



## **Form ADV Part 2A Firm Brochure and Part 2B Brochure Supplement**

Sebold Capital Management, Inc.  
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*This brochure provides information about the qualifications and business practices of Sebold Capital Management, Inc. If you have any questions about the contents of this brochure, please contact us at: 630-548-9700, or by email at: [info@seboldcapital.com](mailto:info@seboldcapital.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 Sebold Capital Management, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

December 31, 2023

## *Item 2 – Material Changes*

Since the filing of the firm's last Brochure dated March 15, 2023, a Brochure supplement has been added for Nicholas W. Niemi while Christa J. Madison and Susan J. Templeton have been removed.

Pursuant to SEC Rules, Sebold Capital Management will ensure that clients receive a summary of any materials change to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided free of charge.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact Sebold Capital Management via telephone at: 630-548-9700 or via email at: [info@seboldcapital.com](mailto:info@seboldcapital.com).

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## ***Item 4 – Advisory Business***

### **Firm Description**

Sebold Capital Management, Inc. was founded in 1998 by Sean Sebold. As of 03/15/2024, there are eight employees, three have a Certified Financial Planner™ designee, two are an Investment Advisor, one is a Chartered Financial Analyst, and six administrative staff. The firm is federally registered with the SEC (Securities and Exchange Commission) as a Registered Investment Advisor. Registration for a Registered Investment Advisor does not imply a certain level of skill or training.

Sebold Capital Management provides personal financial planning and investment management to individuals, families, and their related entities, trusts and estates, and family businesses. Sebold Capital Management works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include identification of financial problems, cash flow and budget management, tax planning, risk exposure review, investment management, education funding, retirement planning, estate planning, charitable goals, special needs planning, family business succession issues, fringe benefits, and/or other issues specific to the client.

The firm's compensation is solely from fees paid directly by clients. The firm does not receive commission based on the client's purchase of any financial product, including insurance. No commissions in any form are accepted. No referral fees are paid or accepted. No benefits are received from custodians/broker-dealers based on client securities transactions ("soft dollar benefits").

Assets under the direct management of Sebold Capital Management are held by independent custodians, including Charles Schwab, Fidelity, Equity Trust, or others, in the client's name.

We may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

### **Principal Owners**

Sean Sebold is a 100% stockholder of Sebold Capital Management. There are no intermediate subsidiaries.

### **Types of Advisory Services**

Sebold Capital Management provides investment advisory services (i.e. "asset management") and furnishes investment advice, as part of an on-going financial planning relationship.

At Sebold Capital Management, advisory services are tailored to the individual needs of clients. Client goals and objectives are clarified in meetings and via correspondence and are used to determine the course of action for each individual client. The goals and objectives for each client are documented in our client relationship management system and in client files, either in hard copy or in electronic files. Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing and be signed by the client, Sebold Capital Management, and the separate account manager, if applicable. Agreements may not be assigned without client consent.

In performing its services, Sebold Capital Management is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Sebold Capital Management when there is any change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

### **Wealth Management**

This service includes financial planning, implementation, and ongoing asset management/monitoring. Wealth Management services may include identification of financial problems, cash flow and budget management, tax planning, risk exposure review, investment management, education funding, retirement planning, estate planning, charitable goals, small business planning issues, fringe benefits, special needs planning or other issues specific to the client. A written evaluation of the client's current situation and their goals is provided to the client. The engagement also includes implementation of recommendations accepted by client, telephone support, meetings as required, on-going financial planning services, reminders of the specific courses of action that need to be taken, and quarterly, semi-annual, or annual written portfolio reviews as conferred with each client. More frequent reviews may occur but are not necessarily communicated to the client unless immediate changes are recommended.

### **Investment Management**

Investment Management is the management of investment account(s) based on a written Investment Policy Statement [IPS] jointly agreed to by Sebold Capital and the client. This IPS is developed through meetings with the client while determining their investment philosophy, risk tolerance, goals and overall objectives. Investment Management clients are generally met with on an annual basis with statements being made available to them quarterly.

### **Business Succession Planning**

Business Succession Planning is a step-by-step process that allows business owners to take control of their succession strategies. This process allows the business owner to choose their departure date, the amount of money intended to be received from the sale or transfer of their companies and their successor choice.

### **Retirement Investment Consulting**

Retirement Investment Consulting develops and maintains an Investment Policy Statement for employer retirement plans like a 401(k). The IPS formalizes investment review guidelines. Retirement Investment Consulting Services provides initial and ongoing due diligence of the plan's securities. Reviews with the trustee or investment committee are scheduled according to the trustee. We assist in the plan design, but Sebold Capital Management does not provide Third Party Administrative (TPA) services. Sebold Capital Management will recommend the TPA but is hired by the plan's trustee.

### **Financial Planning**

Financial Planning is the process of determining whether and how an individual/family/entity can meet life goals through the proper management of financial resources. Financial planning may integrate subject areas including but not limited to financial statement analysis, insurance planning, employee benefits planning, tax planning, retirement planning, and estate planning. Financial planning clients will follow a step-by-step process to reach their goals.

### **Managed Assets**

As of December 31, 2023, Sebold Capital Management managed \$303,807,809 in assets for 813 accounts. \$233,073,769 managed on a discretionary basis and \$70,734,040 on a non-discretionary basis.

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

Sebold Capital Management bases its fees on a percentage of assets under management, hourly charges, fixed fees, and a retainer that is not calculated on assets under management basis or on an hourly estimate. Fees are not negotiable. In Illinois, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees.

### **Wealth Management**

Initial financial planning fees for the Wealth Management services is \$2,000. This is a one-time fee.

Wealth Management Fees are as follows:

\$0	-	\$ 1,000,000	1.25%
\$1,000,000	-	\$ 2,000,000	.85%
\$2,000,001	-	\$ 6,000,000	.65%
\$6,000,001	-	\$25,000,000	.55%
\$25,000,001	+		.50%

A detailed fee schedule showing calculations is provided with the quarterly invoice.

## **Investment Management**

Investment Management fees are as follows:

0	-	\$ 1,000,000	1.00%
\$ 1,000,001	-	\$ 2,000,000	.75%
\$ 2,000,001	-	\$10,000,000	.50%
\$10,000,001	+		.40%

There is a minimum quarterly billing of \$5,250 for both Wealth Management and Investment Management services, grandfathered provisions may apply.

## **Business Succession Planning**

Business Succession Planning fees are negotiated upfront and approved by the client prior to the engagement. They are based on complexity of the engagement and scope of services.

## **Retirement Investment Consulting**

Retirement Investment Consulting services are between .20% and 1.25% of the plan's assets depending on the size and complexity of the plan, in addition to the services required by the client.

## **Financial Planning**

Financial Planning fees are negotiated upfront and approved by the client prior to the engagement. They are based on complexity of the engagement and scope of services.

## **Billing**

Investment Management and Wealth Management services have fees deducted quarterly from a designated brokerage account at their qualified custodian. Billing is charged quarterly in advance based upon the value of the client's account on the last trading day of the previous quarter. Grandfathered clients may have a different fee structure.

Upon termination, Sebold Capital Management shall refund within 30 days the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

The client must consent in advance to direct debiting of their investment account for Wealth Management or Investment Management fees. For retainer-based projects clients are invoiced in advance.

Direct family members and employees of Sebold Capital may or may not be billed.

## **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, bonds, and exchange-traded funds. These transaction charges are usually relatively nominal and are incidental to the purchase or sale of a security. In some cases, custodians also charge monthly, quarterly, or

annual custody fees. Fees for custody are disclosed to clients when this type of arrangement is recommended.

Mutual funds and exchange traded funds generally charge a management fee for their services as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund prospectus. These fees are in addition to the fees paid by the client to Sebold Capital Management.

Please see the section entitled “Brokerage Practices” under Item 12 for more information.

### **Past due Accounts and Termination of Agreement**

Sebold Capital Management reserves the right to stop work on any account that is more than 60 days overdue. In addition, Sebold Capital Management reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per the judgment of Sebold Capital Management. Clients may terminate their agreement at any time by providing written notice.

### **Compensation for Sales of Investment Products**

The firm’s compensation is solely from fees paid directly by clients. The firm does not receive commission based on the client’s purchase of any financial product, including insurance.

## ***Item 6 – Performance-Based Fees***

Sebold Capital Management does not use a performance-based fee structure. The nature of asset-based fees allows Sebold Capital Management to participate in the growth of the client’s wealth. Conversely, this also means that our fees can decline when the client’s portfolio declines in value.

## ***Item 7 – Types of Clients***

Sebold Capital Management generally provides investment advice to high net-worth individuals, families, trusts, businesses, and estates. Advice may extend to entities related to the client such as small businesses and charitable organizations, including foundations and endowments. Client relationships vary in scope and length of service.

Sebold Capital Management does impose a minimum dollar fee structure or other conditions for opening or maintaining an account. The minimum quarterly billing fee is \$5,250. A typical annual fee for a couple with a \$5 million net worth and an investable portfolio of \$2 million would be \$21,000.



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

Security analysis methods at Sebold Capital Management include fundamental analysis. The main sources of information include Y-Charts, fund prospectuses, S&P reports, Argus reports, Thompson Reuters Stock Reports and other research providers, financial newspapers and magazines, research materials prepared by others, filings with the Securities and Exchange Commission, and annual reports. Employees of Sebold Capital Management also attend on- and off-site visits with fund and portfolio managers, conference calls, and industry conferences.

### **Investment Strategies**

The primary investment strategy we use for client accounts is strategic asset allocation. We may use passively-managed index and exchange-traded funds when appropriate for the client and actively-managed funds, dividend paying stocks, and individual municipal bonds where there are opportunities to make a difference by security selection. Portfolios are generally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives, income needs, and tax situation stated by the client during consultations. The client may change these objectives at any time after meeting with Sebold Capital Management.

The aggregation or blocking of client transactions allows Sebold Capital Management to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. Our firm's policy is to aggregate client transactions where possible and when advantageous to clients. In these instances, clients participating in any aggregated transactions will receive an average share price and transaction costs will be shared equally and on a pro-rata basis.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. However, as with all investments, clients face investment risks including the following: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk.

## ***Item 9 – Disciplinary Information***

Sebold Capital Management has not been the subject of any legal or disciplinary actions.

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

Neither Sebold Capital Management nor any of its management persons has (i) registered or begun registration to act as a broker-dealer or registered representative of a broker-dealer, or (ii) registered or begun registration to act as a future commission merchant, commodity pool operator, commodity trading advisor or an associated person of the forgoing entities.

Sebold Capital Management is not affiliated with a related persons who is a banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or any sponsor or syndicator of limited partnerships.

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

### **Code of Ethics**

The employees of Sebold Capital Management have committed to a Code of Ethics and Fiduciary Oath as outlined by the National Association of Personal Financial Advisors (NAPFA). The key points are: putting the clients' interest first, objectivity, confidentiality, competence, fairness and suitability, integrity and honesty, regulatory compliance, full disclosure, and professionalism. CFP® designees are also held to a Code of Ethics as outlined by the CFP® Board of Standards. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

Sebold Capital Management and its employees may at times buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Sebold Capital Management "Policies & Procedures Manual".

### **Personal Trading**

The Chief Compliance Officer of Sebold Capital Management is Sean Sebold. Sean Sebold reviews all employee transactions, at least quarterly. The personal trading reviews ensure that the personal trading of employees was not based on inside information and that clients of the firm receive preferential treatment.

## *Item 12 – Brokerage Practices*

### **Selecting Brokerage Firms**

Sebold Capital Management does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. Sebold Capital Management recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, and the quality of client service.

Sebold Capital Management recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab, Fidelity, Equity Trust, and others. Sebold Capital Management does not receive fees or commissions from any of these arrangements, although Sebold Capital Management may benefit from electronic delivery of client information, electronic trading platforms and other services provided by custodians for the benefit of clients. Sebold Capital Management may also benefit from other services provided by custodians:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support, such as research, continuing education, and practice management advice.

These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions.

Sebold Capital Management seeks to use a custodian that will hold client assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (*generally without a separate fee for custody*)
- Capability to execute, clear, and settle trades (*buy and sell securities for your account*)
- Capability to facilitate transfers and payments to and from accounts (*wire transfers, check requests, bill payment, etc.*)
- Breadth of available investment products (*stocks, bonds, mutual funds, exchange-traded funds, etc.*)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (*commission rates, margin interest rates, other fees, etc.*) and willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Prior service to us and our clients

Sebold Capital Management reviews the execution of trades at each custodian, at least annually. Trading fees charged by the custodians are also reviewed on an annual basis. Sebold Capital Management does not receive any portion of the trading fees.

### **Soft Dollars**

Sebold Capital Management, Inc., as a matter of policy and practice, does not have any formal or informal arrangements or commitments to utilize research, research-related products and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis.

### **Directed Brokerage**

Sebold Capital Management, Inc.'s policy and practice are to not accept advisory clients' instructions for directing a client's brokerage transactions to a particular broker-dealer.

## ***Item 13 – Review of Accounts***

### **Periodic Reviews**

The frequency of reviews is individually conveyed with each client. Wealth Management clients are provided with quarterly, semi-annual, or annual reviews, which vary in focus by quarter and may include asset allocation updates and rebalancing, performance reviews, tax and estate plan reviews, investment reviews, cash flow monitoring, and more.

Account reviews are performed by Sebold Capital advisors. All investment plans are reviewed by Sean Sebold prior to distribution to clients. The number of households for which each reviewer is responsible varies.

### **Review Triggers**

Account reviews for Wealth Management clients are performed more frequently when market conditions dictate, or when a client's objectives change. A review may be triggered by client request, changes in market condition, new information about an investment, changes in tax laws, or other important changes.

### **Regular Reports**

Written reports are given to clients either in a printed or electronic format on a quarterly basis. The reports may consist of an individualized letter summarizing the results of the review and our general thoughts on the economy, a statement of holdings from our portfolio accounting software or other such portfolio reports, asset allocation analysis, tax-related information, updates to financial plan reports, portfolio graphs, or other reports as needed.

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

### **Incoming Referrals**

Sebold Capital Management has been fortunate to receive many client referrals over the years. The referrals have come from clients, attorneys, accountants, employees, personal friends of employees, and other sources. The firm does not pay for referrals.

### **Referrals to Other Professionals**

Sebold Capital Management does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## *Item 15 – Custody*

Sebold Capital Management, Inc. does maintain custody of advisory client funds, securities, or assets. The custody rule under the Investment Advisers Act of 1940 defines custody as "holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them." Sebold Capital Management shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis.

As an advisor with custody, Sebold Capital Management, Inc.'s general policy is to ensure that we maintain client funds and securities with "qualified custodians" which provide at least quarterly account statements directly to our clients or a selected "independent representative." Clients are at times provided account statements, net worth statements, and net worth graphs that are generated from our portfolio accounting and financial planning software. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land, real estate, limited partnerships, and other hard-to-price assets. The book values of hard to price assets are reviewed whenever supplemental information relating to valuation is received. Otherwise, these assets are priced at client cost. Clients are urged to compare the statements they receive from Sebold Capital Management to those they receive from their qualified custodians. Clients are encouraged to raise any questions about the custody, safety or security of their assets and our custodial recommendations.

As an advisor with custody on certain accounts, Sebold Capital Management is required to obtain a surprise annual examination of client assets by an independent public accountant. The independent accountant must file its surprise examination report with the SEC within 120 days of the commencement of the examination. Any material discrepancies found by the accountant must be reported to the SEC within one day.

The SEC issued a no-action letter (“Letter”) with respect to the Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). The letter provided guidance on the Custody Rule as well as clarified that an advisor who has the power to disburse client funds to a third party under a standing letter of authorization (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment advisor, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- The investment advisor has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
- The investment advisor maintains records showing that the third party is not a related party of the investment advisor or located at the same address as the investment advisor.
- The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

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

### **Discretionary Authority for Trading**

Sebold Capital Management accepts discretionary authority to manage securities accounts on behalf of clients. Sebold Capital Management has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in clients’ accounts on their behalf so that we may promptly implement the investment policy that they have approved.

### **Limited Power of Attorney**

Clients must sign a limited power of attorney before Sebold Capital Management is given discretionary authority. The limited power of attorney is included in the qualified custodian’s account application for our main custodians. For accounts not held with our main custodians, clients may sign a separate limited power of attorney document giving discretionary authority to Sebold Capital Management.

## *Item 17 – Voting Client Securities*

Unless the client designates otherwise, Sebold Capital Management votes proxies as a matter of policy and as a fiduciary to our clients. Sebold Capital Management has responsibility for voting proxies for portfolio securities consistent with the best economic interests of clients. We have adopted Proxy Voting Policies pursuant to SEC Rule 206(4)-6.

Sebold Capital Management's policy is to vote all proxies from a specific issuer the same way for each client absent qualifying restrictions from a client. Clients are permitted to place reasonable restrictions on Sebold Capital Management's voting authority in the same manner that they may place such restrictions on the actual selection of account securities. Sebold Capital Management will generally vote in favor of routine corporate housekeeping proposals such as the election of directors and selection of auditors absent conflicts of interest raised by an auditors' non-audit services. Sebold Capital Management will generally vote against proposals that cause board members to become entrenched or cause unequal voting rights; and in reviewing proposals, Sebold Capital Management will further consider the opinion of management and the effect on management, and the effect on shareholder value and the issuer's business practices.

### **Conflicts of Interest**

Sebold Capital Management will conduct quarterly reviews to identify any conflicts that exist between the interests of the advisor and the client by reviewing the relationship of the firm with the issuer of each security to determine if Sebold Capital Management or any of its employees has any financial, business, or personal relationship with the issuer. If a material conflict of interest exists, Sebold Capital Management will determine whether it is appropriate to disclose the conflict to the affected clients, to give the clients an opportunity to vote the proxies themselves, or to address the voting issue through other objective means such as voting in a manner consistent with a predetermined voting policy or receiving an independent third party voting recommendation; and Sebold Capital Management will maintain a record of the voting resolution of any conflict of interest.

Clients may direct a proxy vote at any time by calling or writing to us to inform us of their desired vote. A copy of Sebold Capital Management's proxy voting policy is available upon request.

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

### **Financial Condition**

Sebold Capital Management does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

The firm does not require prepayment of client fees of more than \$1,200 per client, six months or more in advance.

Sebold Capital Management has not been the subject of a bankruptcy petition.

### **Business Continuity Plan**

Sebold Capital Management has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people.

## ***Item 19 – Requirements for State-Registered Advisers***

Not Applicable





## **Part 2B Brochure Supplement**

Sean T. Sebold  
President and Chief Compliance Officer

Sebold Capital Management, Inc.  
2443 Warrenville Rd., Suite 150  
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*The brochure supplement provides information about Sean Sebold that supplements the Sebold Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact us at: 630-548-9700, or by email at: [info@seboldcapital.com](mailto:info@seboldcapital.com) if you did not receive Sebold Capital Management's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Sean Sebold is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

## **Sean T. Sebold**

Sebold Capital Management, Inc.  
2443 Warrenville Rd., Suite 150 | Lisle, IL 60532  
630-548-9700 | www.seboldcapital.com

### **Item 2 - Educational Background and Business Experience**

Sean T. Sebold, CFP®, CFA, President, Chief Compliance Officer

Born: 1966

#### **Educational Background:**

- Villanova University, BA, 1988
- College of Financial Planning, CFP®, 1996
- Northwestern University, Kellogg School of Management, MBA, 2000
- CFA Institute, Chartered Financial Analyst, 2002

#### **Business Experience:**

04/1998 to present - Sebold Capital Management President

**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.

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

- Education – The two-part education requirement includes both (1) completing coursework on financial planning through a CFP Board Registered Program, and (2) holding a bachelor's degree or higher (in any discipline) from an accredited college or university.
- Examination – The CFP® exam is a 170-question, multiple-choice test that consists of two 3-hour sessions over one day. The exam includes stand-alone and scenario-based questions, as well as questions associated with case studies.
- Experience – Complete either 6,000 hours of professional experience related to the financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- 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 (CE) each reporting period: 2 hours of CFP Board Ethics CE, and 28 hours of CE covering one or more of CFP Board's Principal Topics.
- 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.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

A **Chartered Financial Analyst (CFA®)** charter is a designation given to those who have completed the CFA® Program and completed acceptable work experience requirements. A CFA is a globally-recognized professional designation given by the CFA Institute, (formerly the AIMR (Association for Investment Management and Research)), that measures and certifies the competence and integrity of financial analysts. The CFA charter is one of the most respected designations in finance and is widely considered to be the gold standard in the field of investment analysis.

The Mission and Vision of the CFA Institute is: To lead the investment profession globally by promoting the highest standards of ethics, education and professional excellence for the ultimate benefit of society.

To become a CFA Chartholder, an individual must satisfactorily fulfill the following requirements:

- Education – Completed a bachelor's program or equivalent program and have received a degree from the college/university.
- Examination – The CFA Program is a three-part exam that tests the fundamentals of investment tools, valuing assets, portfolio management, and wealth planning. Passing the exam for all three levels, along with the applicable practical skills modules, is a requirement to obtain the CFA charter. CFA Institute requires that every CFA Program candidate have a valid international travel passport. Exams require English proficiency for reading comprehension and formulating answers to complex financial scenarios.
- Professional Experience – Have at least 4,000 hours of work experience, completed in a minimum of 36 months. Qualified hours must be directly related to the investment decision-making process or producing a work product that informs or adds value to that process. Experience earned through full-time, part-time, or remote work arrangements – before, during, or after participation in the CFA program – can qualify.

Individuals who become CFA certified must complete the following ongoing education:

- CFA Institute recommends that members complete a minimum of 20 Continuing Education (CE) credits each calendar year.

### **Item 3 - Disciplinary Information:**

Sean Sebold has not been the subject of any legal or disciplinary actions.

### **Item 4 - Other Business Activities**

Sean Sebold: (i) is not actively engaged in any investment-related business or activity not associated with the services of Sebold Capital Management, and (ii) is not registered nor has begun registration to act as a broker-dealer, a registered representative of a broker-dealer, a future commission merchant, a commodity pool operator, a commodity trading advisor or an associated person of the forgoing entities, and (iii) is not in any relationship that creates a material conflict between himself and the clients of Sebold Capital Management, and (iv) does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service fees from the sale of mutual

funds, and (v) is not actively engaged in any business or occupation for compensation not stated in this Item 4.

**Item 5 - Additional Compensation**

Other than compensation and bonuses provided by Sebold Capital Management for services rendered in the roles of President and Advisor at Sebold Capital Management, Sean Sebold does not receive any economic benefit by any person who is not a client of Sebold Capital Management.

**Item 6 - Supervision**

Investment advice given to clients is monitored through the use of Investment Policy Statements and Risk Evaluation Questionnaires given to clients. The Chief Compliance Officer reviews Investment Policy Statements that guide our investment strategy decisions with clients. The Supervisor is Sean Sebold, President, Sebold Capital Management, 630-548-9700.

**Item 7 – Requirements for State-Registered Advisers**

N/A



## **Part 2B Brochure Supplement**

Nicholas W. Niemi  
Associate Financial Advisor

Sebold Capital Management, Inc.  
2443 Warrenville Rd., Suite 150  
Lisle, IL 60532  
630-548-9700  
[www.seboldcapital.com](http://www.seboldcapital.com)

*The brochure supplement provides information about Nicholas Niemi that supplements the Sebold Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact us at: 630-548-9700, or by email at: [info@seboldcapital.com](mailto:info@seboldcapital.com) if you did not receive Sebold Capital Management's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Sean Sebold is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

### **Nicholas W. Niemi**

Sebold Capital Management, Inc.

2443 Warrenville Rd., Suite 150 | Lisle, IL 60532

630-548-9700 | [www.seboldcapital.com](http://www.seboldcapital.com)

## **Item 2 - Educational Background and Business Experience**

Nicholas W. Niemi, CFP®, CPWA®, CEPA®, Associate Financial Advisor

Born: 1991

### **Educational Background:**

- Northern Illinois University, BA, 2013
- College of Financial Planning, CFP®, 2021
- Investments & Wealth Institute, Yale School of Business, CPWA®, 2023
- Exit Planning Institute, CEPA® 2023

### **Business Experience:**

02/2023 to present - Sebold Capital Management

12/2017 – 02/2023 - Merrill Lynch Wealth Management

**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.

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

- Education – The two-part education requirement includes both (1) completing coursework on financial planning through a CFP Board Registered Program, and (2) holding a bachelor's degree or higher (in any discipline) from an accredited college or university.
- Examination – The CFP® exam is a 170-question, multiple-choice test that consists of two 3-hour sessions over one day. The exam includes stand-alone and scenario-based questions, as well as questions associated with case studies.
- Experience – Complete either 6,000 hours of professional experience related to the financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- 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 (CE) each reporting period: 2 hours of CFP Board Ethics CE, and 28 hours of CE covering one or more of CFP Board’s Principal Topics.
- 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.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**CERTIFIED PRIVATE WEALTH ADVISOR®, CPWA®** is a certification issued by the Investments & Wealth Institute. The CPWA® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CPWA® certification.

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

- Education – Bachelor's degree from an accredited college or university, or any one of the following licenses: CIMA®, CIMC®, CFA, CFP®, ChFC®, ChC, or CPA license. CPWA® candidates must complete 6 months of a comprehensive program of study, which includes a combination of self-study and interactive instruction. The curriculum covers investments and asset allocation, tax planning strategies for high-net-worth families, estate planning strategies, financial planning processes, and practice management. The training program can be obtained through the IMCA’s approved course providers, the University of Chicago Booth School of Business or the Yale School of Management, or through their investment firm.
- Examination – The CPWA® designation requires candidates to pass an examination that consists of 135 multiple-choice questions, 10 of which are beta. The exam covers various topics, including investments, risk management, and estate planning for high-net-worth individuals. The CPWA® exam structure is composed of four sections: Human Dynamics, Wealth Management-Technical Design, Legacy Issues, and Specialty Client Services. Each section contains questions ranging from easy to difficult, with all questions rated on a scale of 1-5 points depending on complexity. Candidates will have four hours to finish the exam. The exam does not have a predefined passing score. The Modified Angoff Scoring Method is used to grade the exam. The pass percentage is determined by the complexity of the exam received.
- Experience – 5 years of client-centered professional experience in financial services or a comparable industry.
- Ethics – A good record of ethical behavior, as established by the Admissions Committee of IMCA

Individuals who become certified must complete the following ongoing education requirements to maintain the right to continue to use the CPWA® marks:

- Continuing Education – Complete 40 hours of continuing education hours, two of which must be ethics credits, every two years. Failure to meet the renewal requirements will result in loss of the right to use the CPWA® marks.

**CERTIFIED EXIT PLANNING ADVISOR®, CEPA®** is a certification issued by the Exit Planning Institute. The CEPA® credential has been approved/recognized by over 40 organizations and institutions nationwide. A voluntary certification: no federal or state law or regulation requires financial planners to hold CEPA® certification.

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

- Education – Have an undergraduate degree from a qualifying institution or additional professional work experience (two years of relevant professional experience may be substituted for each year of required undergraduate studies); have five years of full-time or equivalent experience working directly with business owners as a financial advisor, attorney, CPA, business broker, investment banker, commercial lender, estate planner, insurance professional, business consultant or in a related capacity; and be an Exit Planning Institute member in good standing.
- Examination – The CPWA® designation requires candidates to pass an examination that consists of an online, proctored, closed book final exam.
- Experience – Have five years of full-time or equivalent experience working directly with business owners as a financial advisor, attorney, CPA, business broker, investment banker, commercial lender, estate planner, insurance professional, business consultant or in a related capacity.

Individuals who become certified must complete the following ongoing education requirements to maintain the right to continue to use the CPWA® marks:

- Continuing Education – Complete 40 hours of continuing education hours every three years.

### **Item 3 – Disciplinary Information:**

Nicholas Niemi has not been the subject of any legal or disciplinary actions.

### **Item 4 - Other Business Activities**

Nicholas Niemi: (i) is not actively engaged in any investment-related business or activity not associated with the services of Sebold Capital Management, and (ii) is not registered nor has begun registration to act as a broker-dealer, a registered representative of a broker-dealer, a future commission merchant, a commodity pool operator, a commodity trading advisor or an associated person of the forgoing entities, and (iii) is not in any relationship that creates a material conflict between himself and the clients of Sebold Capital Management, and (iv) does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service fees from the sale of mutual funds, and (v) is not actively engaged in any business or occupation for compensation not stated in this Item 4.



**Item 5 - Additional Compensation**

Other than compensation and bonuses provided by Sebold Capital Management for services rendered at Sebold Capital Management, Nicholas Niemi does not receive any economic benefit by any person who is not a client of Sebold Capital Management.

**Item 6 - Supervision**

Investment advice given to clients is monitored through the use of Investment Policy Statements and Risk Evaluation Questionnaires given to clients. The Chief Compliance Officer reviews Investment Policy Statements that guide our investment strategy decisions with clients. The Supervisor is Sean Sebold, President, Sebold Capital Management, 630-548-9700.

**Item 7 – Requirements for State-Registered Advisers**

N/A