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Item 1 – Cover Page



STAVIS WEALTH TRANSFER SOLUTIONS, LLC  
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HOUSTON, TX 77056  
(713) 391-8200

February 28, 2024

This Brochure provides information about the qualifications and business practices of Stavis Wealth Transfer Solutions, LLC. If you have any questions about the contents of this Brochure, please contact us at (713) 391-8200. 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.

Stavis Wealth Transfer Solutions, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Stavis Wealth Transfer Solutions, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 – Material Changes**

This Firm Brochure provides you with a summary of Stavis Wealth Transfer Solutions, LLC advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

In the future, this Item of this Brochure will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of the Brochure.

### **MATERIAL UPDATE(S)/CHANGE(S)**

Item 4 – Advisory Assets Under Supervision was updated.

The Firm will provide you with a new updated Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting Deborah Stavis, Firm Managing Principal/CEO, at [dstavis@wealthtransfersolutions.com](mailto:dstavis@wealthtransfersolutions.com).

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**Item 4 – Firm Advisory Business**

Stavis Wealth Transfer Solutions, LLC (Stavis Wealth or Firm) is a newly-formed advisory and consulting firm that provides financial and estate advisory and planning services as well as related wealth transfer solutions to clients, for a fee. The Firm offers and provides integrated wealth planning management and wealth transfer services to high-net-worth (HNW) individuals and their families. Included is the coordination with attorneys regarding estate planning trusts and related vehicles, charitable organizations, private and family foundations, family offices, and other corporate and business entities. These services are designed to assist our clients in identifying and realizing their personal and family financial and wealth planning objectives in coordination with their other professional advisors. Stavis Wealth was founded and is majority-owned and managed by its Managing Principal Deborah Stavis.

Stavis Wealth, in offering financial/estate planning services and certain investment advisory supervisory services related to the client's insurance policy, may also provide advice with respect to both discretionary and non-discretionary sub-accounts (fully dependent upon each individual carrier's procedure). For such clients, we may provide other types of advisory services to the client from time to time, which can include investment policy advice and assistance, developing asset allocation strategies, manager selection and evaluation, and/or review of outside accounts to assist with adherence to investment policy guidelines. The types of service will be tailored to the needs of such clients and the availability of investment choices within each insurance policy. Services include an analysis based on client age, risk tolerance, and the availability and type of subaccounts (mutual-fund-like options) within each policy. When discussing investment options within a life insurance policy, both terms subaccount and Insurance Dedicated Funds (IDFs) may be used interchangeably.

Based upon client planning objectives and the client's expressed financial position, Stavis Wealth will prepare a financial, wealth and estate plan designed to meet client objectives. We offer financial and wealth planning to clients as an independent service or as part of additional advisory, planning and/or consulting services. Certain aspects of financial-wealth planning include furnishing of investment advice as defined by the Investment Advisers Act of 1940, as amended ("Advisers Act"), in which the Firm acts as a fiduciary under the Advisers Act. Financial planning services are provided to advisory clients through a variety of means, including through in-person meetings, video conferences, telephone calls, digital platforms, e-mail, reporting, or a combination thereof. We also have available to us and use a variety of proprietary and/or third-party tools to aid in delivering financial planning services to our clients. Implementation of financial and wealth planning strategies and recommendations is entirely at the client's discretion.

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Also, Stavis Wealth is not required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains the client's responsibility to promptly notify the Firm if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, and/or revising the Firm's previous recommendations and/or services. Managing Principal, Deborah Stavis, is available for consultations at (713) 391-8200 and to discuss any changes or updates to a client's financial situation.

For financial planning, a conflict may exist between the interests of the Firm and the interest of the client to the extent the Firm recommends itself to support and assist with the implementation of its financial and wealth planning recommendations. The client is under no obligation to act upon our recommendations, and, if the client elects to act on any of our recommendations, the client is under no obligation to effect any transactions through us. Also, neither we nor anyone associated with us are attorneys, and therefore no advice that we confer should be construed as legal advice.

### ***Planning, Consulting, and Analysis Services***

We offer stand-alone Financial, Estate, and/or Insurance Planning Services that typically encompass preparation of dynamic, easily understood and actionable recommendations, based on a thorough evaluation of clients' personal financial situation and objectives. The customized action plan specifies strategic measures for the clients' immediate implementation and execution into an existing financial, wealth transfer and estate plan.

The Firm works with HNW individuals and families on their planning needs, including:

- ] Estate/Legacy Planning|
- ] Wealth Planning & Multi-Generational Planning (Stewardship of family wealth)|
- ] Wealth Transfer Planning and Solutions|
- ] Trust Planning & Trust Policy Management|
- ] Strategic Planning and Family Governance|
- ] Asset Protection|
- ] Insurance Analysis & Risk Management|
- ] Philanthropic/Charitable Planning & Giving|

The Firm works with business owners to develop plans for:

- ] Ownership transitions|
- ] Key employee retention|

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Planning is a dynamic and continuous process. The following is brief summary of the process we follow in estate and financial planning.

- ) **Discovers** to understand what the client is most committed to accomplish, fix or avoid, and collects financial information|
- ) **Analysis** of client's current situation, with special emphasis on uncovering gaps, inefficiencies and opportunities. "What if" scenarios are modeled to determine the short and long-term impact of planning options|
- ) **Quantifies** the impact of recommended solutions, using flowcharts, graphs and state of the art planning software|
- ) **Collaborates** with the client's multi-disciplinary team in order to provide a balanced viewpoint and help the client make informed decisions.|
- ) **Provides** observations and recommendations.|
- ) **Implements** the clients' desired estate planning decisions.|
- ) **Monitors** the clients' progress. Repeat the process as circumstances warrant.|

### ***Financial-Wealth Planning***

Stavis Wealth Transfer Solutions offers Financial Planning to clients as an independent service or as part of another service offering. Certain aspects of Financial Planning include delivery of investment advice as defined by the Investment Advisers Act of 1940, as amended ("Advisers Act"), in which Stavis Wealth Transfer Solutions may act as fiduciary under the Adviser's Act. Financial Planning varies among Wealth Advisors, clients, and the tools utilized by Wealth Advisors, as explained in more detail in Item 4 – Tools for Financial Planning; Tailoring Financial Planning below. Not all clients receive Financial Planning.

Financial Planning generally focuses on planning related to compensation and employment benefits, cash- flow, retirement, estate, insurance, investment, philanthropic, and tax, as may be appropriate. Depending on the level of service, Financial Planning is provided to the client either through meetings or digitally whereby the Wealth Advisor and the client will work together to develop a written or verbal financial plan and, with client cooperation, will endeavor to review risk profiles and objectives with clients no less than annually and update the financial plan to account for changes in the client's situation. Stavis Wealth clients are not required to implement their financial plans through products and services offered by Stavis Wealth Transfer Solutions or its affiliates (each in their capacities as asset managers, insurance agencies, a bank or broker-dealers, as applicable).

Clients deciding to implement any portion of their financial plans through Stavis Wealth Transfer Solutions, or its affiliates generally do so by entering into separate agreements with Stavis Wealth Transfer Solutions or an affiliate. Stavis Wealth Transfer Solutions does not have discretion over specified client assets as part of Financial Planning but may have discretion as part of Assets under Supervision. Corporate Partners often have other relationships with Stavis Wealth as vendors, partners, or clients and they, their employees, or participants may receive benefits or preferential fees or rates as a result of such other relationships. See Item 5- Negotiated Fees and Item 11 – Code of Ethics, Participation or Interest in Client Transactions.

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In addition to the above services, Financial Planning is also offered to supplement advisory services made available to certain current or prospective clients serviced by other RIAs. Private Wealth Advisors (“PWA s ”) , advisory personnel with other RIAs and family offices. When Stavis Wealth Transfer Solutions provides Financial Planning only to current or prospective clients they undertake no responsibility for, and provide no investment or brokerage services related to, such clients’ investment accounts unless otherwise agreed to in writing.

**Stavis Wealth Transfer Solutions offers Financial-Wealth Planning through the various programs described below:**

***Executive Wealth***

Executive Wealth programs and services offered by Wealth Advisors are made available to executives and high-net-worth clients directly or through an RIA or family office. Comprehensive estate and financial plans intended to maximize compensation and benefit programs, preserve and/or grow assets, manage income on a long-term basis, and integrate tax, retirement, and estate plans and goals. In order to deliver comprehensive financial planning services, Wealth Advisors analyze a number of factors, including, as applicable, the client’s financial status, sources of income, assets, personal obligations and debts, objectives, commitments, cash flow, family responsibilities and the effect of the existing income and estate tax structure on the client’s sources of income and accumulation of wealth.

***Family Office***

Family Office services are designed to help individuals and families with significant wealth manage their complex financial affairs. Family Office services can be provided to clients directly or through an RIA and often includes work with several generations within one client family and coordination with the individual’s or family’s other advisers (as directed). In many cases, Family Office services offer high-net-worth individuals and families an alternative to creating their own family office. Services include estate and trust planning and insurance policy trust management, review and evaluation of subaccounts within life insurance, portfolio monitoring, philanthropic and foundation planning, cash flow planning, tax planning and insurance audits.

***Tools for Financial Planning***

As referenced above, Financial Planning services are provided to clients through a variety of means, including through in-person meetings, video conferences, telephone calls, digital platforms, e-mail, reporting, or a combination thereof. Wealth Advisors have available to them a variety of proprietary and third-party tools to aid in delivering Financial Planning services to clients.

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***Tailoring Financial Planning***

Financial Planning is typically designed to be personalized to the client, including such client's unique circumstances and needs, personal financial goals, net worth, and/or complexity. Accordingly, the scope, duration, advisory personnel, deliverables, and channels through which Financial Planning is provided will vary among clients and services based on a variety of factors. Financial Planning will also vary among clients as a result of agreements with Stavis Wealth. Stavis Wealth will develop programs with Community-Based Partners. Financial and Estate Planning programs will vary among organizations participating. Certain programs may be tailored to address certain corporate partner needs or client events.

Financial and Estate Planning does not always address every aspect of a client's financial life. Omission of one or more financial planning topics from discussions with Wealth Advisors may be the result of differences and/or insufficient information provided by or on behalf of a client. Such omissions do not indicate that the Financial Planning topic is not relevant or applicable to the client's financial situation, and clients are encouraged to consult with their other advisors regarding such topics (e.g., tax and legal counsel). In some situations, clients may be eligible for reduced or waived fees due to certain arrangements, such as legacy relationships.

***Reliance on Information in Financial Planning***

In providing Financial Planning, Stavis Wealth relies on the accuracy and completeness of information provided by or on behalf of clients and does not assume responsibility to independently verify the accuracy or completeness of such information. Stavis Wealth does not assume responsibility to review, respond to, or incorporate into its services any materials uploaded by or on behalf of the client to any electronic storage system made available to clients. Clients must consult with and inform their designated Wealth Advisor regarding any specific materials they would like to include in the services.

***Insurance Services***

Individuals affiliated with the Firm provide insurance and design recommendations to clients, as appropriate. We represent a wide range of life insurance, annuities, disability and long-term care products.

- ) Periodic monitoring of sub accounts within variable life insurance and annuity policies. |
- ) Annual trust policy management, including policies held within an irrevocable trust |
- ) Establish Trust related accounts to facilitate premium payment. |

With the exception of ongoing asset monitoring and investment supervisory services, assuming prompt provision of all information from the client, our financial planning

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services are typically completed within 30-60 days of our engagement. Unless specifically requested by the client and agreed in writing, our performance of these services is typically accompanied by a formal written financial plan. On occasion, planning may be done on a project basis which may take the form of an informal written summary or checklist of action items and recommendations. Our final set of recommendations will be updated at least annually or upon a client's specific request and upon re-engagement of our firm for such update(s) and the payment of a new advisory fee. Implementation of our recommendations will be at the exclusive discretion of the client and may be completed by our firm for an additional cost as agreed in writing. The client is under no obligation to use our firm to implement any recommendations provided.

### ***Tailored/Customized Advisory Services – Financial/Wealth & Estate Planning***

Stavis Wealth offers personalized financial and estate planning advisory services, developed as a hybrid of any of the foregoing service offerings that are tailored to the unique needs of the client's situation and financial reality. During the first information share meeting we will determine an appropriate mix of services based on the needs and circumstances of the client. The advice we provide is driven by each client's individual, financial objectives, goals, personal risk assessment, liquidity needs, generational requirements, charitable desires, coordination of estate and trust planning documents with their attorney, and accountant for tax considerations. According to these needs, we develop and recommend an appropriate strategic plan.

-Examples of the products we might recommend include: life insurance, both fixed and variable, (including private placement life insurance), annuities, variable annuities, long-term care, and disability.

### ***Ancillary Services***

Upon request, we may review a client's existing estate plan and make recommendations in conjunction, with legal and accounting advisors, to provide guidance regarding the probate process, coordination, control, and distribution of assets to several various entities. These services offered in collaboration with legal counsel are provided to address certain issues with estate taxes, post-mortem control of assets, and other key details of a client's post-mortem plan.

### ***Trust Policy Management***

- ) Notices regarding the timing of the gift to the Trust checking account|
- ) Notification to beneficiary regarding withdrawal rights (Crummey Powers); continuous updating to the number of beneficiaries for utilizing the annual gift tax exclusion(s)|
- ) Notification to Trustee regarding timing of premium payment|
- ) Handle administrative policy details such as resignation and appointment of Trustees, change of address, etc.|

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***Supervising/Oversight Advisor to Insurance Dedicated Funds within PPLI/PPVA***

Stavis Wealth may recommend that certain clients invest in private placement life insurance ("PPLI") and private placement variable annuities ("PPVA"). When recommending PPLI, Stavis Wealth refers the client to appropriate insurance carriers in order to evaluate the individual Client's specific needs and, when appropriate, may recommend a PPLI policy. After the PPLI policy is created, Stavis Wealth may be hired by the Client insured under the PPLI policy as a supervising or oversight advisor to help supervise the assets of the policy. The PPLI policy is a sponsored insurance dedicated fund ("IDF"). An IDF may also operate as one or more private investment funds each being organized as a designated series (each a "Fund") that is housed within an investment sub-account. Such IDFs are offered solely to segregated asset accounts of insurance companies established for the owners of private placement variable life insurance contracts or private placement variable annuity contracts. Each Fund typically has the ability to invest globally in speculative investments utilizing a variety of financial vehicles, including without limitation, funds, private investment vehicles, hedge funds, stocks, bonds, pools, warrants, options, preferred and convert debt and equity, real estate and any other investments which may be legally invested in by the Fund under applicable law. The investment strategy applicable to investments in all Funds varies from seeking capital preservation to capital appreciation. Investors in the Funds may not impose restrictions on the types of securities purchased.

***Private Placement Insurance Programs & Investment Sub-Accounts***

Through insurance sponsors or insurance broker/agents, accredited investors may choose to invest in PPLI or PPVA with the segregated investment account managed under the insurance sponsor's PPLI or PPVA investment sub-account program. PPLI is a variable universal life insurance policy that provides a segregated investment account and a life insurance benefit. PPVA enables investors to defer income tax on investment gains without the traditional retail variable annuity features such as income guarantees or principal protection, thus reducing the internal fees. The life insurance portion of these products is provided through the insurance sponsor company.

***Financial Planning and Consulting Services***

Stavis Wealth Transfer Solutions can provide financial planning and/or consulting services (including estate planning, insurance planning, divorce planning, etc.) to the extent specifically requested by a client. Financial and Estate Advisory planning or consulting fees are negotiable as described in Item-5 Fees and Compensation.

Stavis Wealth Transfer Solutions provides certain clients with access to an online platform hosted by eMoney Advisor Advisors, LLC ("eMoney"). The eMoney platform allows a client to view their complete asset allocation, including those assets that Stavis Wealth does not manage. The Firm does not provide investment management, monitoring, or implementation services for any assets.

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The eMoney platform also provides access to other types of information and/or reports, including financial planning concepts. The generated information and/or reports are provided for educational purposes only and the client ***should not*** rely on it as the primary basis for insurance, investment, financial, and/or tax planning decisions. The generated report is not a recommendation of any investment strategy or transaction, rather it is a tool for Stavis Wealth and the client to collaboratively: (i) confirm the accuracy of the information on the client's risk tolerance and other personal and financial information, and (ii) solicit the client's input and feedback to refine the approach for the client's financial future. Stavis Wealth Transfer Solutions shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without Stavis Wealth Transfer Solutions assistance or oversight.

### ***Multi-Generational Strategic Planning & Family Retreats***

Stavis Wealth offers Family Retreats, typically a full day with the entire family in a non-office setting (including multi-generational family members). Each family participant completes a behavioral assessment that explores "how" they behave in various financial situations and their "why", which reflects their values.

Stavis Wealth combines financial information with the family dynamics utilizing the profile of each family member. A meeting typically includes a review of family assets, estate and income tax forecasts, along with ways to minimize estate tax. Ways to reduce estate tax, ranging from design ideas such as Family Limited Partnerships, Trusts and charitable gifts, whether in a Donor Advised Fund or a Private Foundation, provide ways to reduce the estate tax, along with a discussion of the most economic ways to pay the estate tax and examine ways to overcome misalignment among family members. Critically, we examine and help develop ways to align family members regarding an optimum estate and philanthropic strategy.

### ***Advisory Supervisory Services***

Stavis Wealth does not provide investment management services or manage assets on a fee basis. The Firm does provide certain investment advisory supervisory services and associated with the sub-accounts that exist in variable insurance products.

Options for investing the cash value within life insurance contracts are expanding at a significant rate, which creates:

- ) Analysis of clients' risk tolerance|
- ) At least a quarterly review of both asset allocation within the subaccounts and the need for more active investment within the cash value of the policy to properly assess client risk tolerance, offer significant optionality and|
- ) Active management within sub accounts may require additional monitoring at least quarterly|

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) Provide an annual update and performance report on each insurance policy|

The Firm accepts discretion to allocate and reallocate insurance related investment subaccounts as part of its advisor supervisory services for clients. Advisory clients may grant us, respectively, discretion to: (a) select variable subaccounts for clients' existing variable annuities and (b) allocate and reallocate any premiums among the variable subaccounts available from the specific annuity sponsor. In performing variable subaccount allocation services, the Firm will only consider the variable subaccount investment options available within the specific insurance or annuity purchased by the client. The Firm does not determine which variable subaccount options are made available by insurance companies or product sponsors, and variable subaccounts are not custodied at the Firm. If a client has not granted discretion regarding variable subaccounts as described above, the Advisers may provide clients with education regarding asset allocation principles or examples of model portfolios.

### ***Assets Supervised/Managed***

As of February 28, 2024, the Firm has total advisory assets under supervision of approximately \$53.8 million, consisting of \$0 on a discretionary basis and approximately \$53.8 million on a non-discretionary basis.

### **Item 5 – Fees and Compensation**

The specific manner in which fees are charged by Stavis Wealth is established in an advisory client's written advisory services agreement with the Firm. Our advisory agreement does not include any assets under management or AUM fees on the subaccounts within a life insurance policy for which the Firm is providing supervisory services. These services are provided for clients who either have, or plan to purchase, life insurance policies through Stavis Wealth.

We receive the following advisory and financial/wealth planning fees in connection with our services to clients. All client fee arrangements are set forth in written advisory agreement. Fees are generally calculated on an annual project basis, payable at the time of engagement, and are due upon receipt of invoice. Either party may terminate the financial/wealth planning and/or estate planning agreement within 30 days.

### ***Financial/Estate & Wealth Transfer Planning Advisory Fees***

Our Firm charges advisory fixed-fees for financial/wealth, estate, and philanthropic planning services, on a case by case basis. Total fees charged are generally based on the scope and complexity of the engagement and the time, research, and other resources that will be devoted to complete the services.

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**FINANCIAL/ESTATE PLANNING & WEALTH ADVISORY FEE SCHEDULE**

<b>NET WORTH (\$ in Millions)</b>	<b>BASIS POINT % APPLIED</b>	<b>FEE STRUCTURE</b>
<b>\$0 - \$25</b>	<b>(Not Applicable)</b>	<b>\$25,000 (Fixed)</b>
<b>Next \$25</b>	<b>1 BPS (1.0%) per Million</b>	<b>\$50,000 (Maximum)</b>
<b>Next \$50</b>	<b>1 BPS (1.0%) per Million</b>	<b>\$100,000 (Maximum)</b>
<b>Next \$100</b>	<b>.50 BPS (1.0%) per Million</b>	<b>\$150,000 (Maximum)</b>
<b>Over \$200</b>	<b>.25 BPS (1.0%) per Million</b>	<b>\$250,00 (Minimum)</b>

Fixed-Fees generally range from \$5,000 to \$100,000 depending on the mix of assets, scope and complexity of the engagement. The above fees exclude charges from other professionals during the course of the engagement such as Attorneys, CPAs, Business Valuation Experts, and Trustee fees.

***Estate-Financial Planning Project Services***

A flat or fixed project fee shall be paid to our Firm for standalone financial planning/consulting services as agreed by the parties in writing based on the scope and complexity of such services.

***Trust Policy Management Services***

The Firm will charge a \$3,500 annual fee, payable at time of engagement, in order to maintain the integrity of the estate plan and specific trusts, as they relate to the estate and estate tax protection plan. The processes and multi-step services are listed above.

In any year where a financial and estate planning fee is paid by the client, the cost of trust policy management servicing in an irrevocable trust, the trust policy management fee will be included in the annual financial planning retainer, rather than charged as a separate fee.

Stavis Wealth Transfer Solutions reserves the right to extend Trust Policy Management Services to legacy clients per a different fee schedule, including up to a waiver of the fee.

***Family Retreats***

Full-day family meetings generally have an associated \$10,000 fee, excluding airfare and hotel expenses. Stavis Wealth retains the right to modify this fee based on complexity and content, agreed upon by client.

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***Brokerage Products & Related Commissions***

Firm's Managing Principal earns additional compensation if a client purchases investment products through Purshe Kaplan Sterling Investments (PKS) where the Managing Principal is also affiliated as a registered representative. This compensation is in the form of fee commissions. Because of receipt of this economic benefit, the Firm has a potential conflict of interest if it recommends to its advisory clients that they purchase investment products through PKS. This gives us an incentive to recommend investment products based on the compensation that the Managing Principal will receive. Nonetheless, we believe that we have addressed this conflict of interest because clients are under no obligation to purchase investment products through PKS or the Firm's staff. Further, advisory clients have the option to purchase investment products that we recommend through other brokers or agents not affiliated with the Firm. Any commission/fee that individual Firm staff receives from the sale of investment products is in addition to the advisory fee the Firm charges, which advisory fee will not be reduced to offset the commission/fee that is received.

***Insurance Products & Related Commissions***

Commissions are also received for insurance policies placed, which are dependent on product type, rating, premium, and any specific client objectives. The Firm's Managing Principal also earns additional compensation from insurance companies in the form of fee compensation for all insurance in force and will receive compensation for the sale of insurance products from advisory and non-advisory clients. Please see further information in Item 10 below relating to the additional registrations and affiliations disclosed in this Item 5, including information pertaining to conflicts of interest arising out of these other registrations and affiliations of certain Firm staff.

***Sharing of Financial and Estate Planning Fees***

In certain instances from time to time, Stavis Wealth may pay certain fees to private wealth managers that obtain financial data and client objectives in coordination with the governing estate plan. Such fees will be disclosed to the client in a separate form, and the amount will vary based upon the time and effort expended by the private wealth manager.

***Additional Information***

As indicated above, Stavis Wealth may price its advisory services based upon various objective and subjective factors. As a result, Stavis Wealth's clients could pay diverse fees based upon the complexity of the engagement, and the level and scope of the overall financial advisory/estate planning services to be rendered. As a result of these factors, the services to be provided by Stavis Wealth to any particular client could be available from other advisers at lower fees.

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

Stavis Wealth does not currently charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Any related performance-based fee compensation will be applied and assessed in accordance with the SEC Performance Fee Rule (Rule 205-3).

**Item 7 – Types of Clients**

Stavis Wealth provides financial, wealth and estate planning advisory services and related wealth transfer consulting services to individual and high-net-worth investors, family offices, trusts, charitable organizations and foundations, and small business companies and other corporate clients.

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

Stavis Wealth's methods of analysis and investment strategies is focused on investment advisor supervisory services, which does not include an asset management fee. Additionally, regarding the cash value within life insurance contracts (sub-accounts) and related sub-account investment or allocation options.

Variable Insurance & Variable Annuities ("VA"): Variable insurance and VAs are types of insurance or annuity contracts that allow for the accumulation of capital on a tax-deferred basis. As opposed to a fixed annuity that offers a guaranteed interest rate and a minimum payment at annuitization, VAs offer investors the opportunity to generate higher rates of return by investing in equity and bond sub-accounts. If a VA is annuitized for income, the income payments can vary based on the performance of the subaccounts. Risks associated with VAs may include:

- Taxes and federal penalties for early withdrawal;
- Enduring surrender charges for early withdrawal;
- Earnings taxed at ordinary income tax rates;
- Mortality expense to compensate the insurance company for insurance risks;
- Higher fees and expenses imposed for the subaccounts;
- Other features with additional fees and charges; and
- Investment losses.

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Private Placement Life Insurance (PPLI) & Private Placement Variable Annuities (PPVA): PPLI and PPVA products are long-term investments similar to variable life insurance products, except that purchasers are able to invest policy premiums into various alternative investments. In addition to the risks associated with VAs set forth above, PPLI and PPVA products also present the risk that, as unregistered securities products, they are not subject to the same regulatory requirements and oversight as their registered counterparts. PPLI and PPVA products are not suitable for all investors. An investment in PPLI or PPVA products is subject to fluctuating values of the underlying investment options and it entails risk, including the possible loss of principal. You should consider the investment objectives, risks, charges, and expenses of any PPLI or PPVA product carefully before investing. Additional risk disclosures and other important information about PPLI and PPVA products are contained in their offering memorandums, which clients are urged to carefully review with their tax and legal advisors before investing.

The Firm may manage various variable insurance or annuity sub-accounts that are maintained directly with the insurance sponsor ("Sponsor"). Although such variable products and their respective sub-accounts may be represented on various reports or statements, the variable products are held directly with the Sponsor. Sub-account asset allocations may be limited by the Sponsor's product fund options, and certain asset allocations may also be restricted by the Sponsor. In such cases when a reallocation is required, the Firm will direct and execute such reallocation transactions directly through the Sponsor. Clients must complete necessary documentation under the applicable variable insurance or annuity contract to grant the Firm access to information necessary to perform these services. Where client purchases a variable insurance or annuity contract, client will receive a prospectus or private placement memorandum (PPM) and should rely solely on the disclosure contained in such prospectus or PPM with respect to the terms and conditions of the variable insurance or annuity investment product. Client should also be aware that certain riders purchased with a variable insurance or annuity contract may limit the investment options and the ability to manage the sub-accounts.

***Risk of Loss***

Stavis Wealth does not guarantee the future performance of sub-accounts managed or any specific level of performance, the success of any investment decision or strategy. The client understands that investment decisions made for the client's sub account(s) are subject to various market, economic, political, and business risks. These investments are only recommended to sophisticated clients who meet required net worth and income qualifications. Clients are reminded that investing in any security entails risk of loss they should be willing to bear.

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**Item 9 – Disciplinary Information**

Stavis Wealth has no disciplinary actions in its history and has no information applicable to this Item.

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

Stavis Wealth is not and does not have a related company that is a (1) broker/dealer, municipal securities dealer, government securities dealer or broker, (2) investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund), (3) futures commission merchant, commodity pool operator, or commodity trading advisor, (4) banking or thrift institution, (5) accountant or accounting firm, (6) lawyer or law firm, (7) insurance company or agency, (8) pension consultant, (9) real estate broker or dealer, or (10) sponsor or syndicator of limited partnerships.

***Other Financial/Investment Industry Activities***

Any requested brokerage services or sales of investment brokerage products will be provided under a commission-based brokerage relationship with securities offered through Purshe Kaplan Sterling Investments (“PKS”), Member FINRA/SIPC, Headquartered at 80 State Street, Albany, NY 12207. Purshe Kaplan Sterling and Stavis Wealth Transfer Solutions are not affiliated companies. Under such an arrangement, you may implement securities transactions through Firm Managing Principal Deborah Stavis or Financial Professional Kayla Tolunay in their respective capacity as a registered representative of PKS, a financial services company registered with the Financial Industry Regulatory Authority (“FINRA”) as a broker-dealer engaged in the offer and sale of securities and investment products. Brokerage commissions may be charged by PKS to process these securities transactions and thereafter, a portion of these commissions may be paid by PKS to our Firm’s PKS affiliated staff. Prior to effecting any securities transactions, you will be required to enter into a new account agreement with PKS. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers.

The receipt of commissions creates an incentive to recommend those products for which a commission will be received. Consequently, the objectivity of the advice rendered to clients could be biased. This potential conflict of interest is controlled by generally informing clients of both the advantages and disadvantages of establishing commission-based accounts with PKS versus a fee-based advisory account through Stavis Wealth. Please be aware that you are under no obligation to purchase products or services recommended by us or members of our Firm in connection with providing you with any advisory service that we offer.

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Also, certain investment product sponsors may provide Stavis Wealth with other economic benefits as a result of the recommendation or sale of the product sponsors' investments. The economic benefits received by Stavis Wealth from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist Stavis Wealth in providing various services to clients. Although Stavis Wealth endeavors at all times to put the interest of their clients ahead of those of Stavis Wealth's officers or representatives ("affiliated persons"), these arrangements present a conflict of interest which could affect judgment when recommending investment products.

### ***Other Industry Affiliations & Arrangements – Insurance***

Certain of Stavis Wealth's advisory affiliates, including Firm Managing Principal Deborah Stavis, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a commission basis, the purchase of certain insurance products. Stavis Wealth does permit such affiliated persons, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients and may receive compensation for the sale of such insurance products from advisory and non-advisory clients. A conflict of interest may exist to the extent that Stavis Wealth recommends the purchase of insurance products where Stavis Wealth's affiliated persons receive insurance commissions or other additional compensation.

Variable life insurance or variable annuity business is also placed through PKS, although the actual contracts are issued and serviced by insurance companies. Life insurance business is generally placed through insurance brokerage houses. A conflict of interest exists when Stavis Wealth recommends a commission-based product. The advisory client is informed of this inherent conflict and that the client can purchase the recommended insurance product from another agent.

We also serve as a member of First Financial Resources (FFR Group), an invitational member association. The FFR Group is engaged to assist Stavis Wealth to select highly rated life insurance carriers that can provide clients with "Best in Class" support. Its insurance carriers generally include, but are not limited to, American General, Delaware Life, Genworth, John Hancock, Lincoln, MetLife, Nationwide, One America, Pacific Life, Penn Mutual, Principal, Prudential, Securian and State Life. Insurance company licensing appointments are generally set up both by carrier and the state in which business is conducted, and such insurance carriers typically identify both the writing agent and the servicing agent for each insurance product policy.

Where insurance carriers are selected by the client, the Firm Managing Principal will receive compensation for the sale of insurance products to advisory and non-advisory clients. For clients who purchase products causing commissions to be generated from such purchases, these commissions are paid to the Firm Managing Principal in her separate capacity as an insurance agent. This activity represents a conflict of interest and may give her an incentive to recommend the purchase of insurance products for a client account

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based on that person's ability to receive compensation from such a purchase. However, the Firm believes that it has addressed this conflict by (a) requiring that any such transaction will be on commercially reasonable terms that are generally consistent with industry standards, and (b) neither requiring nor expecting that a client will purchase any such insurance product from or through Firm Managing Principal. In addition, the Firm Managing Principal must maintain compliance with applicable rules and regulations that govern the sale of such products.

#### ***Other Fee-Sharing Arrangements – Financial/Estate Planning Fees***

In certain instances, Stavis Wealth may pay certain fees to private wealth managers/advisors that work in collaboration with the Firm and its staff and that obtain financial data and client objectives in coordination with the governing estate plan and our related Firm services. Such fees will be disclosed to the client in a separate form, and the amount will vary based upon the time and effort expended by the private wealth manager.

#### ***Insurance Commissions – Fee Sharing***

In certain cases, commissions may be shared with other licensed advisors. Any and all sharing arrangements are disclosed to the client in advance of any transaction.

### **Item 11 – Code of Ethics**

Stavis Wealth's Code of Ethics covers all supervised persons of the firm and describes its standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and personal securities trading and reporting procedures, among other things. All supervised persons at Stavis Wealth must acknowledge the terms of the Code of Ethics annually and also follow the Firm's Code of Ethics.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Stavis Wealth will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Employee trading is monitored on a quarterly basis under the Code of Ethics to reasonably prevent conflicts of interest between Stavis Wealth and its clients. To supervise compliance with its Code of Ethics, the Firm requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Compliance department. The Firm also requires such access persons to receive approval from the Compliance department prior to investing in any initial public offerings or private placements. Stavis Wealth's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Deborah Stavis, Firm Managing Principal/CEO, at [dstavis@wealthtransfersolutions.com](mailto:dstavis@wealthtransfersolutions.com).

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It is Stavis Wealth's policy that the firm will not affect any principal or agency cross-securities transactions for client accounts. Stavis Wealth will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

### **Item 12 – Brokerage/Trading Practices**

Stavis Wealth does not conduct Brokerage activities nor do we recommend Broker Dealers and/or custodians. Noted above; variable life insurance business is conducted through PKS, whereby insurance commissions are received.

#### ***Custodian & Broker(s) Usage***

Stavis Wealth does not maintain custody of client assets.

#### ***Selecting & Using Brokers/Custodians***

Stavis Wealth does not use a Broker/Custodian.

#### ***Brokerage and Custody Costs***

Brokerage and Custody Costs do not apply to Stavis Wealth.

#### ***Research/Additional Benefits***

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular independent broker-dealer/custodian, Stavis Wealth from time to time receives from such broker-dealer/custodians without cost (and/or at a discount) support services and/or products, certain of which assist Stavis Wealth to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Stavis Wealth may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by the Firm in furtherance of its investment advisory business operations.

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As indicated above, certain of the support services and/or products that may be received will assist Stavis Wealth in managing and administering client accounts. Others do not directly provide such assistance but rather assist Stavis Wealth in managing and further developing its business enterprise and operations. However, there is no corresponding commitment made by the Firm to such broker-dealer/custodians or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above broker-dealer/custodians arrangements.

### ***Sharing of Financial and Estate Planning Fees***

In certain cases as described above, Stavis Wealth may share and pay certain advisory fees to private wealth managers that obtain financial data and client objectives in coordination with the governing estate/financial plan. Such fees will be disclosed to the client in a separate form, and the amount will vary based upon the time and effort expended by the private wealth manager.

### **Item 13 – Review of Accounts**

Review of subaccounts within insurance policies, are reviewed quarterly. Such reviews entail a written report regarding overall asset allocation and the individual holdings within each policy subaccount, on an annual basis, in accordance with each client's investment objectives, risk tolerance. Additional reviews are triggered by events, such as a client meeting; a request for withdrawal from a loan, or deposit into an account; a change in a client's risk tolerance, financial position or investment/estate planning objectives; a change in a company or fund's management; unusual market or economic circumstances; or other unforeseen event(s). The Firm encourages clients to meet with estate planning advisors of the Firm at least annually.

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

Where a client is introduced to Stavis Wealth by a third-party solicitor, Stavis Wealth can pay such solicitor a referral fee in accordance with the regulatory requirements. The Firm will only compensate such persons or entities for referrals of financial and estate planning clients, and all such referral or solicitor arrangements will be in accordance with applicable regulatory rules, which generally require a written agreement and certain related written documentation.

The Firm may act as a third-party solicitor for compensation where and when it refers investment business to another advisor. In certain cases, and fully disclosed

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to the client, the Firm may serve as a third-party solicitor and accept a solicitor's fee for referring a client to an investment manager.

**Item 15 – Custody**

Stavis Wealth does not take or hold actual or physical custody of any clients' assets or investments.

**Item 16 – Investment Discretion**

Stavis Wealth may receive discretionary authority from the client at the outset of an advisory relationship to identify the appropriate allocation of subaccounts/IDFs within the policy. However, such discretion is to be exercised in a manner consistent with the stated insurance company policies and client investment objectives. When selecting securities and determining amounts, Stavis Wealth observes the investment policies, limitations and restrictions of the client for which it advises.

Investment guidelines and restrictions should be provided in writing to Stavis Wealth by the client. The Firm has the authority to determine, without obtaining consent of the client before transactions are effected, both the subaccounts/IDFs, which are to be reallocated within the account. Limitations or restrictions on this authority would result if the client specified that certain investments were to be precluded or prohibited or otherwise restricted or limited.

**Item 17 – Voting Client Securities**

As a matter of firm policy, Stavis Wealth generally does not accept the authority to and does not generally vote proxies.

***Class Actions/Legal Proceedings***

Clients should note that Stavis Wealth will neither advise nor act on behalf of the investment advisor clients in legal proceedings involving companies whose securities are held or previously were held in the investment advisor's clients' account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. Unless directed otherwise in writing, Stavis Wealth will transmit, or forward copies of class action notices received to the client and/or a third-party advisor or representative as designated by the client. Stavis Wealth will also make commercially reasonable efforts to forward such notices in a timely manner.

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**Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about such advisory firm's financial condition where such financial condition would likely impair the advisory firm's ability to meet contractual and fiduciary commitments to its clients. Stavis Wealth has no such financial commitment or condition that impairs its ability to meet contractual and fiduciary commitments to its clients, and it has not been the subject of a bankruptcy proceeding. Also, the Firm does not require prepayment of more than \$1200 in fees per client for six months or more in advance.

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**ADV-PART 2B BROCHURE SUPPLEMENT (PART 2B)**  
**STAVIS WEALTH TRANSFER SOLUTIONS, LLC**  
**1330 Post Oak Blvd, Suite 2050**  
**Houston, TX 77056**

This Brochure Supplement provides information about advisors at Stavis Wealth Transfer Solutions (“Stavis Wealth”) and is a supplement to the Stavis Wealth ADV-Part 2 Disclosure Brochure (Part 2A above). Additional information about our advisors is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

LISTING OF ADVISORS COVERED IN THIS BROCHURE SUPPLEMENT

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**DEBORAH M. STAVIS**  
**KAYLA TOLUNAY**

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**PART 2B – BROCHURE SUPPLEMENT****DEBORAH M. STAVIS, CFP® - MANAGING PRINCIPAL/CHIEF EXECUTIVE OFFICER**

Year of Birth: 1955

**EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

## Post-Secondary Education:

Attended Wayne State University, 1974 – 1978, Communications

## Business Background:

- 2009-2023: Chief Executive Officer, Stavis & Cohen Private Wealth/CI Private Wealth
- 1996-2007: Chief Executive Officer, Stavis, Margolis Advisory Services, Inc.

*-History Back to 1980 is available upon request*

## Professional Designations Held:

Certified Financial Planner™, CFP® - Since 1987

## Licenses Held:

- Series 7 General Securities Representative
- Series 24 General Securities Principal
- Series 63 Uniform Securities Agent State Law
- Series 65 Uniform Registered Investment Adviser Law
- Group 1 Life and Health Insurance

*-For an explanation of qualifications required for any designations, please see Appendix A.***DISCIPLINARY INFORMATION**

Deborah M. Stavis has no legal or disciplinary events to report.

**OTHER BUSINESS ACTIVITIES**

Deborah M. Stavis is Managing Principal/CEO at Stavis Wealth but is also separately licensed as a Registered Representative with Purshe Kaplan Sterling Investments (PKS), a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). Deborah Stavis is also a licensed insurance agent. Please refer to the Other Business Activities section of the Stavis Wealth ADV-Part 2 Brochure for more information on this topic.

**ADDITIONAL COMPENSATION**

Deborah M. Stavis' primary source of income is derived from her activities conducted on behalf of the firm. Incidental sources derived from affiliates are minimal and disclosed on her Outside Business Activities form.

**SUPERVISION**

The Firm's Managing Principal is also the Firm's Chief Compliance Officer and is responsible for overseeing and enforcing the firm's compliance program that monitors and supervises the activities and services provided by the firm and its advisory representatives. Deborah Stavis can be contacted by email as listed above or at 713-391-8200.

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## PART 2B – BROCHURE SUPPLEMENT

### KAYLA TOLUNAY, CFP® - ADVANCED FINANCIAL AND ESTATE PLANNING ADVISOR

Year of Birth: 1987

### EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Post-Secondary Education:

Eckerd College, 2009, BS, Business Administration

#### Business Background:

- 2021-2023: Lead Advisor, Stavis & Cohen Private Wealth/CI Private Wealth
- 2017-2021: Advisor, Stavis & Cohen Financial/SCF Private Wealth Holdings
- 2009-2017: Planning Associate, Stavis & Cohen Financial
- 2007-2009: Statistics Tutor at Eckerd College

*-History Back to 2005 is available upon request*

#### Professional Designations Held:

Certified Financial Planner™, CFP® – Since 2014

#### Licenses Held:

- Series 7 General Securities Representative
- Series 63 Uniform Securities Agent State Law Examination

-For an explanation of qualifications required for any designations, please see Appendix A.

### DISCIPLINARY INFORMATION

Kayla Tolunay has no legal or disciplinary events to report.

### OTHER BUSINESS ACTIVITIES

Kayla Tolunay is a Financial Advisor with Stavis Wealth but is also separately licensed as a Registered Representative with Purshe Kaplan Sterling Investments (PKS), a registered securities broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investors Protection Corporation (SIPC). Please refer to the Other Business Activities section of the Stavis Wealth ADV-Part 2 Brochure for more information on this topic.

### ADDITIONAL COMPENSATION

Kayla Tolunay's sole source of investment related income is derived from her activities conducted on behalf of the firm.

### SUPERVISION

The Firm's Managing Principal and Chief Compliance Officer is responsible for overseeing and enforcing the firm's compliance program that monitors and supervises the activities and services provided by the firm and its advisory representatives. Supervisor D. Stavis can be contacted by email as listed above or at 713-391-8200.

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## (Appendix A – Professional Designations/Certifications Summary)

### CERTIFIED FINANCIAL PLANNER (CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and (since 2007) attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours

over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

**Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.