

## **Firm Brochure**

(Part 2A of Form ADV)

### **Safe Harbor Wealth Advisors, LLC**

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### **Branch Office**

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**Columbus, OH 43219**

This brochure provides information about the qualifications and business practices of Safe Harbor Wealth Advisors, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 614-760-0670 or by email at [cory@safeharborOH.com](mailto:cory@safeharborOH.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 Safe Harbor Wealth Advisors, LLC (IARD#284613) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

April 11, 2024

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. This update is in accordance with the required annual update for Registered Investment Advisors.

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### **Material Changes since the Last Update**

Since the last filing of this brochure on March 8, 2024, the brochure has been updated to disclose Cory Sickles is no longer registered as an investment advisor representative with Gradient Investments, LLC.

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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## Item 4: Advisory Business

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### Firm Description

Safe Harbor Wealth Advisors, LLC ("Safe Harbor") was founded in 2016. Cory Sickles is 100% owner.

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### Types of Advisory Services

#### CO-ADVISOR

Safe Harbor has entered into a Co-Advisor relationship with Gradient Investments, LLC (GI). Safe Harbor will provide information to each client regarding the services offered by GI as the portfolio manager. Safe Harbor will assist the Client to determine the appropriate model selection based on the Client's investment objectives and risk tolerance. Safe Harbor will have full discretion on an ongoing basis to select suitable models to maintain client's risk tolerance. Safe Harbor will share in the management fees charged by GI as described in Item 5 of this brochure.

#### FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Safe Harbor on a fixed fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. A conflict of interest exists between the interests of the investment advisor and the interests of the client. The client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Safe Harbor. Financial plans will be completed and delivered inside of thirty (30) days.

#### REFERRAL ARRANGEMENTS

Safe Harbor has legacy clients where Safe Harbor acted as a referring party for Gradient Investments, LLC. Any new clients placed with Gradient Investments, LLC will be through the Co-Advisor relationship described above.

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### Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

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### Wrap Fee Programs

Safe Harbor does not participate in wrap fee programs.

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### Client Assets under Management

Safe Harbor has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$100,939,000	\$668,000	December 31, 2023

## Item 5: Fees and Compensation

### Method of Compensation and Fee Schedule

#### CO-ADVISOR

Safe Harbor has entered into a Referral Agreement with Gradient Investments, LLC ("GI"). GI is a Registered Investment Advisor registered with the Securities and Exchange Commission that provides investment portfolio advice and supervisory services.

GI offers an actively managed program of mutual fund and stock portfolios. The fee will be disclosed to the Client in the Investment Advisory Agreement and are negotiable. The Client's fee for these services will be based on a percentage of assets under management as follows:

STRATEGIC & TACTICAL, ALLOCATION & DEFINED OUTCOME PORTFOLIOS			
	Annual Fee	GI	Safe Harbor
All Assets	1.60%	0.60%	1.00%

Traditionally, GI's Tactical Portfolio was billed with a max annual fee of 2.00%. Since GI is the sub-advisor to the Tactical Portfolio and will receive an annual fee of 0.20% from the ETF, GI has reduced its annual fee of the Tactical Portfolio so as not to double dip.

For example, a Client investing \$100,000 in the GI Tactical portfolio prior to November 2022 would pay an annual fee to GI of \$2,000 or  $\$100,000 \times 2.00\% = \$2,000$ . After November 2022 the same client would pay GI an annual fee of \$1,600 or  $\$100,000 \times 1.60\% = \$1,600$  and pay the internal fees of \$200 or  $\$100,000 \times 0.20\% = \$200$ . For a total of  $\$1,600 + \$200 = \$1,800$ .

PRESERVATION PORTFOLIOS			
	Annual Fee	GI	Safe Harbor
All Assets	1.00%	0.40%	0.60%

CLIENT DIRECTED ACCOUNTS			
	Annual Fee	GI	Safe Harbor
All Assets	\$300	\$300	\$0

For Client Directed Accounts (CDA), GI will assist in the opening, closing and transferring of accounts. GI will not have discretion at any time on these accounts. Client is solely responsible for the assets held within the accounts and their values which could increase or decrease (potential loss of principal). GI will not execute trades in CDA accounts. GI exceptions will be made for withdrawals to client or assets transferred into a GI managed portfolio. GI will also provide performance reporting on these accounts and can furnish 3<sup>rd</sup> party analysis reports per the client's request. Similar services may be available through other sources for a lower fee.

These are flat fee schedules, the entire portfolio is charged the same asset management fee.

Fee Calculation: (Quarter End Value x Annual Fee %) x (Days in Quarter/Days in Year) + **\$15 Quarterly Service Fee\***

\* The \$15 Quarterly Service Fee is the technology fee charged per account or investment strategy for performance and other reporting. This fee is disclosed in our ADV Part 2A



(Item 5: Fees and Compensation) and in our Investment Proposal and Contract (Schedule D: Schedule of Fees).

Example:

Portfolio	Calculation	Quarterly Fee
Strategic Portfolio, Tactical Portfolio, Allocation & Defined Outcome Portfolio:	$(\$750,000 * 1.60\%) * (91/365)$	\$2,991.78
Preservation Portfolio:	$(\$750,000 * 1.0\%) * (91/365)$	\$1,869.86

The above fees are negotiable. Fees are assessed quarterly in arrears based on the amount of the assets managed as of the end of the previous quarter. All management fees are withdrawn from the Client's account unless otherwise noted. GI will receive written authorization from the Client to deduct advisory fees from their account held by a qualified custodian. GI will pay Safe Harbor their share of the fees. Safe Harbor does not have access to deduct Client fees. Clients may terminate their account within five (5) business days of signing the investment advisory agreement without penalty or obligation. For terminations after the initial five business days, GI will be entitled to a pro-rata fee for the days service was provided in the final quarter. GI will pay Safe Harbor their portion of the final fee.

#### ***Incentive Program - GI***

In addition to the regular advisory fee, GI has instituted a long-term incentive arrangement by Safe Harbor can share in GI's portion of the management fee. This does not change the cost to the Client; it is a sharing arrangement paid from GI's portion of the advisory fee. The incentive arrangement will be paid annually according to the following table:

Safe Harbor Quarterly AUM with GI	Participation rate in GI's fee
\$10,000,000	3.00%
\$25,000,000	10.00%
\$50,000,000	12.50%
\$75,000,000	15.00%

Once Safe Harbor reaches and maintains the thresholds listed above, the participation rate applies to all of the AUM for the quarter.

To receive the incentive award, Safe Harbor needs to meet two qualifications. First, the quarter end billable AUM must be above the threshold amounts specified. Second, Safe Harbor must be an advisor "in good standing" with GI at the time the annual checks are issued. "In good standing" means the advisor is proactively placing assets with GI.

This relationship will be disclosed to the client in each contract between Safe Harbor and Third Party Money Manager. Safe Harbor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial Safe Harbor Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

#### **FINANCIAL PLANNING and CONSULTING**

Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. The payment is due upon commencement of the Advisory Agreement. Safe Harbor reserves the right to waive the fee should the Client implement the plan through Safe Harbor.

All plans are completed and delivered inside of ninety (90) days. Client may cancel within five (5) business days for a full refund. If client cancels after five (5) business days, client will be due a pro-rata refund or RFP will be entitled to a pro-rata fee for work completed whichever is applicable. If a refund is due to the client, it will be based on a rate of \$250 per hour for the amount of time spent completing the plan.

#### FIXED FEES

Financial Planning Services are offered based on a negotiable fixed fee with a maximum of \$2,500 based on complexity and unique client needs. Prior to the planning process the client is provided a plan fee and approximation of time for completed services.

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#### **Client Payment of Fees**

Co-Advisor fees are billed quarterly in arrears and deducted from client accounts.

Fees for financial plans are billed 50% in advance with the balance due upon delivery of the plan.

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#### **Additional Client Fees Charged**

When utilizing Third Party Money Managers, the custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Safe Harbor, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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#### **Prepayment of Client Fees**

Financial planning fees will be due, in full, at the commencement of the contract. Client may cancel within five business days of signing the Investment Advisory Agreement for a full refund. If client cancels after five (5) business days, client will be due a pro-rata refund or RFP will be entitled to a pro-rata fee for work completed whichever is applicable.

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#### **External Compensation for the Sale of Securities to Clients**

Safe Harbor does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Safe Harbor.

## Item 6: Performance-Based Fees

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### Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Safe Harbor does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Item 7: Types of Clients

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### Description

Safe Harbor generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

### Account Minimums

While Safe Harbor does not require a minimum to open an account, specific money managers may have a minimum to open an account. Minimum requirements by third party money managers will be disclosed in each money manager's brochure.

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

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### Methods of Analysis

If evaluating securities is part of the agreed upon financial planning Safe Harbor may use fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

### Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

### Security Specific Material Risks

All investment programs have certain risks that are borne by the investor.

The specific risks associated with financial planning include:

- Risk of Loss
  - Client fails to follow the recommendations of SWA resulting in market loss

- Client has changes in financial status or lifestyle and therefore plan recommendations are no longer valid

The risks associated with utilizing Third Party Money Managers (“TPM”) include:

- Manager Risk
  - the TPM fails to execute the stated investment strategy
- Business Risk
  - TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM’s which is disclosed in the TPM’s Form ADV Part 2.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action required to be reported.

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### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings required to be reported.

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### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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

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### **Broker-Dealer or Representative Registration**

Safe Harbor and no affiliated representatives of Safe Harbor are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither Safe Harbor nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Managing Member Cory Sickles has a financial affiliated business as an insurance agent and as the President of another insurance company. From time to time, he will offer clients advice or products from those activities. Approximately 50% of Mr. Sickles’ time is spent on his insurance practice.

Cory Sickles has an additional financial affiliated business as President and owner of Safe Harbor Health, LLC, where he has agents that provide Medicare supplements. Mr. Sickles spends around 1% of his time on his Medicare practice.

These practices represent conflicts of interest because it gives them an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and clients are not required to purchase any products. Clients have the option to purchase these products and/or through another insurance agent or investment advisor of their choosing.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Safe Harbor at times utilizes the services of Third Party Money Managers to manage client accounts. In such circumstances, Safe Harbor will share in the fees from the Third Party Manager. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Safe Harbor. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. For more details see Items 4 and 5 of this brochure.

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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 Description**

The employees of Safe Harbor have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Safe Harbor employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Safe Harbor. The Code reflects Safe Harbor and its supervised persons' responsibility to act in the best interest of their client.

One area in which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Safe Harbor's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Safe Harbor may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Safe Harbor's Code is based on the guiding principle that the interests of the client are our top priority. Safe Harbor's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the potential for conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are

involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Safe Harbor and its employees do not recommend to clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Safe Harbor and its employees may buy or sell securities that are also held by clients. In order to avoid conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Safe Harbor with copies of their brokerage statements.

The Chief Compliance Officer of Safe Harbor is Holly Veeck. She reviews all employee trades each quarter. The personal trading reviews helps mitigate that the personal trading of employees does not affect the markets and that clients of the firm have received preferential treatment over employee trades.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Safe Harbor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

## **Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

Safe Harbor may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. Safe Harbor will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Safe Harbor relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Safe Harbor.

- *Directed Brokerage*  
Safe Harbor utilizes Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- *Best Execution*  
Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. Safe Harbor does not manage client accounts. Safe Harbor only has the ability to select between different model portfolios managed by a third party money manager.
- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Safe Harbor from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Safe Harbor may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Safe Harbor receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Safe Harbor. Safe Harbor cannot ensure that a particular client will benefit from soft dollars or the client’s transactions paid for the soft dollar benefits. Safe Harbor does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Safe Harbor receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Safe Harbor has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

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**Aggregating Securities Transactions for Client Accounts**

Safe Harbor does not trade for its or its clients’ accounts and therefore aggregation of securities transactions is not applicable.

**Item 13: Review of Accounts**

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Cory Sickles, Managing Member and Investment Advisor Representative. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and an additional review is done only upon request of client.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients’ accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the Third Party Money Manager’s custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Under financial planning services, the client will receive a one-time written financial plan.

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

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### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Financial consultants may be eligible for cash and non-cash compensation including bonuses, recognition trips and other benefits. Some of these programs may be financed in whole or in part by unaffiliated third parties, including third party money managers, which may influence some representatives to favor those managers. See the prior sections entitled “Fees and Compensation” and “Other Financial Industry Activities and Affiliations” for more details regarding compensation and conflicts of interests.

Safe Harbor’s investment advisor representatives may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm’s fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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### **Advisory Firm Payments for Client Referrals**

Safe Harbor does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the Third Party Money Managers.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

Safe Harbor has discretion to select appropriate portfolios for clients, but does not have the discretion to select specific securities.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

Safe Harbor does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.



## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because Safe Harbor does not serve as a custodian for client funds or securities and Safe Harbor does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

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### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Safe Harbor has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

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### **Bankruptcy Petitions during the Past Ten Years**

Neither Safe Harbor nor its management has had any bankruptcy petitions in the last ten years.

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Supervised Person Brochure

Part 2B of Form ADV

**Cory Sickles, CFF®**

**Safe Harbor Wealth Advisors, LLC**

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**4449 Easton Way**

**Columbus, OH 43219**

This brochure supplement provides information about Cory Sickles and supplements the Safe Harbor Wealth Advisors, LLC brochure. Being registered as a registered investment adviser does not imply a certain level of skill or training. Please contact Cory Sickles if you did not receive Safe Harbor Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Cory Sickles (CRD#6319909) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**April 11, 2024**

## Brochure Supplement (Part 2B of Form ADV)

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### Principal Executive Officers and Management Persons

**Cory Joseph Sickles, CFF®**

- Year of birth: 1969

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### Educational Background and Business Experience

Educational Background:

- Ball State University; Communication Systems Management, Master of Science – 1993
- Ohio University; Communication and Bachelor of Science - 1991

Business Experience:

- Safe Harbor Wealth Advisors, LLC; Managing Member/Investment Adviser Representative; 07/2016 – Present
- Safe Harbor Health, LLC; President/Owner; 06/2019 - Present
- Safe Harbor Retirement Group, LLC; President; 02/2012 – Present
- Safe Harbor Financial Group, LLC; Insurance Sales; 02/2012-Present
- Gradient Investments, LLC; Solicitor; 04/2020-04/2024
- Safe Harbor Wealth Management, LLC; Investment Adviser Representative; 04/2014 – 08/2016
- Comdata Corporation; Transaction Processing; VP Product Development; 08/1993 - 02/2012

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### Professional Designations

Cory Sickles has earned certifications and credentials that are required to be explained in further detail.

Certified Financial Fiduciary® (CFF®) is a designation issued by the National Association of Certified Financial Fiduciaries.

CFF® designation requirements:

- Prerequisites: Candidate must either have 10 years of relevant work experience or 5 years of experience with a relevant bachelor's or graduate degree. Candidate must also complete the applicant profile, disclosure questionnaire and pass a criminal background check.
- Education requirements: In-person training class.
- Examination type: Final designation exam
- Continuing Education Requirements: 10 hours annually

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### Disciplinary Information

None to report

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### Other Business Activities

Investment Advisor Cory Sickles has a financial industry affiliated business as an insurance agent and as the President of another insurance company. From time to time, he will offer clients advice or products from those activities. More than 50% of his revenue results from commissions from the sale of insurance products. As an insurance

agent, he may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

Cory Sickles has an additional financial affiliated business as President and owner of Safe Harbor Health, LLC, where he has agents that provide Medicare supplements. Mr. Sickles spends around 1% of his time on his Medicare practice.

These practices represent conflicts of interest because it gives Mr. Sickles an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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### **Additional Compensation**

Cory Sickles does not receive any performance-based fees.

Mr. Sickles may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

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### **Supervision**

Since Cory Sickles is the sole owner and Managing Member of Safe Harbor Wealth Advisors, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. If you would like to contact Cory Sickles you may do so by phone at 614-760-0670 or email at [cory@safeharborOH.com](mailto:cory@safeharborOH.com).