

FORM ADV PART 2A APPENDIX 1

WRAP FEE PROGRAM

BROCHURE

STONY POINT WEALTH MANAGEMENT INC.



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# STONY POINT

WEALTH MANAGEMENT

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9020 Stony Point Parkway  
Richmond, VA 23235

**March 26, 2019**

This wrap fee program brochure provides information about the qualifications and business practices of Stony Point Wealth Management Inc. If you have any questions about the contents of this brochure, please contact us at (804) 332-6574 or via email at [elizabeth@stonypointwealth.com](mailto:elizabeth@stonypointwealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Our registration does not imply a certain level of skill or training.

Additional information about Stony Point Wealth Management Inc. (CRD# 210519) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2:       Material Changes**

This Brochure, dated March 26, 2019, has no material changes to report. This Brochure was last updated on March 30, 2018. In the future, we will ensure that clients of the Firm will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of the Firm's fiscal year.

DISCLOSURES: Stony Point may, at any time, update this Wrap Fee Brochure. A copy of the Wrap Fee Brochure or an offer to send a copy of this Wrap Fee Brochure (either by electronic means (e-mail) or in hard copy form) may be sent if a material change occurs in the future. A person may view the current brochures online at the SEC's Investment Adviser Public Disclosure website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select the option for a "Firm" search and enter 210519 (Stony Point's CRD number) in the field labeled "Firm Name or CRD/SEC#". This will provide access to Form ADV Part 1, Part 2a Disclosure Brochure and the Wrap Fee Program Brochure.

A person may request a copy of the brochures at any time by contacting the Chief Compliance Officer via email at [elizabeth@stonypointwealth.com](mailto:elizabeth@stonypointwealth.com) or via telephone at (804) 332 6574. There is no charge for this service.

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## WRAP FEE PROGRAM

### STONY POINT WEALTH MANAGEMENT INC.

#### **Item 4: Services, Fees, and Compensation**

The Stony Point Wrap Program (the "Program") is a wrap fee program sponsored by Stony Point Wealth Management Inc. ("Stony Point") which has been in business since May 2015. Matthew Daniel, Elizabeth King and Stuart Daniel are the firm's principal owners. Together, the owners have been in the financial services industry for over 50 years.

Stony Point provides personalized asset management, portfolio monitoring and financial planning services. All available services may be offered together or on an individualized basis at the client's discretion. The Firm provides investment advice to individuals, families, trusts, charitable organizations and foundations, pensions and corporations. We believe that working with multiple generations of the same family can enhance the depth to which we understand a client and their situation, and encourage multi-generational families to align their goals. Potential for conflicts of interest exist with the exchange of intergenerational information. Stony Point attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent. Stony Point strives to provide clients with a high level of individual attention by getting to know the client and tailoring the services to their needs.

Wealth should continue to build steadily over time, and Stony Point's view is that steady growth over a period of years will be more beneficial to clients than shooting for unattainable returns year after year. We look at a client's entire financial picture, ask targeted questions and listen closely to your answers. Our goal is for you to experience financial confidence now and in retirement.

#### **A. Description of the Program**

Stony Point serves as a program sponsor and portfolio manager for its own wrap fee program, the *Stony Point Wrap Fee Program* (the "Program"). Stony Point clients are primarily managed through the Program. When a client participates in the Program, they will pay a single fee which include asset management and portfolio monitoring, the custodial and administrative costs incurred within their account(s) as well as Stony Point's advisory fee. The minimum household size for participation in the Program is \$150,000. Financial planning and financial plan management services may be provided as well but is done under a separate financial planning agreement.

Fees in the wrap program include transaction costs for the purchase or sale of securities, but do not include expenses related to the use of margin, wire transfer fees, the fees charged to shareholders of mutual funds or ETFs, mark-ups and mark-downs, spreads, odd-lot differentials, fees charged by regulatory agencies, and any transaction fees for securities trades executed by a broker-dealer other than the agreed upon custodian.

Because of the nature of a wrap fee program, where wrap fees are not tied to an account's frequency of trading and apply to generally all assets in the account, the wrap fee program client may pay more or less than if the client had compensated Stony Point outside of the wrap fee program. For example, if a client's account is rarely traded, the transaction fees the client would have paid would be minimal, thus limiting the benefits of "wrapping" management fees and transaction fees. Clients whose accounts will be rarely traded should carefully consider whether the Wrap Program is appropriate.

## Assets Under Management

As of March 8, 2019, Stony Point has \$238,001,293 in assets under management. Approximately \$226,968,865 is managed on a discretionary basis and \$11,032,428 is managed on a non-discretionary basis.

### Schwab's Brokerage Services.

In addition to the foregoing portfolio management and other services, the Program includes the brokerage services of Charles Schwab & Co., Inc. ("Schwab") a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. Stony Point is an independently owned and operated and not affiliated with Schwab. Schwab will act solely as a broker-dealer and not as an investment advisor to you. It will have no discretion over your account and will act solely on instructions it receives from us [or you]. Schwab has no responsibility for our services and undertakes no duty to you to monitor our management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when we [or you] instruct them to. While we require that you use Schwab as custodian/broker to participate in our program, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with Schwab, then we cannot manage your account in the program. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described below.

## **B. Fees and Compensation**

Asset-based advisory fees are paid monthly, in arrears, based upon the average daily balance of a client's managed assets for the prior month and in accordance with the fee schedule listed in the Investment Advisory Agreement between Stony Point and the client. Stony Point's advisory fee schedule for asset management services will typically be as follows:

| Household AUM              | Annual Fee |
|----------------------------|------------|
| Up to \$300,000            | 1.25%      |
| \$300,001 to \$500,000     | 1.10%      |
| \$500,001 to \$1,000,000   | 1.00%      |
| \$1,000,001 to \$1,500,000 | 0.90%      |
| \$1,500,001 to \$2,000,000 | 0.80%      |
| \$2,000,001 and greater    | 0.70%      |

The minimum household balance required to participate in the Program is \$150,000. The fee schedule reflected here is a guide. Fees are negotiable based on the nature of the account. Factors affecting client's fee schedule may include the size of the account, complexity of asset structures, and other factors. All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs. When a client engages Stony Point to manage held-away assets, a reduced advisory fee may be charged. This will be documented in the client's Investment Advisory Agreement.

## Financial Planning

A financial plan is designed to help the client with all aspects of financial planning with or without on-going investment management after the financial plan is completed. Fees for financial planning services may be offered on an hourly or fixed fee basis.

**Hourly:** For clients needing advice with a limited scope, financial planning services can be done on an hourly basis. Hourly rates range from \$150 – \$350 for all investment professionals at Stony Point. The hourly rate is dependent upon a number of factors, most importantly the complexity of the assignment and the skill level of the investment professional engaged. An estimate of total hours to complete the assignment will be determined at the start of the engagement. A deposit of fifty percent (50%) of the estimate will be payable upon signing the Financial Planning Agreement. The final amount due will be based upon actual hours expended.

**Fixed Fee:** For clients requiring a complete financial plan, services will be provided on a fixed fee basis. Fixed fees will typically range from \$2,500 to \$20,000, depending upon the nature and complexity of the assignment. For example, a client with complex estate planning issues, multiple sources of investment income, and special needs heirs will have a more complex plan (and therefore a higher fixed fee) than a client with no estate planning issues, a single heir and a single source of income. Fees are negotiable based on the nature of the assignment. A deposit of fifty percent (50%) of the estimate will be payable upon signing the Financial Planning Agreement. The final amount due will be fifty percent (50%) of the fixed fee upon delivery of the financial plan.

### Fee Terms

The following terms apply to client accounts with asset based fees. All advisory fees and household minimums are subject to negotiation. Stony Point may offer discounted rates to its employees and their families as well as to institutional and ultra, high-net-worth clients with substantial account balances. Financial planning services offered to clients with a household balance in excess of \$1,000,000 will be performed for no charge.

For clients whose assets are managed by the Firm, investment advisory fees will be debited directly from each client's account. The advisory fee is paid monthly in arrears, or in the case of held-away assets, quarterly in arrears. The value used for the fee calculation is the daily average balance of the portfolio for the previous month. The daily average balance is the sum of each day's balance divided by the number of days during that month. This means that if your annual fee is 1.00%, we will take the previous month's daily average balance, multiply the value by 1.00%, and then divide by 12 to calculate our fee. The values used for fee calculations will be based off the valuations provided by the qualified custodian which holds your assets. To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to Stony Point. While almost all of our clients choose to have their fee debited from their account, we will invoice clients upon request. Payment is due within 15 days of receipt of the invoice.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. Stony Point generates an itemized fee invoice which is then uploaded to the client portal for ease of access. It is a Client's responsibility to review this calculation as well as compare the withdrawal amount the custodial statement. The fee invoice itemizes the fees to be debited, including the formula used to calculate the fee, the amount of assets upon which the fee is based, and the time period covered by the fee. The invoice will also state that the fee has not been independently calculated by the custodian.

If you become a client during a billing period, you will pay a management fee for the number of days left in that billing period. If you terminate our relationship during a billing period, you will be responsible for the payment of management fees for the portion of the billing period during which you were a client. Once your notice of termination is received, we will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way you direct (check, wire). Stony Point will cease to perform services, including processing trades and distributions, upon termination. Client accounts will be "de-linked" upon receipt of the termination notice - meaning the accounts will no longer be visible to Stony Point and will become a retail account with the custodian.

## **Fees We Pay Schwab.**

In addition to compensating us for our portfolio management, other investment advisory, and other services to you, the wrap fees you pay us also allow us to pay Schwab for the brokerage services it provides to you, as described above, as well as additional services Schwab provides us, as described below. The fees we pay Schwab consist primarily of transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. Stony Point can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

The fees we pay Schwab may be more than what we would pay solely for Schwab's brokerage services. In addition to those brokerage services, for the fees we pay Schwab we also receive from a Schwab affiliate a software system and related support services called the "Integrated Office," which helps us manage our client relationships and client investment portfolios. More detail on this arrangement appears below under "Additional Compensation We Receive."

## **Relative Cost of Our Wrap Fee Program to You.**

The program may cost you more or less than purchasing our investment advice and Schwab's brokerage services separately. The relative cost of our wrap fee program to you is influenced by various factors, including the cost of our investment advice and Schwab's brokerage services if you purchased them separately, the types of investments held in your account, and the frequency and size of trades we make for your account. For example, if the number of transactions in your account is low enough, the wrap fee you pay us may exceed the stand-alone investment advisory fee and separate brokerage commissions that you otherwise would have paid. In addition, because the fees we pay Schwab and that comprise a portion of the wrap fee you pay us include certain transaction fees, client accounts that trade relatively frequently could disproportionately benefit from the program compared to accounts that trade less frequently.

Our fees for stand-alone investment advisory services that are comparable to those we provide as part of the program fall in the same range as fees for account in the Program.

## **C. Additional Fees and Costs You May Pay.**

Our wrap fee does not cover the fees and costs listed below, which may apply to assets in your enrolled accounts to which our wrap fee also applies, and to transactions in your accounts.

- Commissions and other fees for services provided by broker-dealers other than Schwab for transactions executed or effected by or through them that settle into or from your account at Schwab such as through our use of Schwab's Prime Brokerage or Trade Away Services. You will be responsible for paying any commissions and other fees or compensation charged by broker-dealers other than Schwab. Because you will pay our wrap fee in addition to any commissions and/or other charges paid to broker-dealers other than Schwab who execute transactions for your account, we may have an incentive to execute transactions for your accounts through Schwab, and this incentive could, in some circumstances, conflict with our duty to seek best execution.
- Fees charged by mutual fund companies, unit investment trusts (UITs), closed-end funds and other collective investment vehicles, including, but not limited to, sales loads (a portion of which are paid to Schwab) and/or charges and short-term redemption fees.
- Short-term redemption fees charged by Schwab for funds other than those available through the Schwab Mutual Fund OneSource® service.

- Markups and markdowns, bid-ask spreads, selling concessions and the like received by Schwab in connection with transactions it executes as principal by selling or buying securities to or from you for its own account. Principal transactions contrast with those in which Schwab acts as your agent in effecting trades between you and a third party. Schwab may make a profit or incur a loss on trades in which it acts as principal. Markups and markdowns and bid-ask spreads are not separate fees, but rather are reflected in the net price at which a trade order is executed.
- Transfer taxes, odd-lot differentials, certificate delivery fees, reorganization fees, fees required by law, and any other fees or charges similar to those described above.

A complete list of Schwab's charges and fees is contained in the Charles Schwab Institutional Pricing Guide, which you will receive promptly following the opening of your account with Schwab.

#### Pro-rata Fees

If you become a client during a month, you will pay a management fee for the number of days left in that month. If you terminate our relationship during a month, you will be responsible for the payment of management fees for the portion of the month during which you were a client. Once your notice of termination is received, we will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way you direct (check, wire). Stony Point will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to Stony Point and will become a retail account with the custodian.

#### **D. Additional Compensation We Receive.**

We may receive more compensation from your participation in our wrap fee program than if you purchased our investment advisory services and Schwab's (or another broker/custodian's) services separately. As part of the services for the fees we pay Schwab, Schwab pays for its affiliate to provide us with the Integrated Office (a customer relationship and portfolio management system and related support services). The Integrated Office benefits us and may indirectly benefit you by enhancing our service to you. If we did not have the fee arrangement with Schwab, as described above, Integrated Office would be available to us only through paying fees for it directly to Schwab's affiliate. Consequently, we may have an incentive to recommend that you participate in our wrap fee program and open your account with Schwab. That incentive may be based on our interest in receiving Integrated Office as part of our services/fees arrangement with Schwab rather than based on your interest in having the most appropriate fee arrangement for our investment advisory services and the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our recommendation of our wrap fee program, including the use of Schwab as custodian and broker, is in the best interests of those of clients to whom we recommend it based on an assessment of their investment objectives, financial situation, our investment plans and anticipated trading activity in their accounts and all other relevant factors.

#### **Item 5: Account Requirement and Type of Clients**

Clients participating in the program may include individuals, families, trusts, charitable organizations and foundations, pensions and corporations. Stony Point requires each client to place at least \$500,000 with the firm, and must have at least \$150,000 with the firm to participate in the wrap program. This minimum may be waived in the discretion of Stony Point.



## **Item 6: Portfolio Manager Selection and Evaluation**

The wrap fee program offered by Stony Point is sponsored by the firm, and Stony Point is the only portfolio manager. The only fees covered under the wrap fee program are transaction fees associated with the purchase and sale of securities in an account managed by Stony Point. All client accounts managed by Stony Point, including wrap fee program clients, are managed with similar processes, although account recommendations may differ. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type.

### Methods of Analysis, Investment Strategies and Risk of Loss

It is important for you to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

Our approach to asset management has multiple aspects. We primarily invest in stocks and exchange-traded funds ("ETFs"), as we believe that fewer and fewer fund managers are really adding value for the fees, as evidenced by their failure to beat their benchmarks. When this is the case, an investor adds risk related to that manager's judgement, without adding return versus an ETF or stock. Stocks and ETFs provide clients with a lower cost option, while mutual funds have to overcome higher expenses to give investors acceptable returns. If we feel that a mutual fund is the correct fit for a client, there are many factors that are involved in picking the correct manager, but Stony Point focuses on the tenure and even more importantly the track record of the manager.

The specific securities we recommend for your account will depend on market conditions and our research at the time. Generally, we recommend a mix of stocks, ETFs, and mutual funds. When used, specific funds are chosen based on where its investment objective fits into the asset allocation recommended by Stony Point, its risk parameters, past performance, peer rankings, fees, expenses, and any other aspects of the fund Stony Point deems relevant to that particular fund. We base our conclusions on predominantly publicly available research, such as regulatory filings, press releases, competitor analyses, and in some cases research we receive from our custodian or other market analyses. We will also utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

Each client's portfolio will be invested according to that client's investment objectives. We determine these objectives by interviewing the client and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a set of asset allocation guidelines. An asset allocation strategy is a percentage-based allocation to different investment types. For example, a client may have an asset allocation strategy that calls for 40-60% of the portfolio to be invested in equity securities, with 20% of that allocated to international equities and the remaining balance in fixed income. Another client may have an asset allocation of 50-60% in fixed income securities and the remainder equities. The percentages in each type that we recommend are based on the typical behavior of that security type, individual securities we follow, current market conditions, your current financial situation, your financial goals, and the timeline to get you to those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client's. Once we agree on allocation guidelines, risk tolerance, time horizon, and how to achieve these results, we will develop a written investment policy statement to guide all parties involved in the execution of these goals, including but not limited to, Stony Point, the client, the custodian, and the investment managers.

Upon completion of the investment policy statement, we will periodically recommend securities transactions in your portfolio to meet the guidelines of the asset allocation strategy. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules.

Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

#### Performance-Based Fees

Stony Point will not charge performance based fees. Voting

#### Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Stony Point will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Stony Point will not give clients advice on how to vote proxies.

#### **Item 7: Client Information provided to Portfolio Managers**

Please see response to Item 6, above.

#### **Item 8: Client Contact with Portfolio Managers**

Clients may contact Stony Point, the only portfolio manager, at any time.

#### **Item 9: Additional Information**

##### **Disciplinary Information**

Neither the firm nor any of its employees or principals has any disciplinary information to report.

##### **Other Financial Industry Activities and Affiliations**

###### Broker-dealer

Neither the principal of Stony Point, nor any related persons are registered, or have an application pending to register, as a broker dealer or as an associated person of the foregoing entities.

###### Futures Commission Merchant/Commodity Trading Advisor

Neither members of management, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

###### Relationship with Related Persons

This item is not applicable.

### Recommendations of other Advisers

Stony Point does not utilize nor select other advisers or third party managers. All assets are managed by Stony Point management.

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

A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

- A. Not applicable. Stony Point does not recommend to clients that they invest in any security in which Stony Point or any principal thereof has any financial interest.
- B. On occasion, an employee of Stony Point may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.
- C. On occasion, an employee of Stony Point may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

### **Review of Accounts**

All accounts will be reviewed by a member of senior management on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts. Reviews may vary in focus specific to a client's specific situation but may include performance reviews, changes that have been made since the last review, changes in clients financial situation, current cash holdings, any known immediate need of investments, and risk tolerance. If a Client wishes to engage the Stony Point for an additional or ongoing review of their financial plan, each review may require a new financial planning agreement.

The annual report in writing provided by Stony Point is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from Schwab. Please refer to Item 15 of the Information Brochure regarding Custody.

## **Client Referrals and Other Compensation**

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – 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 and grow our business. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of Schwab's support services:

*Services that Benefit You.* Schwab's institutional brokerage 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 to which we might not otherwise have access 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 some 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:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist 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
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

## **Our Interest in Schwab's Services.**

The availability of the services described above (under the caption "Other Products and Services Available to Us from Schwab") from Schwab benefits us because we do not have to produce or purchase them. Schwab has agreed to pay for up to \$25,000 of certain marketing and technology products and services provided to us by third parties once the total of our clients' assets maintained in accounts at Schwab reaches \$65 million. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$65 million minimum described above may give us an incentive to require that you maintain your account with Schwab based on our interest in receiving Schwab's

and services and Schwab's payment for third party services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services and not Schwab's services and Schwab's payment for third party services that benefit only us. We have adopted policies and procedures designed to ensure, at account opening and thereafter, that our wrap fee program and our use of Schwab's services is appropriate for each of our clients.

#### Compensation to Non-Advisory Personnel for Client Referrals.

Stony Point does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

#### **Financial Information**

Stony Point does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

# **STONY POINT WEALTH MANAGEMENT INC.**

## **Privacy Notice**

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

### **INFORMATION WE COLLECT**

STONY POINT WEALTH MANAGEMENT INC. must collect certain personally identifiable financial information about its clients to ensure that it offers the highest quality financial services and products. The personally identifiable financial information which we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information collected through an Internet "cookie" (an information collecting device from a web server); and
4. information we receive from a consumer reporting agency.

### **INFORMATION WE DISCLOSE**

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. We do not disclose your personal information to any third party for the purpose of allowing that party to market other products to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

### **CONFIDENTIALITY AND SECURITY**

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.