



Litvak Wealth, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 7, 2024

This Form ADV (“Disclosure Brochure”) provides information about the qualifications and business practices of Litvak Wealth, LLC (“Litvak” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (203) 227-8000.

Litvak is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Litvak to assist you in determining whether to retain the Advisor.

Additional information about Litvak and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor firm name or CRD# 170805.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Litvak. For convenience, the Advisor combined these documents into a single disclosure document.

Litvak believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Litvak encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes made to this Disclosure Brochure since the last filing and distribution to Client.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Litvak.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or our CRD# 170805. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (203) 227-8000.

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Item 4 – Advisory Services

A. Firm Information

Litvak Wealth, LLC (“Litvak” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission and is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. Litvak was founded in May 2014 and is primarily owned by Litvak & Company LLC. Ricardo Litvak (Founder and Chief Executive Officer) is the majority owner of Litvak & Company LLC. Litvak is operated by Mr. Litvak, Juliana Fajardo (Chief Operating Officer and Chief Compliance Officer) and Jeffrey Boris (Chief Investment Officer and Head of Investments and Research) (collectively the “Principal Officers”). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by the Advisor.

B. Advisory Services Offered

Litvak offers investment advisory services to individuals, high net worth individuals, personal trusts and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Litvak’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Litvak provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and consulting services. Litvak works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Litvak will then construct a customized portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”), individual equity securities, fixed income products and alternative investments to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds and other investment vehicles to meet the needs of its Clients.

Litvak’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Litvak will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Litvak evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Litvak may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Litvak may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Litvak may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Limited Scope - Litvak may also provide customized investment advisory solutions for its Clients in a limited scope capacity, where Litvak does not have access and authority to execute trades on behalf of the Client. In these relationships, Litvak will provide regular and continuous oversight and make recommendations on how to manage Client assets as described above, reporting services, and assist with administrative changes in the account by coordinating with the related Custodian. Litvak would also provide feedback to the Client should any expected transactions or updates not reconcile to the expectations of Litvak or the Client and coordinate with the Custodian to resolve any issues that arise.

Retirement Accounts – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will Litvak accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the Client investment advisory agreement, please see Item 12 – Brokerage Practices.

Use of Independent Managers

When deemed to be in the Client’s best interest, Litvak will recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In such instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with the Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures).

C. Client Account Management

Prior to engaging Litvak to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Litvak, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Litvak will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Litvak will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Litvak will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

Litvak does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Litvak.

E. Assets Under Management

As of December 31, 2023 the Advisor manages \$449,007,175 in Client assets, \$12,575,359 of which are managed on a discretionary basis and \$436,431,816 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly in arrear at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees range up to 1.50% annually. Certain Clients may be offered a tiered fee schedule. Investment advisory fees vary depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Clients engaging for the limited scope service are typically charged a lower fee.

The investment advisory fee in the first Billing Period of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Litvak will be independently valued by the Custodian. Litvak will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses described in Item 5.C, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.50% annually.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by the Advisor and deducted from the Client's account at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter end date. This annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the average market value of the Client's Account(s) as of the last business day of each month during the previous quarter end date. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Litvak directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include Litvak's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

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C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Litvak, in connection with investments made on behalf of the Client's account[s]. The Advisor covers the cost of the first 5 wires fees incurred by the Client, any wire fees after that the Client will be responsible for. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The investment advisory fee charged by Litvak is separate and distinct from these custody and execution fees.

In addition, all fees paid to Litvak for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Litvak, but would not receive the services provided by Litvak which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Litvak to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Litvak is compensated for its services at the end of the quarter, after investment management services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client or the Advisor and that Independent Manager. Litvak will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

Litvak does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment advisory fees noted above.

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

Litvak does not charge performance-based fees for its investment advisory services. The fees charged by Litvak are as described in Item above and are not based upon the capital appreciation of the funds or securities held by any Client.

Litvak does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Litvak provides investment advisory services individuals, high net worth individuals, personal trusts and estates. Litvak generally requires a minimum relationship size of \$2,000,000, which may be reduced at the sole discretion of the Advisor.

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

A. Methods of Analysis

Litvak primarily employs fundamental analysis in developing investment strategies for its Clients. Research and analysis from Litvak are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

As noted above, Litvak generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Litvak will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Litvak may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Litvak will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

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Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary disclosures involving Litvak or any of its management persons. Litvak values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 170805.

Item 10 – Other Financial Industry Activities and Affiliations

Litvak Solutions, LLC

Certain Advisory Persons of Litvak also provide services through Litvak Solutions, LLC. Litvak Solutions is an affiliated entity through common ownership. Litvak Solutions is a non-advisory consulting business that assists businesses and high net worth individuals with non-advisory support services. These services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. Owners will benefit financially if Clients engage the services of Litvak Solutions. Clients of the Advisor may be offered the services of Litvak Solutions. Clients are not obligated to engage Litvak Solutions for these services in order to maintain an advisory relationship with the Advisor.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation, nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A. The Advisor will ensure that prior to selecting Independent Managers that they are properly licensed or registered as an investment adviser. All fees will be properly disclosed to the Client.

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

A. Code of Ethics

Litvak has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. This Code applies to all persons associated with Litvak (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to the Client. Litvak and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Litvak Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (203) 227-8000.

B. Personal Trading with Material Interest

Litvak allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Litvak does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Litvak does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Litvak allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a potential conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor adopted a Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Litvak have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Litvak requiring reporting of personal securities trades by its Supervised Persons for review by the Supervised Person’s supervisor or the Chief Compliance Officer (“CCO”). The Advisor also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Litvak allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward.

At no time will Litvak, or any Supervised Person of Litvak, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Litvak does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Litvak to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Litvak does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Litvak does not exercise discretion over the selection of the Custodian, the Advisor will typically recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by Litvak. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Litvak may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian’s offices.

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Litvak will generally recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions, a division of Fidelity Investments, Inc. ("Fidelity"). Fidelity is an unaffiliated SEC-registered broker-dealer and FINRA member (hereinafter referred to as the "Fidelity"). Fidelity will serve as a "qualified custodian" for Clients. Litvak maintains an institutional relationship with Fidelity, whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

The following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **Litvak does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from Fidelity. Please see Item 14.**

2. Brokerage Referrals - Litvak does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Litvak will place trades within the established account[s] at the Custodian as directed by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Litvak will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. For Clients engaged for discretionary investment management services,

Litvak will execute its transactions through the Custodian as directed by the Client. Litvak may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts. Executing a block trade is not generally available to clients engaged for non-discretionary investment management services.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by advisory persons of Litvak. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Litvak if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Litvak

Litvak is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Litvak does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Litvak may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Litvak may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platforms

Litvak has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platforms is provided at no charge to the Advisor. The Advisor receives access to software and related support with minimal cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; access to research; and access to an electronic communication network for Client order entry and account information.

B. Compensation for Client Referrals

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

Litvak does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Litvak to utilize the Custodian for the Client's security transactions. Litvak encourages Clients to review statements provided by the account Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

For Clients engaged for non-discretionary services, Litvak may not have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. The Advisor will contact the Client and obtain approval prior to executing trades. These purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Litvak.

Litvak Wealth, LLC

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For Clients engaged for discretionary services, Litvak may have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Litvak. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Litvak will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Litvak accepts proxy-voting responsibility for securities held in Client accounts when provided by the Client. The advisory agreement between Litvak and the Client will generally specify whether or not Litvak has the authority to vote proxies on behalf of a particular Client.

Proxy Voting Policy and Procedures

Litvak shall vote proxies in the best interest of its Clients and shall not subrogate the Client interest to its own. Litvak monitors corporate actions through the Custodian. Litvak receives notice of upcoming proxy votes, meeting and record dates and other information on upcoming corporate actions by companies in which Litvak Clients are shareholders. Clients may request a copy of Litvak's proxy voting records, free of charge, by contacting Litvak.

Conflicts of Interest in the Voting Process

On occasion, a conflict of interest may exist between the Advisor and the client regarding the outcome of certain proxy votes. In such cases, the Advisor is committed to resolving the conflict in the best interest of the clients before we vote the proxy in question.

Client Direction of Voting

Although most of our Clients for whom we vote proxies authorize us to vote in accordance with our proxy voting policy, a Client may request that we vote its proxies in accordance with a different policy. We try to accommodate such requests. In addition, a Client may direct us to vote its securities in a particular way on a particular proposal and we will seek to do so, assuming timely receipt of the instruction.

Item 18 – Financial Information

Neither Litvak, nor the Principal Officers have any adverse financial situations that would reasonably impair the ability of Litvak to meet all obligations to its Clients. Neither Litvak, nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. Litvak is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

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Form ADV Part 2B – Brochure Supplement

for

**Ricardo J. Litvak
Founder and Chief Executive Officer**

Effective: March 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ricardo J. Litvak (CRD# 2476755) in addition to the information contained in the Litvak Wealth, LLC (“Litvak” or the “Advisor” with CRD# 170805) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Litvak Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (203) 227-8000.

Additional information about Mr. Litvak is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2476755.

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Item 2 – Educational Background and Business Experience

Ricardo J. Litvak, born in 1961, is dedicated to advising Clients of Litvak in his role as the Founder and Chief Executive Officer. Mr. Litvak earned a Bachelor of Arts in Economics from McGill University. Mr. Litvak also earned a Master of Business Administration from Babson College. Additional information regarding Mr. Litvak's employment history is included below.

Employment History:

Founder and Chief Executive Officer, Litvak Wealth, LLC	04/2014 to Present
Owner and Chief Executive Officer, Litvak Solutions, LLC	04/2014 to Present
Investment Representative, Morgan Stanley	09/2008 to 04/2014

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Litvak. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Litvak.*** However, the Advisor does encourage you to independently view the background of Mr. Litvak on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2476755.

Item 4 – Other Business Activities

Litvak Solutions, LLC

Mr. Litvak provides services through Litvak Solutions, LLC. Litvak Solutions is an affiliated entity through common ownership. Litvak Solutions is a non-advisory consulting business that assists businesses and high net worth individuals with non-advisory support services. These services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. Owners will benefit financially if Clients engage the services of Litvak Solutions. Clients of the Advisor may be offered the services of Litvak Solutions. Clients are not obligated to engage Litvak Solutions for these services in order to maintain an advisory relationship with the Advisor. Approximately 5% of his time is spent on this activity.

Item 5 – Additional Compensation

Mr. Litvak has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Litvak serves as the Founder and CEO of Litvak and is also supervised by Juliana Fajardo the Chief Compliance Officer. Ms. Fajardo can be reached at (203) 227-8000.

Litvak has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Litvak. Further, Litvak is subject to regulatory oversight by various agencies. These agencies require registration by Litvak and its Supervised Persons. As a registered entity, Litvak is subject to examinations by regulators, which may be announced or unannounced. Litvak is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Juliana P. Fajardo
President, Chief Operating Officer
and Chief Compliance Officer**

Effective: March 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Juliana P. Fajardo (CRD# 4765241) in addition to the information contained in the Litvak Wealth, LLC (“Litvak” or the “Advisor” with CRD# 170805) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Litvak Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (203) 227-8000.

Additional information about Ms. Fajardo is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4765241.

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Item 2 – Educational Background and Business Experience

Juliana P. Fajardo, born in 1982, is dedicated to advising Clients of Litvak in her role as the Chief Operating Officer and Chief Compliance Officer. Ms. Fajardo earned Bachelor of Arts in Economics and International Relations from the University of Miami in 2003. Additional information regarding Ms. Fajardo's employment history is included below.

Employment History:

Chief Operating Officer and Chief Compliance Officer, Litvak Wealth, LLC	07/2014 to Present
President, Litvak Solutions, LLC	07/2014 to Present
Investment Representative, Morgan Stanley	06/2009 to 06/2014
Analyst, Morgan Stanley	10/2006 to 06/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Fajardo. Ms. Fajardo has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Fajardo. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Fajardo.*** However, the Advisor does encourage you to independently view the background of Ms. Fajardo on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4765241.

Item 4 – Other Business Activities

Litvak Solutions, LLC

Ms. Fajardo provides services through Litvak Solutions, LLC. Litvak Solutions is an affiliated through common ownership. Litvak Solutions is a non-advisory consulting business that assists businesses and high net worth individuals with non-advisory support services. These services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. Owners will benefit financially if Clients engage the services of Litvak Solutions. Clients of the Advisor may be offered the services of Litvak Solutions. Clients are not obligated to engage Litvak Solutions for these services in order to maintain an advisory relationship with the Advisor. Approximately 5% of her time is spent on this activity.

Item 5 – Additional Compensation

Ms. Fajardo has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Fajardo serves as the Chief Operating Officer and Chief Compliance Officer of Litvak. Ms. Fajardo can be reached at (203) 227-8000.

Litvak has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Litvak. Further, Litvak is subject to regulatory oversight by various agencies. These agencies require registration by Litvak and its Supervised Persons. As a registered entity, Litvak is subject to examinations by regulators, which may be announced or unannounced. Litvak is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

Jeffrey P. Boris
Chief Investment Officer

Effective: March 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey P. Boris (CRD# 2684794) in addition to the information contained in the Litvak Wealth, LLC (“Litvak” or the “Advisor”) (CRD # 170805) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Litvak Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (203) 227-8000.

Additional information about Mr. Boris is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2684794.

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Item 2 – Educational Background and Business Experience

Jeffrey P. Boris, born in 1973, is dedicated to advising Clients of Litvak in his role as Chief Investment Officer, Head of Investments and Research. Mr. Boris earned a Masters in Business Administration from Northwestern University in 2001. Mr. Boris also earned a Bachelor of Arts from Boston College in 1995. Additional information regarding Mr. Boris's employment history is included below.

Employment History:

Chief Investment Officer, Head of Investments and Research, Litvak Wealth, LLC	09/2014 to Present
Consultant, Litvak Solutions, LLC	09/2014 to Present
Director – Equities, Commonfund Asset Management	06/2006 to 07/2014
Associate Director, Commonfund Asset Management	06/2004 to 06/2006

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Boris. Mr. Boris has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Boris. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Boris.*** However, the Advisor does encourage you to independently view the background of Mr. Boris on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2684794.

Item 4 – Other Business Activities

Litvak Solutions, LLC

Mr. Boris provides services through Litvak Solutions, LLC. Litvak Solutions is an affiliated entity through common ownership. Litvak Solutions is a non-advisory consulting business that assists businesses and high net worth individuals with non-advisory support services. These services are separate and distinct from the advisory services offered to Clients and based on the unique needs of each Client. Owners will benefit financially if Clients engage the services of Litvak Solutions. Clients of the Advisor may be offered the services of Litvak Solutions. Clients are not obligated to engage Litvak Solutions for these services in order to maintain an advisory relationship with the Advisor. Approximately 5% of his time is spent on this activity.

Item 5 – Additional Compensation

Mr. Boris has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Boris serves as the Chief Investment Officer, Head of Investments and Research for Litvak and is supervised by Ricardo Litvak (Founder and Chief Executive Officer) Juliana Fajardo (President, Chief Operating Officer and Chief Compliance Officer). The Principal Officers can be reached at (203) 227-8000.

Litvak has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Litvak. Further, Litvak is subject to regulatory oversight by various agencies. These agencies require registration by Litvak and its Supervised Persons. As a registered entity, Litvak is subject to examinations by regulators, which may be announced or unannounced. Litvak is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Privacy Policy

Effective Date: March 7, 2024

Our Commitment to You

Litvak Wealth, LLC ("Litvak" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Litvak (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Litvak does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Litvak does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Litvak or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Litvak does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (203) 227-8000.