

Stark Wealth Management LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Stark Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (610) 704-3535 or by email at: pbarry@starkfinancialgroup.com. 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 Stark Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Stark Wealth Management LLC's CRD number is: 309422.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

There are the following material changes in this brochure from the last annual updating amendment of Stark Wealth Management LLC on March 25, 2024. Material changes relate to Stark Wealth Management LLC's policies, practices or conflicts of interests.

Paul David Richard Barry is no longer a registered representative of PKS. (Item 10)

The firm has updated its fee schedule. (Item 5)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Stark Wealth Management LLC (hereinafter “SWM”) is a Limited Liability Company organized in the State of Pennsylvania. The firm was formed in March 2020, and the principal owners are Mark Sessanta and Paul Barry.

B. Types of Advisory Services

Portfolio Management Services

SWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SWM creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

SWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Selection of Other Advisers Services

SWM may offer investment advisory services through use of third-party money managers (“Outside Managers” and “Sub-Advisers”) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. We will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Before selecting other advisers for clients, SWM will always ensure those other advisers are properly licensed or registered as an investment adviser. SWM conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. SWM then makes investments with a third-party investment adviser by referring the client to the third-party adviser. SWM will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Specifically, SWM will direct clients to SEI Private Trust Company and its affiliates (collectively, "SEI"), which include the investment advisory firm SEI Investments Management Corporation [CRD#105146] ("SIMC") and the broker-dealer SEI Investments Distribution Co. [CRD#10690]. SEI has developed a standard managed account solutions ("MAS"), which program includes SEI's distribution focused strategies, an integrated managed account solutions providing a tax overlay service ("Tax Management") and a Goals Based Investing managed account solutions, consisting of MAS and Tax Management portfolios invested in accordance with SEI's goals-based investment solutions and, may, in the future, develop additional managed account solutions (collectively, the "Managed Account Solutions").

Under this program, SIMC acts a co-investment advisor to the client, along with the SWM, pursuant to a tri-party investment management agreement executed among SIMC, the SWM and each client investing assets into the Managed Account Solutions (the "Tri-party Agreement").

For each Managed Account Solutions, SIMC is responsible for developing managed account portfolios designed to be invested in accordance with a stated investment objective (the "Managed Account Portfolios"). For each Managed Account Portfolio, other than the Managed Account Portfolios implementing distribution-focused strategies (the "DFS Portfolios"), SIMC is solely responsible for screening, reviewing and selecting the various money managers and/or individual mutual funds and other assets available for selection by SWM and their clients designed to meet the specific Managed Account Portfolio's stated investment objective or goal.

For each DFS Portfolio, SIMC is responsible for selecting the SEI funds and/or other assets underlying each DFS Portfolio and actively managing each client's account invested in a DFS Portfolio in accordance with the portfolio's investment objectives.

Pursuant to the Managed Account Solutions, SIMC will provide to SWM, and its investment adviser representatives of SWM the following services:

- Make available to SWM and its investment adviser representatives of SWM Managed Account Portfolios developed solely by SIMC and designed to achieve specific investment objectives or goals, and, pursuant to which the clients, with recommendations from investment adviser representatives of SWM, will select from a list of available money managers (which may include SIMC), SEI mutual funds, and/or other assets and, in the case of DFS Managed Account Portfolios, investment strategies managed solely by SIMC, and which SIMC has determined: (i) as to available money managers, will invest in accordance with the Managed Account Portfolio's stated investment objective or goal; and (ii) as to available individual mutual funds and other assets, are intended to help achieve the specific Managed Account Portfolio's stated investment objectives or goals.
- In its sole discretion, rebalance the model asset allocation mix of the Managed Account Portfolios (including adding, removing or otherwise changing money managers available to manage assets within a portfolio, or the mutual funds or other assets available), as necessary to remain consistent with the model Managed Account

Portfolio's investment objectives and otherwise be fully responsible for determining that the Managed Account Portfolios remain invested consistent with their stated investment objective or goal and will notify SWM of any money manager change.

- Through a proprietary web-based portfolio modeling system, recommend to SWM one or more Managed Account Portfolios that may meet a client's investment objective(s), based solely on that client's financial and other information provided to SEI by SWM.
- In its role as co-advisor to clients in the Managed Account Solutions, manage each Managed Account Portfolio, including, without limitation, (i) monitoring the performance of each selected money manager, in accordance with the portfolio's stated investment objective or goal and in accordance with the terms of the Tri-party Agreement and (ii) for client accounts invested in DFS Portfolios, be solely responsible for selecting, managing and rebalancing the SEI funds or other assets included in the client accounts necessary for such accounts to be and remain invested in accordance with the applicable DFS Portfolio's investment objective, as selected by clients with the assistance of investment adviser representatives of SWM.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; education planning; and debt/credit planning.

Services Limited to Specific Types of Investments

SWM generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities, although SWM primarily recommends ETF strategies. SWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

SWM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by SWM on behalf of the client. SWM may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SWM from properly servicing the client account, or if the restrictions would require SWM to deviate from its standard suite of services, SWM reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. SWM does not participate in any wrap fee programs.

E. Assets Under Management

SWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 113541652	\$ 18180901	June 2024

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Services Fees

Total Assets	Annual Fee
\$0 - \$500,000	0.85%
\$500,001 - \$1,000,000	0.75%
\$1,000,001 - \$2,000,000	0.55%
\$2,000,001 - \$5,000,000	0.40%
\$5,000,001 - \$10,000,000	0.35%
\$10,000,001 and above	0.30%

Selection of Other Advisers Fees

SWM will receive its standard fee on top of the fee paid to the third-party adviser. This relationship will be memorialized in each contract between SWM and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency. Specifically, SWM may direct clients to SEI Private Trust Company, Charles Schwab and Capital Bank & Trust.

The annual fee schedule is as follows:

Total Assets Under Management	SWM's Fee	Third Party's Fee	Total Fee
All Assets	1.00%	1.00%	2.00%

SWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. The total client fees when using a third-party investment adviser will not exceed 2.00% of AUM. These fees are negotiable.

Prior to introducing Pennsylvania clients to another investment advisor, SWM will be responsible for determining the following:

- whether the investment advisor is registered with the Pennsylvania Department of Banking and Securities under Section 301 of the Pennsylvania Securities Act of 1972 ("1972 Act") whether the investment advisor is relying on an exclusion from the definition of investment advisor under Section 102(j) of the 1972 Act;
- whether the investment advisor is relying on an exemption from registration under Section 302(d) of the 1972 Act; or
- if the investment advisor is registered with the Securities and Exchange Commission, and whether it has filed a Notification Filing with the Pennsylvania Department of Banking and Securities under Commission Regulation 303.015(a).

When a copy of the Brochure Document(s) is not provided to the client at least 48 hours prior to signing the contract(s), client has five business days in which to cancel the contract, without penalty.

The annual fee schedule for Charles Schwab is as follows:

Total Assets Under Management	SWM's Fee	Third Party's Fee	Total Fee
Up to \$50,000,000	1.00%	1.00%	2.00%

The annual fee schedule for Capital Bank & Trust (American Funds) is as follows:

Total Assets Under Management	SWM's Fee	Third Party's Fee	Total Fee
Up to \$50,000,000	1.00%	0.75%	1.75%

SWM, in its discretion, may charge a lesser or higher investment advisory fee, charge a flat fee, waive applicable minimum asset or minimum fee levels, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be

managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. Furthermore, Grandfathered fee schedules may be higher or lower than SWM's investment advisory fee. Grandfathered fee schedules will not exceed 1.00%.

The annual fee schedule for Forefront Analytics, LLC is as follows:

Total Assets	SWM's Fee	Third Party's Fee	Total Fee
Up to \$50,000,000	1.00%	0.60	1.65%

Financial Planning Fees

SWM intends to provide financial planning and asset allocation advice for a fee. This is separate from charging an asset charge. We will primarily be designing financial plans for clients. Clients may custody assets outside of the purview of Stark Wealth Management, and only utilize our services for the design. The fees can be up to \$6000 per year depending on frequency of touch points. This fee is negotiable.

B. Payment of Fees

Payment of Portfolio Management Fees

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly in arrears.

Payment of Selection of Other Advisers Fees

Fees for selection of SEI Private Trust Company as third-party adviser are withdrawn directly from the client's accounts with client's written authorization by to SEI Private Trust Company. SEI Private Trust Company will then pay SWM the portion of the fee earned. Fees are paid monthly in arrears.

For fees deducted directly from client accounts, in states that require it, SWM will:

- (A) possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.

- (C) send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Fees for Charles Schwab, Capital Bank & Trust and Forefront Analytics, LLC are paid monthly and in arrears.

Payment of Financial Planning Fees

Financial Planning fees are Invoiced and payable via cash, check, or wire. Fees are paid quarterly in arrears. SWM considers cash to be an asset class, therefore chargeable assets under management includes cash balances in our fee calculation which may exceed present money market yields.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SWM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

SWM collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither SWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

SWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SWM generally provides advisory services to the following types of clients:

- ❖ Individuals

❖ High-Net-Worth Individuals

There is no account minimum for any of SWM's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SWM's methods of analysis include Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

SWM recommends long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: SWM's selection process cannot ensure that money managers will perform as desired and SWM will have no control over the day-to-day operations of any of its selected money managers. SWM would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: 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.

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 environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with

that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Reallocation Risk SIMC constructs and maintains global asset allocation strategies for certain Clients, and the SEI funds are designed in part to implement those Strategies. Within the Strategies, SIMC periodically adjusts the target allocations among the mutual funds to ensure that the appropriate mix of assets is in place. SIMC also may create new Strategies that reflect significant changes in allocation among the mutual funds. Because a large portion of the assets in the mutual funds may be composed of investors in Strategies controlled or influenced by SIMC, this reallocation activity could result in significant purchase or redemption activity in the mutual funds. While reallocations are intended to benefit investors that invest in the mutual funds through the Strategies, they could in certain cases have a detrimental effect on mutual funds that are being materially reallocated, including by increasing portfolio turnover (and related transactions costs), disrupting portfolio management strategy, and causing a mutual fund to incur taxable gains. SIMC seeks to manage the impact to the mutual funds resulting from reallocations in the Strategies.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

In November 2013 arbitration was initiated against Park Avenue Securities and Mark Sessanta based on allegations that FINRA Rules 2010 and 3270; NASD Rules 2110, 3030 and 3040: Sessanta participated in private securities transactions without providing prior written notice to his member firm. Specifically he referred firm customers to limited liability companies and the customers subsequently purchased interests totaling approximately \$317,000 being offered by these companies. Sessanta personally invested \$462,000 in the same limited liability companies. Sessanta completed annual compliance questionnaires for his firm wherein he acknowledged that he understood that he could not invest his own funds in a limited liability company and also that he could not facilitate a customer's investment in any business venture if doing so would constitute a private securities transaction. Sessanta sold equity-indexed annuities (EIAS) outside the scope of his employment with his firm and without providing his firm with any notice of the business activity. Sessanta's undisclosed EIA sales totaled about \$1,000,000. He received \$80,000 as compensation for the transactions. Sessanta completed annual compliance questionnaires for his firm wherein he acknowledged that he understood that he could not engage in any outside business activities without the prior written consent of the firm. The matter is no longer pending, as it was resulted in a civil and administrative penalty/fine of \$10,000 and a six month suspension that began 12/16/2013 and ended in 06/15/2014.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SWM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Paul David Richard Barry is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of SWM in connection with such individual's activities outside of SWM.

Mark Sessanta is CEO and Founder of Stark Financial Group. Paul David Richard Barry serves as Agent of Stark Financial Group. Both Mark and Paul are the principal owners of Stark Wealth Management. Stark Financial Group partners with Lifestyle Realty Group, a real estate firm, Stark Wealth Management LLC, this registered investment advisory firm, and Stark Financial Solutions, an entity that provides tax & accounting services. From time to time, SWM may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Stark Wealth Management LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Stark Wealth Management LLC in such individual's outside capacities.

Paul David Richard Barry serves as finance committee member for both Cornerstone Church, and Bethlehem Christian School. This time commitment equates to no more than 5 hours per month. This role involves council around investments, budgeting, and all other financial matters.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

SWM may direct clients to third-party investment advisers to manage all or a portion of the client's assets. SWM will receive its standard fee on top of the fee paid to the third party adviser. This relationship will be memorialized in each contract between SWM and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that SWM has an incentive to direct clients to the third-party investment advisers that provide SWM with a larger fee split. SWM will always act in the best interests of the client, including when determining which

third-party investment adviser to recommend to clients. SWM will ensure that all recommended advisers are licensed or notice filed in the states in which SWM is recommending them to clients.

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

A. Code of Ethics

SWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. SWM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SWM does not recommend that clients buy or sell any security in which a related person to SWM or SWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, SWM will never engage in trading

that operates to the client's disadvantage if representatives of SWM buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on SWM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and SWM may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in SWM's research efforts. SWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

SWM will require clients to use SEI Private Trust, Charles Schwab, and Capital Bank & Trust

1. Research and Other Soft-Dollar Benefits

While SWM has no formal soft dollars program in which soft dollars are used to pay for third party services, SWM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). SWM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and SWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. SWM benefits by not having to produce or pay for the research, products or services, and SWM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that SWM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

SWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

SWM will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

SWM does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for SWM's advisory services provided on an ongoing basis are reviewed at least Annually by Paul Barry, Financial Advisor, with regard to clients' respective investment policies and risk tolerance levels. All accounts at SWM are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of SWM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. SWM will also provide at least quarterly a separate written statement to the client.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SWM may receive compensation in connection with its use of third-party advisers.

SWM has access to a variety of economic benefits, services, and products in connection with SWM's use of SEI's investment adviser platform. The terms and availability of these benefits vary among advisors on the SEI platform (including SWM) depending on the business conducted with SEI and other factors. These services generally help SWM conduct its advisory business, but each specific benefit does not necessarily benefit each client.

Beyond access to SEI investment products, these include conferences, seminars and other educational and networking activities, business entertainment, reimbursement of travel and attendance expenses, research and other investment support services (such as client proposal and other financial planning support), technical and operational solutions (including the SEI Wealth Platform), marketing assistance (including joint marketing designed to promote SEI investment products), compliance services, human resources consulting, risk management/insurance assistance, front office, middle office, back office and other administrative support (including providing clerical staff to assist in the completion of required paperwork), SEI attendance at client meetings, information technology services, continuity and succession planning, access to financing and banking options, trust services, portfolio reporting, automatic rebalancing, tax loss harvesting, waiver or payment of certain fees (including paying account transfer fees or other charges that SWM or its clients would incur when changing service providers), vendor discounts, discount pricing on SEI services, and broader practice management consulting. These benefits may be provided via SEI, its affiliates, or third parties and may be made available to SWM at no fee, at a discounted fee, or via financial compensation provided by SEI. Some of these offerings depend on SWM conducting a minimum amount or type of current or expected future business with SEI, or having a minimum account size or amount of assets under management with SEI or invested in SEI investment products. Certain of these services or products, including those provided by or paid for by SEI, may be used by SWM in connection with its general business activities, in addition to supporting SWM's interaction with SEI systems. The benefits, services, products, or payments discussed herein may be significant to SWM and create an incentive for the SWM to utilize SEI services or investment products for its customers rather than other service providers or investment products. However, SWM strives at all times to put the interests of its clients first, including when selecting custodians or investment products for clients. SWM is independently owned and operated; it is not affiliated with SEI.

Charles Schwab & Co., Inc. Advisor Services provides SWM with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For SWM client accounts maintained in

its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to SWM other products and services that benefit SWM but may not benefit its clients' accounts. These benefits may include national, regional or SWM specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of SWM by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist SWM in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of SWM's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of SWM's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to SWM other services intended to help SWM manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to SWM by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to SWM. SWM is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non - Advisory Personnel for Client Referrals

SWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

SWM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy. SWM is deemed to have limited custody

solely because advisory fees are directly deducted from client's account by the custodian on behalf of SWM.

Certain clients may grant SWM standing authority via a SLOA to make disbursements to third parties from the client's account at a qualified custodian. Certain clients may grant SWM standing authority via a SLOA to make disbursements to third parties from the client's account at a qualified custodian. In such instances, SWM may be deemed to have custody of these client accounts in certain jurisdictions.

For any accounts with a SLOA in place, SWM will either (a) follow the custody rules for the relevant jurisdiction, including submitting to a surprise audit as applicable, or (b) follow the conditions set forth immediately below so that no surprise audit will be required for these accounts.

1. The client will be required to provide a written instruction to the qualified custodian that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client will authorize SWM in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian will perform appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and will provide a transfer of funds notice to the client promptly after each transfer.
4. The client will have the ability to terminate or change the instruction to the client's qualified custodian.
5. SWM will have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. SWM will maintain records showing that the third party is not a related party of SWM or located at the same address as SWM.
7. The client's qualified custodian will send the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

SWM provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, SWM generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

SWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SWM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SWM nor its management has any financial condition that is likely to reasonably impair SWM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

SWM has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

SWM currently has only one management person: Paul David Richard Barry. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

SWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

In November 2013 arbitration was initiated against Park Avenue Securities and Mark Sessanta based on allegations that FINRA Rules 2010 and 3270; NASD Rules 2110, 3030 and 3040: Sessanta participated in private securities transactions without providing prior written notice to his member firm. Specifically he referred firm customers to limited liability companies and the customers subsequently purchased interests totaling approximately \$317,000 being offered by these companies. Sessanta personally invested \$462,000 in the same limited liability companies. Sessanta completed annual compliance questionnaires for his firm wherein he acknowledged that he understood that he could not invest his own funds in a limited liability company and also that he could not facilitate a customer's investment in any business venture if doing so would constitute a private securities transaction. Sessanta sold equity-indexed annuities (EIAS) outside the scope of his employment with his firm and without providing his firm with any notice of the business activity. Sessanta's undisclosed EIA sales totaled about \$1,000,000. He received \$80,000 as compensation for the transactions. Sessanta completed annual compliance questionnaires for his firm wherein he acknowledged that he understood that he could not engage in any outside business activities without the prior written consent of the firm. The matter is no longer pending, as it was resulted in a civil and administrative penalty/fine of \$10,000 and a six month suspension that began 12/16/2013 and ended in 06/15/2014.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.