensive technology integration, training and support; Integrated Trust Services offering efficient, custody and clearing; business-building solutions ranging from marketing support to client management tools; integrated charitable and foundation services through Fidelity Charitable Services; and leading retirement programs and offerings to help the Company meet both the asset accumulation and income distribution needs of its clients. The Company may also receive additional services from Fidelity. Without this arrangement, the Company might be compelled to purchase the same or similar services at its own expense.

Drucker Wealth, LLC may be eligible for a specific schedule of fees based upon our assets under management with Fidelity. A client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where Drucker Wealth, LLC determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Drucker Wealth, LLC will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by Drucker Wealth, LLC will generally be used to service all of its clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Drucker Wealth, LLC and Fidelity are not affiliates.

#### **Altruist Financial, LLC**

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options, and complete integration with software tools, Drucker Wealth, LLC can also recommend Altruist Financial LLC.

#### **Soft Dollars**

Drucker Wealth does not receive research or other products or services other than execution from a broker/dealer or a third party in connection with client securities transactions that would be considered soft dollar benefits.

#### **Brokerage Referrals**

Drucker Wealth does not receive any compensation from a third-party in connection with the recommendation for establishing an account. By directing brokerage you may be unable to achieve the most favorable execution of client transactions, this practice may cost clients more money.

#### **Directed Brokerage**

All Clients trades a directed to a broker/dealer determined by Drucker Wealth, LLC. Clients do not have the ability to direct trades to a different broker/dealer. Drucker Wealth does not have any broker/dealer affiliates or other economic relationships that create a material conflict of interest.

### **Aggregating and Allocating Trades**

Drucker Wealth, LLC does not aggregate orders when securities are purchased or sold through the Custodian for multiple accounts on the same trading day.

### **Best Execution**

Drucker Wealth, LLC recognizes that the analysis of execution quality involves a number of qualitative and quantitative factors. Consequently, Drucker Wealth, LLC will follow a process in an attempt to ensure that it is seeking to obtain the most favorable execution under the prevailing circumstances when placing client orders. These factors include, but are not limited, to the following:

- The financial strength, reputation and stability of the broker-dealer;
- The efficiency with which the transaction is effected; the ability to effect prompt and reliable executions at favorable prices (including the applicable dealer spread or commission, if any);
- The availability of the broker-dealer to stand ready to effect transactions of varying degrees of difficulty in the future;
- The efficiency of error resolution, clearance and settlement;
- Block trading and positioning capabilities;
- Performance measurements;
- Online access to computerized data regarding customer accounts;
- Availability, comprehensiveness, and frequency of brokerage and research services;
- Commission rate;
- The economic benefit to the clients; and
- Related matters involved in the receipt of brokerage services.

### **Trade Errors**

Drucker Wealth, LLC has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Drucker Wealth, LLC to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Drucker Wealth, LLC if the error is caused by Drucker Wealth, LLC. If the error is caused by the broker/dealer, the broker/dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. Drucker Wealth, LLC may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons). Drucker Wealth, LLC will never benefit or profit from trade errors.

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## **Item 13 – Review of Accounts**

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### **Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Drucker Wealth, LLC Chief Compliance Officer of Drucker Wealth, LLC. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **Causes for Reviews**

Client accounts are reviewed at least annually and more frequently at a Client's request. Accounts are reviewed as a result of major changes in economic conditions, changes in financial situation, and/or based on large deposits or withdrawals. Clients are encouraged to notify Drucker Wealth, LLC of such changes. Additional reviews can be triggered by material market, economic or political events.

## **Review Reports**

Clients receive written statements no less than quarterly directly from the Custodian. The Client may establish electronic access to the Custodian's website so that they can view these reports and their account activity. Client statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports during regular meetings regarding their holdings, allocations, and performance that do not constitute official statements.

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

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Drucker Wealth, LLC is a fee-based advisory firm, that is compensated by its Clients to provide investment advice and not from any investment product or someone other than the Client. Advisor does not receive commissions or other economic benefit or compensation from product sponsors, broker/dealers or any un-related third party.

### **Client Referrals from Solicitors**

Drucker Wealth, LLC receives client referrals from a paid solicitor, also known as a promoter.

### **Money Managers and Product Sponsors**

Investment advisor representatives will, on occasion, have an opportunity to attend a training event or participate in a due diligence visit where the Money Manager or Product Sponsor will cover the associated travel expenses such as airfare, hotel and meals. Training opportunities are often held at luxury resorts where amenities such as golf, spas and entertainment are provided. Such accommodations represent a conflict of interest that can influence the evaluation of the Money Manager or Product sponsor based on factors other than the quality of services.

### **Additional Compensation**

Drucker Wealth, LLC can receive an economic benefit for providing advisory services from sources other than the client. Economic benefits include sales awards and gifts, an occasional meal, as well as entertainment such as a concert, show or sporting event. Such compensation is not directly related to the advice or services provided to a particular client, but it does create a conflict of interest that can influence the selection of services based on the compensation received.

### **Industry Professionals**

When it is in the best interests of the client, Drucker Wealth, LLC can introduce the services of other professionals for certain non-investment purposes (i.e. attorneys or accountants). Introductions represent a conflict of interest because they create a relationship where the other professional has an implied obligation to introduce potential new clients to Drucker Wealth. Clients are under no obligation to engage the services of any such professional. If the client engages any such professional, and a dispute arises, any recourse will be exclusively from and against the engaged professional.

Conflicts of interest are mitigated by the fiduciary duty to always act in a client's best interest and acting accordingly. Drucker Wealth will seek independent counsel to evaluate conflicts as they arise and provide sufficient disclosure and controls which may include declining to participate or proceed with an engagement.

## **Fidelity Brokerage and Custody Services**

As disclosed in item 12 (Brokerage Practices) above, Drucker Wealth, LLC participates in Fidelity's institutional advisor program, and will recommend Fidelity to clients for custody and brokerage services. There is no direct link between the Company's participation in the program and the investment advice it gives to its clients, although the Company receives economic benefits through its participation in the program that are typically not available to Fidelity retail investors.

Fidelity can make available to Drucker Wealth, LLC other products and services that benefit us, but that may not directly benefit our clients' accounts, such as,

- Provide access to client account data (such as trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide research, pricing and other market data;

- Facilitate payment of our fees from clients' accounts; and assist with back-office functions, recordkeeping and client reporting;
- Receipt of duplicate client statements and confirmations; and
- The ability to have advisory fees deducted directly from our client's accounts.

Other services can be offered to help Drucker Wealth, LLC manage and further develop the business enterprise.

### **Altruist**

Drucker Wealth, LLC can also recommend Altruist Financial for custody and brokerage services. There is no direct link between participation in the program and the investment advice given to Clients, although Drucker Wealth, LLC can receive economic benefits through its participation in programs typically not available to Altruist Financial retail investors.

The benefits received by Drucker Wealth, LLC do not depend on the amount of transactions directed to Altruist Financial. The receipt of such services creates a conflict of interest that is mitigated by a fiduciary duty to always act in a Client's best interest.

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### **Item 15 – Custody**

Drucker Wealth, LLC does not accept or maintain actual custody of funds or securities. A qualified custodian is responsible to provide Clients with trade confirmations, tax forms and quarterly statements that include account balance(s). Clients are advised to carefully review the information provided by the custodian and notify their Investment Advisor Representative with any questions or if such information is not received.

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### **Item 16 – Investment Discretion**

Drucker Wealth, LLC provides investment advisory services on a discretionary basis. Prior to assuming discretionary authority, the Client grants permission by executing an Advisory Agreement, granting Drucker Wealth full authority to buy and/or sell the type and amount of securities.

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

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

Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent or from you, and discuss whether (and, if so, how) clients can contact you with questions about a particular solicitation.

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### **Item 18 – Financial Information**

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



Registered As: Drucker Wealth, LLC | CRD No. 328909

# Appendix 1 – Wrap Fee Program Brochure

110 Winding Way | Woodcliff Lake, New Jersey 07677

Phone: (212) 681-0460 Fax: (419) 735-0158

Website: <https://druckerwealth.com/>

February 08, 2024

This wrap fee program brochure provides information about the qualification and business practices of Advisor . If you have any questions about the contents of this brochure, please contact us at Phone: (212) 681-0460 Fax: (419) 735-0158. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information Advisor is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

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### Material Changes

Drucker Wealth, LLC is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure. Annually, a complete Disclosure Brochure will be offered to Clients along with a summary of material changes, if any, within 120 days from the firm's fiscal year-end.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the firm name or CRD number 328909. A copy of this Disclosure Brochure may be requested at any time, by contacting (212) 681-0460.

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

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### **Services**

Drucker Wealth, LLC can provide portfolio management services as a Wrap Fee Program, where the asset management fee and brokerage transaction fees (ticket charges) are combined or “wrapped” into a single fee. For such accounts, Advisor is considered the Sponsor and Portfolio Manager. This brochure is provided as an appendix to Form ADV 2A to describe fee structure of a wrap fee program.

Other than the fee structure, the services offered in a wrap fee and a non-wrap fee account are identical. In either account type the total fees are negotiable and paid to Advisor. A wrap fee program will generally have a higher asset management fee to account for the additional cost of ticket charges paid by Advisor.

### **Program Costs**

The fee structure that is in the client’s best interest depends on the type of positions held, anticipated frequency of trading and fee payment preference. For example, a portfolio of primarily No Transaction Fee (NTFs) positions or an account with a low volume of trading will generally not benefit from the higher asset management fee of a wrap fee account. Whereas an account that has positions that include a ticket charge per transaction and there is an anticipated high degree of trading would likely benefit from a wrap fee program.

A Wrap Fee program introduces a conflict of interest because it creates an incentive to limit the number of trades placed in the Client’s account to reduce the ticket charges to the Advisor.

### **Fees**

Investment advisory fees, not to exceed 1.0%, are paid quarterly in advance pursuant to the terms of the investment advisory agreement. The applicable fee is based on several factors, including, the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Drucker Wealth, LLC. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Clients will incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client’s account[s]. In addition, all fees paid to Drucker Wealth, LLC for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds 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.

The Client can also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, fees for trades executed away from the Custodian and other fees. Drucker Wealth, LLC does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by Drucker Wealth, LLC to fully understand the total fees to be paid.

### **Compensation**

Drucker Wealth, LLC receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client’s account(s).

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

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There are no other types of clients to disclose other than those listed in Item 7 of the preceding ADV 2A.

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

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### **Portfolio Manager Selection**

Drucker Wealth, LLC serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

### **Performance-Based Fees**

Drucker Wealth, LLC does not charge performance-based fees.

### **Proxy Voting**

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

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### **Item 7 – Client Information Provided to Portfolio Managers**

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Drucker Wealth, LLC is the sponsor and sole portfolio manager for the Program. Drucker Wealth, LLC does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program.

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

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Drucker Wealth, LLC is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Drucker Wealth, LLC.

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### **Item 9 – Additional Information**

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#### **Disciplinary Information**

There is no information to disclose.

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

Item 10 of the ADV 2A provides complete information about Other Financial Industry Activities and Affiliations. There is no additional information to disclose regarding a wrap fee program.

#### **Code of Ethics**

Item 11 of the ADV 2A provides complete information regarding the Code of Ethics. There is no additional information to disclose regarding a wrap fee program.

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

Item 14 of the ADV 2A provides complete information regarding the client referrals and other compensation. There is no additional information to disclose regarding a wrap fee program.

#### **Financial Information**

Item 18 of the ADV 2A provides complete information regarding financial information. There is no additional information to disclose regarding a wrap fee program.

## Privacy Policy

### Our Commitment to You

Drucker Wealth, LLC (“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. Drucker Wealth, LLC (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. Drucker Wealth, LLC does not sell your non-public 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 non-public information is collected and used are set forth in this Policy.

### Why 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 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 over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

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



## How do we share your information?

An RIA shares Client 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 non-public personal information with affiliated and non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, 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> - Drucker Wealth, LLC 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 Drucker Wealth, LLC or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
<b>Authorized Users</b> - Your non-public 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> - Drucker Wealth, LLC 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.	No	Not Shared

## Other Important State Specific Information

In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.

## 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 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.

## 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 (212) 681-0460.