

**Item 1: Cover Page**



# BLUE SPARK CAPITAL ADVISORS

Blue Spark Capital Advisors LLC

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Form ADV Part 2A

March 22, 2024

This brochure provides information about the qualifications and business practices of Blue Spark Capital Advisors. If you have any questions about the contents of this brochure, please contact us on (212) 537- 3899 or by email at [postoffice@bluesparkfinancial.com](mailto:postoffice@bluesparkfinancial.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about Blue Spark Capital Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

While the firm and its associates may be registered with the SEC, that registration does not imply an endorsement by the SEC, nor imply a certain level of skill or training.

## **Item 2 --- Material Changes**

### **Material Changes Since Last Update**

Material changes relate to Blue Spark Capital Advisors' policies, practices, or conflicts of interests.

Since the last annual filing of Blue Spark Capital Advisors on March 31, 2023, the following material changes have been made:

- Schwab as new custodian after merger with TD Ameritrade.

### **Full Brochure Available**

For a copy of our Firm Brochure, please contact us by telephone on (212) 537-3899 or by email at [postoffice@bluesparkfinancial.com](mailto:postoffice@bluesparkfinancial.com).

## **Item 3 – Table of Contents**

<b>Item 1: Cover Page</b> .....	<b>1</b>
<b>Item 2 -- Material Changes</b> .....	<b>2</b>
Material Changes Since Last Update .....	2
Full Brochure Available .....	2
<b>Item 3 – Table of Contents</b> .....	<b>3</b>
<b>Item 4 -- Advisory Business</b> .....	<b>5</b>
<b>About Our Firm</b> .....	<b>5</b>
Our Mission .....	5
Fundamental Principles.....	5
<b>Principal Owners</b> .....	<b>6</b>
<b>Types of Advisory Services</b> .....	<b>6</b>
Investment Supervisory Services .....	6
Financial Planning Services .....	6
<b>General Information</b> .....	<b>8</b>
<b>Item 5 -- Fees and Compensation</b> .....	<b>8</b>
<b>Types of Fees</b> .....	<b>8</b>
Asset-Based Fees .....	8
Hourly and Project-Based Fees .....	8
<b>Fee Billing</b> .....	<b>8</b>
Asset-Based Fees .....	8
Project-Based Fees .....	9
<b>Other Fees</b> .....	<b>9</b>
<b>Prepayment of Fees</b> .....	<b>9</b>
<b>No Commissions</b> .....	<b>9</b>
<b>Termination of Services</b> .....	<b>9</b>
<b>Item 6 – No Performance-Based Fees or Side-By-Side Management</b> .....	<b>10</b>
<b>Item 7 -- Types of Clients</b> .....	<b>10</b>
<b>Item 8 -- Methods of Analysis, Investment Strategies, and Risk of Loss</b> .....	<b>10</b>
<b>Methods of Analysis</b> .....	<b>10</b>
<b>Investment Strategies</b> .....	<b>10</b>
<b>Potential Risk of Loss</b> .....	<b>11</b>
Investment Risks .....	11
<b>Item 9 -- Disciplinary Information</b> .....	<b>11</b>
<b>Item 10 -- Other Financial Industry Activities and Affiliations</b> .....	<b>11</b>
<b>Item 11 -- Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> 12	
<b>Code of Ethics</b> .....	<b>12</b>
<b>Privacy Policy Statement</b> .....	<b>12</b>
<b>Investment Recommendations Involving a Material Financial Interest</b> .....	<b>13</b>
<b>Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest</b> .....	<b>13</b>

<b>Item 12 -- Brokerage Practices .....</b>	<b>13</b>
<b>Selecting Service Providers .....</b>	<b>13</b>
<b>Best Execution .....</b>	<b>15</b>
<b>Directed Brokerage.....</b>	<b>15</b>
<b>Aggregating Securities Transactions.....</b>	<b>15</b>
<b>Trade Errors .....</b>	<b>16</b>
<b>Item 13 -- Review of Accounts .....</b>	<b>16</b>
<b>Reviews .....</b>	<b>16</b>
Investment Supervisory Services .....	16
Financial Planning Services.....	16
<b>Reports and Frequency .....</b>	<b>16</b>
<b>Item 14 -- Client Referrals and Other Compensation .....</b>	<b>16</b>
<b>Client Referrals .....</b>	<b>16</b>
<b>Item 15 -- Custody .....</b>	<b>17</b>
<b>Item 16 -- Investment Discretion .....</b>	<b>17</b>
<b>Item 17 -- Voting Client Securities .....</b>	<b>17</b>
<b>Item 18 -- Financial Information .....</b>	<b>17</b>
<b>Balance Sheet .....</b>	<b>17</b>
<b>No Financial Conditions Likely to Impair Ability to Meet Commitments to Clients .....</b>	<b>17</b>

**Important Note:** Throughout this document, Blue Spark Capital Advisors LLC may be referred to by the following terms: “Blue Spark”, “the firm,” “we,” “us,” or “our.” The client or prospective client may be referred to as: “client” “you,” “your,” etc. This brochure contains 20 pages and should not be considered complete without all pages.

## **Item 4 -- Advisory Business**

### **About Our Firm**

Blue Spark Capital Advisors is a fiduciary fee-only wealth management firm based in New York City, with offices in the Berkshires of Massachusetts. We specialize in the needs of women and their families after divorce, death of a spouse or parent, or other life transition such as retirement or job change. We provide holistic and objective financial advice to women and their families. We consider all of our clients' investment and life goals as a whole, offering investment management combined with comprehensive financial planning.

As of March 8, 2024, Blue Spark managed **\$208,266,939** in discretionary assets under management (AUM). We have been in business since April 2012 and have offices in Hudson Yards in New York City, and in Great Barrington, Massachusetts. The firm is registered as an investment advisor with the United States Securities and Exchange Commission.

### **Our Mission**

At Blue Spark Capital Advisors, we believe in a holistic approach. We aim to simplify your financial life, optimize your investments, and organize your personal financial planning. We work individually with you, to help develop a tailored plan that is right for your particular circumstances to help you achieve your most important financial goals. Movement in each piece of your financial plan can impact the other pieces, so we consider all your goals as a whole. For example, your retirement strategies can impact your college savings for your children as well as your estate planning goals. We believe that the appropriate allocation of investments for your objectives and risk tolerance – and the time frame for when you need your money – are some of the most important components in developing an investment portfolio. **Through a well-planned, diversified approach to wealth building, we aim to give you peace of mind, freedom, and security.**

### **Fundamental Principles**

We advocate a measured and prudent strategy, a balancing of risk and return that is appropriate for your particular situation. Our investment philosophy centers on the fact that markets do not always rise, nor do they fall forever. We do not chase the highest returns nor do we aim to catch the top or the bottom of the market. We generally use a combination of low-cost ETFs and a select group of actively and passively managed mutual funds.

Using an institutional method of "liability-driven investing" and broad diversification, **we guide our clients to invest according to their *specific time frame*** – when they need to use the assets. That then drives investment choices. We fully customize portfolios based on each client's needs. **We work with your accountant to overlay those investments to achieve optimal tax management, because the bottom line is what you keep. That helps our clients sleep at night.**

We keep in mind certain principles when designing an investment portfolio. The purpose is usually to fund current and future financial objectives, so your portfolio must take into account your goals, tolerance for risk, need for current income or liquidity, and many other considerations such as income and estate taxes. A main objective is to reduce risk through matching your liabilities – your expenses – with the appropriate investments.

It's important to remember that no one can predict the future. In fact, it's the difference of opinion that makes a market. Investment and economic experts, each one provided with the same information, often come to different conclusions. We look at decades of market data, Nobel-Prize-winning academic and company research, and the latest discoveries in behavioral finance. We do not suggest that we, nor any of the asset managers that we recommend, will make the correct decision every time. We do believe that studying the historic trends and relationships of investment classes can provide valuable insight.

To achieve diversification that reduces risk, we recommend allocating assets among stocks, bonds, and real estate, commodities, and other publicly traded alternative investments, as well as cash on occasion. Stocks are diversified further among different sized companies, and among U.S. and international, in both developed and developing economies. We follow a disciplined strategy through both the ups and downs of the financial markets. Many studies have shown that trying to "time" the market by chasing yield or running from losses is not beneficial over the long run.

**We hold ourselves to the fiduciary standard**, which means our firm and its associates act in the utmost good faith in what we believe is in the best interest of our clients. As fiduciary investment advisors, we are required to put you – our client – first.

### **Principal Owners**

Maura Griffin, CEO, Founder, and Principal, is 100% owner of Blue Spark Capital Advisors. Ms. Griffin is also the firm's managing member, Chief Compliance Officer, and designated principal (supervisor).

### **Types of Advisory Services**

Blue Spark Capital Advisors provides investment management combined with financial planning services.

#### **Investment Management Services**

We begin our relationship with a Discovery Meeting to learn more about you. We ask questions about your goals, your family, your history with money, current situation, and your worries and concerns. We do this to help you plot out timelines for your goals and discuss how best to get there. We provide our Investment Management Services on a discretionary basis, under a discretionary authority agreement (defined in Item 16), which means we select your investments and execute trades in your account that we believe are right for you based on our mutually agreed upon Investment Policy Statement and our discussions of your goals and a variety of other factors including your specific objectives and market conditions. Our investment management services include the following:

- Investment strategy,
- Holistic financial planning,
- Asset allocation,
- Investment selection,
- Asset location for tax efficiency,
- Regular and continuous portfolio monitoring.

We help prepare an Investment Policy Statement to reflect your investment objectives, time horizon, tolerance for risk, as well as any constraints or restrictions involving certain types of securities. The Investment Policy Statement is designed to be specific enough to provide future guidance while

concurrently allowing flexibility to respond to changing market conditions.

### **Financial Planning Services**

We believe that solid planning is imperative for a successful financial future and that planning should drive the selection, allocation, and class of investments chosen for each Client. For this reason, detailed financial planning is included in the services we provide to all of our investment management clients. We provide advice on cash flow analysis, retirement income needs, education funding, risk management, estate planning, maintaining adequate insurance, or other specific financial-related issues as you may request. We help position portfolios, for growth and income and maximum tax efficiencies; and we determine optimal cash flow strategies with methods for savings, debt reduction, and retirement income. We provide written recommendations and deliverables specified in our Agreement. We do not offer stand-alone financial planning engagements.

We offer our services for people in situations such as:

- “ **Newly Single or in Transition** – Managing your finances after a major emotional life change, such as divorce or losing a spouse or parent, can be overwhelming. We can help you sort out your financial life during difficult emotional times. We aim to educate about personal finance topics as well as help you explore the many details of planning, investing, tax implications and personal finance.
- “ **Nearing Retirement** – It takes significant planning to arrange your finances so you can retire when you want, with the lifestyle you want. We analyze issues such as the earliest age you can retire and the maximum you can spend without outliving your assets. We prefer the term “financial independence” over “retirement” because it’s often not a full-stop to work but a transition to a different kind of work. We provide a roadmap for those in retirement and those planning to retire.
- “ **Seeking Retirement Income** – After you have accumulated enough assets to comfortably leave your primary career behind, you may need help in turning those assets into a recurring revenue stream. It can be a puzzle to determine strategies for tax efficiencies in the drawdown phases. You may want help in determining how much you can comfortably spend, and which accounts to tap into first. We can calculate a plan for a sustainable withdrawal schedule and that will put you on the path to enjoying your life.
- “ **Investment Risk-Averse** – We craft a portfolio so you do not take any more risk than is necessary to reach your goals, nor be too safe and risk running out of money. This is often based on *when* you need your money for different goals, and matching the timing of those liabilities with the appropriate investments.
- “ **Income & Property Preservation** – We help determine whether you have adequate insurance in case of death or incapacity, to protect your property from a catastrophe, protect against lawsuits, and provide for long-term care expenses. *We do not sell insurance products.*
- “ **Planning for Your Estate & Legacy** – We help ensure that you are able to provide for your heirs and charities and make it easier for them to sort out your affairs after you’re gone. With advance planning, we can help reduce amounts subject to estate taxes and advise on the

correct legal structures to efficiently distribute your assets. We work hand-in-hand with your lawyers and CPAs.

- **College** – Many of our clients are focused on funding high school and college for their children or grandchildren, beginning either at birth or later on. Choosing the right vehicle for savings is important from a tax standpoint. We can answer many of your college-related financial planning questions.

### **General Information**

Blue Spark Capital Advisors tailors its services to the needs of each individual client. We provide our investment services on a discretionary basis; however, you can impose restrictions on what to invest in or what not to invest in. We do not offer any investment programs involving wrap fees.

Our firm does not provide legal or accounting services, but with your consent we work closely with your accountants, lawyers, real estate agents, and other advisors to coordinate and implement your strategies.

Our firm uses its best judgment and good faith effort in rendering its services. However, Blue Spark Capital Advisors cannot warrant or guarantee any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

## **Item 5 -- Fees and Compensation**

### **Types of Fees**

#### **Asset-Based Fees**

For our investment management engagements, our fees are based on a tiered, annualized percentage of assets under management. Fees will be billed quarterly, in arrears, based on the average daily balance of the accounts.

We have a minimum account size of \$1 million for new clients. Our fees are as follows:

<b>Assets Under Management</b>	<b>Annual Asset-Based Fee</b>
\$0,000 - \$999,999	1.25% or 125 Basis Points
\$1,000,000 - \$1,999,999	0.95% or 95 Basis Points
\$2,000,000 - \$4,999,999	0.89% or 89 Basis Points
\$5,000,000 - \$9,999,999	0.75% or 75 Basis Points
\$10,000,000 and up	0.50% or 50 Basis Points

For the benefit of discounting our fee, we may aggregate accounts for the same individual or two or more accounts within the same family or household, or accounts where a family member has power of attorney over another family member's or incompetent person's account. However, if investment objectives are substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we reserve the right to apply our fee schedule separately to each account.

For all forms of engagement noted in earlier paragraphs, the services we provide to you and the fee charged will be detailed specifically in a written agreement with you. Those outlined in the agreement are



the only fees Blue Spark charges; we have no hidden or surprise fees. Our fees may be negotiable, solely at the discretion of the firm principal.

### **Fee Billing**

#### **Asset-Based Fees**

Our asset-based fees for investment management services are billed quarterly, in arrears, based on the average daily balance in a client's account in the previous quarter. A client's first billing cycle will occur at the end of the quarter in which the accounts are funded. Clients authorize us to deduct our fees automatically from their accounts held at the third-party custodian. All fees deducted will be noted on the custodian's statements.

#### **Other Fees**

In addition to our investment management fees, clients may pay fees to third-party service providers, such as custodians' nominal brokerage fees, fees related to qualified retirement plan account terminations, or for holding alternative assets. Those fees are typically disclosed in a separate fee schedule, which you will receive from the service provider. Note that fees you pay to our firm for our services are separate from transactional fees such as charges for trades by the custodian or expenses charged separately by funds. Further information about our brokerage practices is noted in Item 12 of this document.

#### **Prepayment of Fees**

Our investment management fees are based on the previous quarter, so there is no prepayment of fees.

#### **No Commissions**

Our firm and its associates are compensated only by a fee for our wisdom, advice, and services. We do not accept commissions for product sales nor charge mark-ups on securities transactions; our associates do not accept any commissions on purchase of securities investments that we recommend.

As we describe above, you may pay fees to issuers of securities or mutual fund companies, which are detailed in prospectuses or product descriptions for these investments. It is an important part of our philosophy that we do not receive any other commissions or compensation, including "12b-1 fees," from any investments in issuers or mutual funds that we recommend. **We believe this practice aligns our interests with yours, as we are able to recommend and purchase investments that we believe are best for you.**

We offer what we think are the best mutual funds and other securities that have no or low sales fees. We research to find investment vehicles with high-quality management and low expense ratios.

### **Item 6 – No Performance-Based Fees or Side-By-Side Management**

We do not accept performance-based fees, i.e., fees based on a share of gains or capital appreciation of any portion of managed funds. We believe that performance-based compensation creates an incentive for a firm to recommend investments that may carry a higher degree of risk.

Our fees are also not based on "side-by-side" management, which refers to when a firm simultaneously

manages accounts that do pay performance-based fees and those that do not.

These types of arrangements, and the conflicts of interest they may pose, do not conform to our firm's philosophy and practices.

### **Item 7 -- Types of Clients**

We provide our services to individuals, businesses, as well as foundations and charities; we assist them in meeting their financial objectives in what we believe to be a cost-effective way. We have a particular specialty in working with women facing life transitions. We reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

#### **Methods of Analysis**

When engaged to provide investment advice, we first gather and consider information regarding several factors, including your:

- Current financial situation,
- Short-term and long-term needs,
- Investment goals and objectives,
- Level of investment knowledge,
- Socially responsible investing concerns or other reasonable restrictions, and
- Tolerance for risk.

Typically, we employ a fundamental analysis to develop our investment strategies. This includes evaluating economic factors such as interest rates, state of the economy, future growth of an issuer or sector, among others. In addition to our own research, our recommendations may also be drawn from research sources that include financial publications, investment analysis and reporting software, materials from outside sources, annual reports, prospectuses and other regulatory filings, and company information. We create asset allocation and investment policy strategies based on these and other factors of your own situation.

#### **Investment Strategies**

Our investment advice is based on global diversification with a long-term disciplined approach that manages risk through appropriate asset allocation. We aim to create portfolios that are highly diversified and tax efficient; we place an emphasis on low-cost investments, often choosing passive or "smart alpha" strategies combined with active strategies in sectors and asset classes that we believe are appropriate. Our firm primarily utilizes mutual funds and ETFs to provide broad diversification among asset classes, as well as individual bonds, stocks, and preferred securities when appropriate. The investment strategy for each client is based on their particular objectives outlined during consultations. A client may change those objectives at any time.

#### **Potential Risk of Loss**

We believe our strategies and investment recommendations are designed to produce the highest potential return for a given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. Investing in securities involves the risk of loss that an investor must be able to bear, which

may include risks regarding markets, interest rates, inflation, currencies, reinvestment, company and management risk, liquidity, among others.

**Market risk** – When the stock market as a whole or an industry as a whole falls, it can cause the prices of all individual securities to fall indiscriminately. This is also called systemic risk.

**Company risk** – When investing in securities, there is always a certain level of company or industry-specific risk inherent in each company or issuer, that a company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is referred to as “unsystematic risk” and can be reduced through appropriate diversification.

**Management risk** – Investments vary with the success and failure of a firm’s investment strategies, research, analysis, and determination of a portfolio.

**Passive market strategies** – A portfolio that employs a passive, efficient-markets approach has the potential risk that at times the broader allocation may generate lower-than-expected returns than those from a specific, more narrowly focused asset, and that the return on each type of asset is a deviation from the average return for the asset class.

**Active management strategies** – A portfolio that employs active management strategies may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading.

**Socially responsible investing** – A portfolio invested according to these principles carries a risk that returns on investments of this type may be limited and not be as well diversified. The number of publicly traded companies that meet certain parameters may be limited, and such a portfolio could be more volatile than a fully diversified portfolio.

## **Item 9 -- Disciplinary Information**

Neither Blue Spark Capital Advisors nor any member of the firm’s management ever has been involved in any criminal, civil, or administrative legal or disciplinary proceeding or event that could be material for a client’s evaluation of our firm’s advisory business or the integrity of our management.

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

Our policies require our firm and its associates to conduct business activities in a manner that avoids or mitigates conflicts of interest between the firm, its employees, and its clients, or that may be contrary to law. We provide disclosure to you prior to and throughout the term of our engagement regarding any conflicts of interest that might in our reasonable judgment compromise our impartiality or independence. Other financial industry activities or affiliations could be a source of potential conflicts of interest, so our firm does not engage in or maintain them.

Accordingly, neither the firm nor any member of firm management is registered, or intends to register, as a broker/dealer or a registered representative of a broker/dealer. Blue Spark Capital Advisors and its management are not registered nor have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Moreover, neither our firm nor a member of its management is or has a material relationship with any of the following types of entities:

- Broker/dealer, municipal securities dealer, or government securities dealer or broker;

- Futures commission merchant, commodity pool operator, or commodity trading advisor;
- Other investment advisor or financial planner;
- Banking or thrift institution;
- Accountant or accounting firm;
- Lawyer or law firm;
- Insurance company or agency;
- Pension consultant;
- Real estate broker or dealer;
- Sponsor or syndicator of limited partnerships; or
- 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).

At a client’s request, we may provide referrals to various professionals we know and trust, such as accountants, attorneys, insurance agents, or real estate and mortgage brokers. We do not have any agreements with nor receive fees from these professionals for these referrals.

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

### **Code of Ethics**

We have a written Code of Ethics that establishes policies for ethical conduct for all our personnel. Blue Spark is not only committed to complying with all applicable laws and regulations but also to act in an ethical, compassionate, and responsible manner in all its professional services and activities. As a general matter, we seek to avoid conflicts of interest with our clients and will disclose any that may arise and take appropriate steps consistent with our Code of Ethics to resolve them. Our policies are based on the principle that we have a fiduciary obligation to our clients. In this fiduciary capacity, we must place the interest of our clients before our own interests and the interests of persons and entities related to us. Specifically, our Code of Ethics includes prohibitions against insider trading, and policies regarding personal securities trading, gifts, and political contributions.

Our chief compliance officer is responsible for overseeing adherence to the Code of Ethics. We periodically review and amend it to ensure that it remains current, and we require all firm personnel to attest to their understanding of and adherence to it at least annually.

We provide any client or prospective client with a copy of our Code of Ethics at their request.

### **Privacy Policy Statement**

We respect the privacy of all our clients and prospective clients, both past and present. We recognize that clients have entrusted us with non-public personal information, and we require that all employees and clients know our strict policy protecting that information.

We do not disclose non-public personal information about our clients to anyone, except with the express written authorization of you the client and under limited circumstances (such as to open an account or speak with your CPA). Our privacy principles are disclosed in our Privacy Policy and Notice, which we provide clients

on an annual basis as per federal law and at any time, in advance, if our policy were expected to change.

To ensure security and confidentiality, we maintain strict rules and strong physical, electronic, and procedural safeguards to protect the privacy of client information.

#### **Investment Recommendations Involving a Material Financial Interest**

Our firm does not, and all our related persons are prohibited from, recommending to a client or purchasing from or selling for a client any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, and the like. In addition, our firm does not borrow from or lend to clients, and our employees are prohibited from borrowing from or lending to a client.

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

Our firm does not trade for its own account. However, a related person of the firm may personally buy or sell the same (or related) securities as those which we recommend to clients for their accounts. Also, recommendations made to one client may be different in nature or in timing from a recommendation made to another client, as clients often have different objectives, risk tolerances, and time horizons. At no time, however, will our firm or any of its associates receive preferential treatment over our clients, or provide preferential treatment to one client over another.

In an effort to reduce or eliminate certain conflicts of interest (i.e., trading ahead of a client order, etc.) involving the firm or personal trading, our policy imposes trading restrictions and pre-clearance of certain trades to avoid conflicts of interest. Any exceptions must be approved or pre-cleared by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records as required by law.

### **Item 12 -- Brokerage Practices**

#### **Selecting Custodians/Brokerage Providers**

All our clients' assets are maintained in clients' names in accounts at a third-party "qualified custodian," Schwab Advisor Services™ ("Schwab"). We also use Schwab as the broker-dealer for trades. **Our firm is independently owned and operated and is not affiliated with Schwab nor any other custodian or service provider.** We do not accept client referrals from Schwab Institutional nor any other custodian or broker-dealer.

Schwab Advisor Services™ serves independent investment advisory firms such as ours. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefit received by Blue Spark or its personnel does not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to clients, our firm at all times must put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the firm or its related persons in and of itself may create a potential conflict of interest and may indirectly influence the firm's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Blue Spark regularly reviews the factors used to select a custodian to ensure our recommendation is appropriate. The following is a more detailed description of

Schwab's support services:

Services that benefit you. Schwab's institutional services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some that we might not otherwise have access to or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts;
- Assists with back-office functions, recordkeeping, and client reporting.

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events;
- Consulting on technology, compliance, legal, and business needs;
- Publications and conferences on practice management and business succession.

Your brokerage and custody costs. For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

### **Research and Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with Schwab or other custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a client. However, the fact we are on Schwab's institutional platform may provide us with certain services that may benefit us.

### **Best Execution**

Best execution means that a broker-dealer offers the most favorable terms for a transaction based on all relevant factors, including the range and quality of the services when placing brokerage, its execution capability, commission rates, financial responsibility, responsiveness to the advisor, and the value of any research services provided. We recognize and take seriously our obligation to seek "best execution" for our clients, and it is our belief that the determinative factor is not always the lowest possible cost but whether the service provider's transactions represent the best qualitative execution taking into consideration the full range of services provided. Therefore, we seek services with competitive but not necessarily the lowest possible rates for each transaction. We have determined that having Schwab at this time execute our account trades is consistent with our duty to seek "best execution." We periodically review our

policies regarding our service providers that we recommend to our clients in light of this duty.

#### **Directed Brokerage**

At this time, clients may not direct us to use a different custodian or broker-dealer. If we were to accept directed brokerage in the future and a client preferred a different service provider, our recommendation would be based on the client's needs, overall cost, and ease of use. We periodically analyze other service providers for a better alternative for our clients, including a review of their services and reasonableness of fees in comparison to their industry peers. If we allowed clients to direct brokerage, we would advise them that they may pay higher commissions or not receive the most favorable execution.

#### **Aggregating Securities Transactions**

We generally place orders for trades for each of our clients independently unless we decide to purchase or sell the same securities for several clients at approximately the same time, often termed "aggregated" or "batched" orders.

We may, but are not obligated to, aggregate orders in an attempt to obtain better execution, negotiate more favorable transaction rates, or to allocate trades equitably among our client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been separately placed. Should we aggregate orders, transactions will generally be averaged as to price and allocated among each client on a prorated basis on any given day and we will attempt to do so in accordance with applicable industry standards. Trades that are executed separately and not aggregated may be assessed higher transaction costs than those that are batched. We review both our trade aggregation procedures and allocation processes on a periodic basis to ensure they remain within stated policies and regulation. We will inform you, in advance, should our trade aggregation and allocation practices change at any point in the future. We do not receive any additional compensation or remuneration should we decide to aggregate orders.

#### **Trade Errors**

The firm corrects all trade errors through a trade error account maintained by the firm's custodian. If there ever were an error with respect to trades made on behalf of client accounts, we would reimburse those accounts for losses or return gains that are due to trade errors that went uncorrected. We endeavor to detect and correct any trade errors prior to settlement.

### **Item 13 -- Review of Accounts**

#### **Reviews**

##### **Investment Management Services**

We review investment management accounts on a quarterly and usually on a more frequent basis. Reviews may also be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding, or a change in your financial goals. Accounts may also be rebalanced in accordance with your Investment Policy Statement, and be reviewed for an additional holding or when an increase or decrease in a current position is under consideration. Account cash levels above or below what we deem appropriate, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

### **Reports and Frequency**

For our investment management engagements, the custodian provides clients with monthly written reports on account status and activity. In addition, our firm may periodically provide written or electronic portfolio updates and performance summary reports.

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

### **Client Referrals**

Blue Spark Capital Advisors receives many referrals from current clients, friends, attorneys, accountants, and the like. We value and appreciate these referrals. However, we do not engage in nor do we pay for investment advisor solicitation as defined by New York law.

Because of our fiduciary duty of client privacy, we do not provide names of clients as references. However, we host events throughout the year and prospective clients are encouraged to attend to speak to current clients at their discretion.

### **Other Compensation**

We do not receive any economic benefits from persons that are not clients for providing investment advice or other advisory services, such as sales awards or prizes.

## **Item 15 – Custody**

Your funds and securities managed by us are held in your name at an unaffiliated, third-party qualified custodian; at this time, it is Charles Schwab & Co. Your assets are never held by our firm or any of our associates, and our firm never has possession of them.

In keeping with our custody policy, we:

- Restrict our firm and associates from acting as trustee for or having full power of attorney over a client account;
- Prohibit any authority to withdraw securities or cash from a client account, other than for payment of our advisory fees or transaction settlement. These actions will be accomplished through the custodian maintaining your assets, pursuant to our written Agreement;
- Do not accept, or forward, client securities erroneously delivered to our firm;
- Will not authorize any associate to have knowledge of a client's account access information (i.e., online access to brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent.

We auto-deduct our fees from clients' accounts with the custodian. The custodian sends monthly account statements directly to you, and we urge you to compare the statements you receive from your custodian with those you may receive from us.

## **Item 16 – Investment Discretion**

We generally provide our investment management services under discretionary authority. Under a limited power of attorney, discretionary authority allows us to manage your accounts, implement investment



decisions, such as the purchase or sale of a security on behalf of your account, without requiring your authorization for each transaction. Our power of attorney only extends to the placement of trade orders and the deduction of advisory fees. You may limit our discretion by notifying us in writing to that effect.

### **Item 17 -- Voting Client Securities**

#### **Proxy Voting**

Our firm does not vote proxies on clients' behalf. Clients have the exclusive responsibility for proxy voting, as well as making other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings. You will receive proxies or other similar solicitations directly from your custodian or transfer agent. We do not generally forward proxy statements or other correspondence relating to the voting of securities, class action litigation, or other corporate actions for securities you hold. We urge you to contact the issuer, the transfer agent, or legal counsel with questions regarding any proxy or other communications you receive.

### **Item 18 -- Financial Information**

#### **Balance Sheet**

Due to the nature of our firm's services and operational practices, we provide an audited balance sheet when required by law.

#### **No Financial Conditions Likely to Impair Ability to Meet Commitments to Clients**

The firm and its management do not have any financial condition likely to impair the ability to meet our commitment to our clients. The firm nor its management have never been the subject of any bankruptcy petitions.



## Form ADV Brochure Supplement (Part 2B)

### Key Employee Biographical Information

#### **Education and Business Standards**

Blue Spark Capital Advisors requires that its financial advisors have at least a bachelor's degree and further coursework demonstrating knowledge of investments, financial planning and estate and tax planning. Examples of coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, or CPA. Additionally, financial advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

#### **Professional Certifications**

Employees have earned certifications and credentials that can be explained in further detail.

***Certified Financial Planner (CFP®)***: For more information, visit [www.cfp.net](http://www.cfp.net). CFP practitioners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board.
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

***Chartered Financial Analyst (CFA)***: Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or equivalent work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of professional work experience in the investment decision-making.
- Fulfill society requirements, which vary by society.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

***Certified Public Accountant (CPA)***: Certified Public have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA. CPA certification requirements:

- Pass the Uniform Certified Public Accountant Examination (Uniform CPA Exam).
- Complete 24 months of acceptable professional work experience.
- Pass the AICPA self-study Professional Ethics examination for CPAs.
- Commit to continuing education courses in order to renew the license.

## **MAURA GRIFFIN, CFP®**

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CEO, Founder, Wealth Advisor and Financial Planner, **Blue Spark Capital Advisors**

### Educational Background

M.B.A. – Finance, **Columbia University** Graduate School of Business; New York, N.Y.

B.A. – Literature, **Georgetown University**; Washington D.C.

### Business Experience

Blue Spark Capital Advisors (2011 - Present) New York, N.Y.

CEO and Founder/Principal/Chief Compliance Officer/Managing Member

Capital Group Companies (2006 - 2012) New York, N.Y.

Associate Vice President

Maura Griffin, born in 1964, is a proud CERTIFIED FINANCIAL PLANNING™ professional.

## **MATTHEW LENT CAREY**

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Wealth Advisor and Financial Planner, **Blue Spark Capital Advisors**

### Educational Background

M.B.A. – Finance/Marketing, **Northwestern University**; Evanston, Ill.

B.A. – **Georgetown University**; Washington D.C.

### Business Experience

Blue Spark Capital Advisors (2012 - Present) New York, N.Y.

Iona University, New Rochelle, N.Y. (2011 - Present) Director, Center for Financial Market Studies

Matt, born in 1967, has passed all CFP® coursework and plans to sit for the exam this year.