



## Item 1: Cover Page

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### **ADV Part 2A Firm Brochure**

**Sequoia Wealth Management Group LLC**

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**March 31, 2024**

This brochure provides information about the qualification and business practices of Sequoia Wealth Management Group LLC. If you have any questions about the contents of this brochure, please contact us at 707-763-8600, or by email at [Matt@sequoiawmg.com](mailto:Matt@sequoiawmg.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 Sequoia Wealth Management Group LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration does not imply a certain level of skill or training, and no inference to the contrary should be made.

## Item 2: Material Changes

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There are no material changes since our last brochure dated February 6, 2023.



## Item 3: Table of Contents

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## Item 4: Advisory Business

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### **Firm Description**

Sequoia Wealth Management Group, LLC (“Sequoia”) is a Nevada limited liability company formed in 2010.

### **Principal Owners**

The principal owner of Sequoia is Matthew Schafer.

### **Types of Services**

Sequoia provides investment management, financial planning, and consulting services to individuals and small/closely held businesses, hereinafter referred to as (“Client”). At Sequoia we believe no two investors are alike and that each has different circumstances and aspires to different dreams. For all prospective Clients, Sequoia conducts a Discovery Meeting to deeply comprehend not only the Client’s investment objectives and risk tolerances, but also their most important values, goals, relationships and interests. This level of insight allows Sequoia to construct an investment plan appropriate for the Client, set the foundation for a long-term relationship, and work with the Client precisely the way they prefer.

#### **Investment Management Services**

Sequoia offers ongoing investment management services based on the individual goals, objectives, time horizon, and risk tolerance of each Client. Sequoia creates an Investment Policy Statement for each Client, which outlines the Client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Sequoia evaluates the current investments of each client with respect to their risk tolerance levels and time horizon and ability to meet their goals. Sequoia will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

#### **Financial Planning/Consulting Services**

Financial Planning/Consulting services may include but are not limited to life goal planning, business planning support, retirement planning consulting, estate and trust planning, and assistance with life and disability insurance. These services are generally inclusive of the firms’ investment management services; however, Clients may engage Sequoia separately for them as well. See the Fees and Compensation section below for how these services are billed.

#### **Other Services**

In addition to the above services and depending upon the Client’s individual needs, Sequoia may act as trustee or successor trustee. This service will always include an additional charge distinct and separate from any Investment Management and/or Financial Planning/Consulting fees. A description of services and fees associated are defined within the Client’s agreement with Sequoia.

## Tailored Relationships

All investment accounts will be managed in accordance to set model portfolios or strategies. The model portfolios or strategies recommended for the Client will be based on the Client's investment objectives, goals and risk tolerances. Sequoia will not allow Client's to impose restrictions on their investment accounts.

## Client Assets

As of December 31, 2023, Sequoia has discretionary regulatory assets under management of approximately \$247 million.

# Item 5: Fees and Compensation

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## Description

Sequoia is compensated for its investment management services through an asset-based fee, based on the fair market value of the assets managed. Fees are assessed quarterly in advance. The current fee schedule is:

\$450,000 - \$2,000,000	1.60%
\$2,000,001 - \$5,000,000	1.50%
\$5,000,001 - \$10,000,000	1.25%
Above \$10,000,001	1.00%

These fees include all financial planning and consulting services. There is a minimum flat fee of \$1,750 per quarter.

The fee is negotiable based on factors such as the size and complexity of the mandate, the services to be provided, anticipated additional assets to be added to the account, and other unique needs or attributes of the Client.

If a Client would like to engage Sequoia for financial planning/consulting services only, Sequoia will charge a project-based flat fee that is either fixed or an hourly rate based on the estimated time to complete the project. The total fee, terms and conditions for the project will be presented to the Client and documented in the consulting services agreement before any work is commenced. The estimated time to complete the project is based on the projected number of hours to: review documents, complete the analysis, create a customized findings' report and present the findings and recommendations to the Client. A non-refundable deposit of \$1,000 fee is required, with the balance due on completion.

If a Client would like to engage Sequoia for trustee and/or bill pay services, Sequoia will charge fees additional and separate to the fees described above. The fees are negotiable and will be fully disclosed in an executed agreement between the Client and Sequoia.

## **Fee Billing**

Sequoia deducts fees for the investment management services directly from Client accounts as authorized in writing by the Client in the investment advisory agreement. Fees for financial planning/consulting services only will be invoiced to the Client.

## **Other Fees**

Clients should note that there are other fees associated with their account in addition to Sequoia's advisory fee. For example, ETFs and mutual funds assess their own internal management and other fees. In addition, Clients may incur brokerage and other transaction charges (commissions), and custodial fees. These are assessed by the broker selected for execution and by the custodian(s) clients choose to hold their assets. Please see Item 12: Brokerage Practices for more information on Sequoia's approach to Clients' brokerage and custody options.

## **Fees Paid in Advance**

Our services may be terminated by either party at any time with 30 days written notice. Any pre-paid fees will be refunded pro-rata from the date of termination, which is determined as the 30<sup>th</sup> day after written notice, with the exception of the \$1,000 deposit for financial planning services only.

# **Item 6: Performance-Based Fees & Side-by-Side Management**

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Sequoia does not receive performance-based fees.

# **Item 7: Types of Clients**

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## **Description**

Sequoia provides services to individuals, estates and trusts, charitable organizations and small/closely held businesses.

## **Account Minimums**

The minimum account size for new accounts is generally \$500,000 per household, although Sequoia may elect to reduce or waive this requirement. There is no minimum account size required for only providing financial planning/consulting services.

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

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## Methods of Analysis

Sequoia's objective is to attain an efficiency where the standard deviation gets the maximum return, while taking risk that is compensable.

## Investment Strategies

Sequoia considers rolling ten-year periods when evaluating investments, strategies, and allocations. Portfolios will be held through market downturns. Rebalancing and the addition of new assets will be utilized as ways to capture opportunities during volatile markets. Tactical moves will be limited as it reflects a short-term activity that tends to conflict with the firm's longer-term planning. Sequoia will hold cash positions to ensure that planned and unplanned liquidity needs can be met. Cash positions reduce the need to sell holdings at inopportune times and allow the portfolios to weather market downturns. Investments need to serve the current needs of the clients while working towards future goals.

## Risk of Loss

Investing in securities involves a risk of loss that you, as a Client, should be prepared to bear. Some of the specific risks are listed below.

*Equity Securities Risk* - Stocks generally fluctuate in value more than bonds and may decline significantly over short time periods. There is the chance that stock prices overall will decline because stock markets tend to move in cycles, with periods of rising prices and falling prices. The value of a stock in which a fund invests may decline due to general weakness in the stock market or because of factors that affect a company or a particular industry.

*Exchange Traded Funds and Mutual Funds* - An investment in an ETF or mutual fund involves risk, including the potential loss of principal. Mutual fund and ETF shareholders are subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Shareholders in funds also are responsible for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event, they sell securities for a profit that cannot be offset by a corresponding loss. The managers of the ETFs and mutual funds selected also may make poor investment decisions that cause them to underperform the benchmarks to which they compare their performance.

*Fixed Income Security Risk* - Bonds have two main sources of risk. Interest rate risk is the risk that a rise in interest rates will cause the price of a debt security held by the fund to fall. Securities with longer maturities typically suffer greater declines than those with shorter maturities. Mortgage-backed securities can react somewhat differently to interest rate changes because falling rates can cause losses of principal due to increased mortgage prepayments and rising rates can lead to decreased prepayments

and greater volatility. Credit risk is the risk that an issuer of a debt security will default (fail to make scheduled interest or principal payments), potentially reducing income distributions and market values. This risk is increased when a security is downgraded or the perceived creditworthiness of the issuer deteriorates.

## Item 9: Disciplinary Information

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Neither the firm nor its supervised persons has any legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

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Sequoia nor any supervised persons of Sequoia is affiliated with any entity, registered as a broker-dealer, a futures commission merchant, commodity pool operator, or a commodity trading adviser.

Sequoia utilizes the services of 55ip, a third party and unaffiliated entity, to outsource trading activities within client accounts. There will be no additional charges to clients as a result and Sequoia will remain the discretionary investment advisor.

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

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### **Code of Ethics**

Sequoia seeks to avoid conflicts of interest that could arise if its employees engage in personal investing for their own accounts. Sequoia has adopted a Code of Ethics which defines the standard of conduct that employees are required to maintain. The Code of Ethics includes provisions relating to personal securities trading and reporting procedures, conflicts of interest, and insider trading among other things. All Sequoia personnel must acknowledge the terms of the Code of Ethics upon hire, and when amendments are implemented.

Clients or prospective clients may contact Sequoia to request a copy of the firm's Code of Ethics.

### **Invest in Same Securities Recommended to Clients**

Sequoia employees are permitted to buy and sell securities for their own personal investment accounts provided they comply with the Code of Ethics' procedures and reporting requirements which are designed to prevent any potential conflict of interest with client transactions. Sequoia believes that these procedures are adequate to prevent any intentional or inadvertent conflict of interest. However, it is possible that, from time to time, Sequoia may recommend to clients, or purchase for or sell from



clients' portfolios, securities that are also held in the personal investment portfolios of Sequoia employees.

### **Personal Trading Policies**

Sequoia has a policy in place to monitor the personal securities transactions and securities holdings of its employees and their immediate family members. Sequoia's policy requires that each employee and their immediate family members provide the Chief Compliance Officer with a written report of his or her current securities holdings within ten (10) days after becoming an employee and annually thereafter. In addition, each employee and their immediate family member must provide the Chief Compliance Officer transactions on a quarterly basis.

## **Item 12: Brokerage Practices**

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### **Selecting Brokerage Firms**

Sequoia selects the brokers and dealers to effect client transactions unless a client provides specific instructions about placement of brokerage. Sequoia evaluates brokerage firms in terms of their best execution capabilities. Best execution considers more than just whether the broker will provide the best price for the desired transaction. In addition to the best price, best execution considers the overall reasonableness of brokerage commissions paid and other factors such as the level of service provided, the receipt of research products and services, investment product availability, technology solutions and access to analysis of economic and market data.

Sequoia generally recommends to clients that they use either Raymond James Financial Inc. or Charles Schwab & Co, Inc. as the qualified custodian for their discretionary investment management account.

### **Research and Soft Dollars**

Sequoia does not participate in any formalized soft dollar arrangements. However, Sequoia may receive research and trading related products and services from brokerage firms, including Raymond James and Schwab. These products and services are generally made available to independent investment advisers such as Sequoia.

Sequoia's recommended brokerage firms, Raymond James and Schwab, have a commission structure for trading securities that is competitive with the structures used industry-wide for similar types of trading. Nonetheless, Sequoia's receipt of products and services creates a potential conflict of interest based on Sequoia's recommendation of Raymond James and Schwab. Sequoia's objectivity in evaluating brokerage firms could potentially be compromised. Sequoia seeks to manage this risk through its oversight of trading and any soft dollar products or services received.

### **Brokerage for Client Referrals**

Sequoia does not receive client referral from broker dealers.

### **Directed Brokerage**

Clients may direct Sequoia, in writing, to direct their brokerage, if the firm is capable. The client may pay higher brokerage commission and other fees that might otherwise be paid had Sequoia been granted discretion to select the broker. In addition, if a client directs Sequoia to use a particular broker, Sequoia may not be able to aggregate trades with other clients.

### **Order Aggregation**

Where feasible for transactions in the same security, Sequoia seeks to block orders for all clients into a single transaction with the objective of obtaining one average price for all participating clients. Sequoia follows this trade allocation policy among clients that are transacting in the same security. If an order is partially filled, the shares will be allocated to clients included in the batched order on a prorated basis based on the size of each participating client's order or with other methodologies designed to treat all clients fairly over time.

For block orders of a given security involving clients of multiple brokerage firms, Sequoia will place separate block orders per brokerage firm. Due to any timing difference in order entry and execution, clients of one brokerage firm may receive a different average price versus clients with another brokerage firm. Sequoia rotates the order of the respective brokerage firm trades to try to ensure that clients of a particular brokerage firm are not favored over other clients.

## **Item 13: Review of Accounts**

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### **Periodic Reviews**

All portfolios are reviewed by Matt Schafer, Founder. The model portfolios are reviewed throughout the year as needed. A formal review will occur with the Client as least annually and more frequently as needed.

### **Regular Reports**

Clients will receive a statement directly from their custodian on at least a quarterly basis that details the holdings and transactions.

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

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Sequoia does not have any solicitations or referral arrangements in place.

## Item 15: Custody

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Sequoia does not maintain physical custody of client assets. Sequoia is considered to have custody because the Client's investment management agreement gives us the authority to deduct fees directly from client accounts. All client assets are held with a qualified custodian; the custodian sends account statements directly to clients at least quarterly. Clients should carefully review these statements. In addition, Sequoia may offer trustee services to its advisory Clients. In such cases, the Firm is considered to have custody and Sequoia will obtain a surprise custody examination.

## Item 16: Investment Discretion

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Sequoia has discretionary authority to buy and sell securities held in the accounts of its clients. Clients grant Sequoia this authority by executing an investment management agreement with Sequoia. Sequoia executes transactions based solely on its assessment of which trades will best implement its stated strategy.

## Item 17: Voting Client Securities

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Sequoia does not vote proxies for clients. Clients are expected to vote their own proxies and receive their proxies directly from the custodian. Clients may contact us if they have questions on their proxies.

## Item 18: Financial Information

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Sequoia does not require or solicit prepayment of more than \$1,200 for six months; fees are billed and paid quarterly. Sequoia is not aware of any financial condition that is reasonably likely to impair its ability to meet contractual obligations to clients. Sequoia has never been the subject of a bankruptcy petition.