



## **Great Oak Capital Partners, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: September 20, 2019**

This Form ADV2A ("Disclosure Brochure") provides information about the qualifications and business practices of Great Oak Capital Partners, LLC ("Great Oak" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (508) 230-7100.

Great Oak 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 through Great Oak to assist you in determining whether to retain the Advisor.

Additional information about Great Oak and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 281045.

#### **Great Oak Capital Partners, LLC**

105 Depot Street, Suite 5 South Easton, MA 02375	950 South Pine Island Road, Suite 150A Plantation, FL 33324
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<http://www.greatoakcp.com>

## Item 2 – Material Changes

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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 Great Oak. For convenience, we have combined these documents into a single disclosure document.

Great Oak believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Great Oak encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

The following material changes have been made to the Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has moved its main office location to 105R Depot Street, Suite 5, South Easton, MA 02375.
- The Advisor is now offering Wealth Management Services. Please see Items 4 and 5 for additional information.
- Item 10. Supervised Persons no longer offer Tax Services to Clients or are licensed insurance agents. Please see Item 10– Other Financial Industry Activities and Affiliations.
- The Advisor has updated their fee schedule for investment advisory services. Please see Item 5 for additional information.
- The Advisor is transitioning as a state registrant to a registrant with the U.S. Securities and Exchange Commission.

### Future Changes

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

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](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 281045. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (508) 230-7100.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Great Oak Capital Partners, LLC (“Great Oak” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Massachusetts. Great Oak was founded in June 2015 and is owned and operated by John R. Noonan III, CFP® (Principal and Chief Compliance Officer) and William R. Sylvia Jr., CFP® (Principal). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Great Oak.

### **B. Advisory Services Offered**

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

The Advisor acts as a fiduciary to its Clients, as defined under the applicable laws and regulations. As such, each recommendation made as part of the advisory services is based on the belief that the recommendation is in the Client's best interest. Our fiduciary commitment to each Client is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

Great Oak may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning and consulting services in connection with discretionary management of investment portfolios. These services are described below.

#### Investment Management Services

Great Oak provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and financial planning services. Great Oak 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 allocation. Great Oak will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client's investment goals. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Great Oak's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client. Great Oak will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client based on their meetings with the Advisor. 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.

Great Oak evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Great Oak recommends, on occasion: redistributing investment allocations to diversify the portfolio; adding specific positions to increase asset class weightings; 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.

At no time will Great Oak 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 Client investment advisory agreement. Please see Item 12 – Brokerage Practices.

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### Financial Planning Services

Great Oak will typically provide a variety of financial planning services to Clients, pursuant to the terms and scope of the financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Great Oak may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### Retirement Plan Advisory Services

Great Oak provides retirement plan advisory services to company retirement plans (each a "Plan") and the Plan's responsible party for the Plan (the "Plan Sponsor"). Great Oak provides its services to the Plan and Plan Sponsor on a non-discretionary basis (under ERISA Section 3(21)). Great Oak may provide the following Plan fiduciary services pursuant to the terms of the Advisor's agreement with the Plan and Plan Sponsor:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Monitoring
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Great Oak also provides Communication and Education to the Plan Participants, pursuant to the terms of the Advisor's agreement with each Plan Sponsor:

- Investment education
- Periodic on-site advisor visits with staff for account updates and reviews
- Periodic Plan Participant group education opportunities

### **C. Client Account Management**

Prior to engaging Great Oak to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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- Establishing an Investment Strategy – Great Oak, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Great Oak 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 – Great Oak will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Great Oak will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

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

#### **E. Assets Under Management**

As of April 18, 2019, Great Oak manages approximately \$103,000,000 in discretionary assets, \$6,500,000 in non-discretionary assets totaling \$109,500,000 in assets under management. Clients may request more current information at any time by contacting the Advisor.

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

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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 one or more agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Wealth Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the average daily closing value of assets under management at the end of the quarter. Investment advisory fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	1.00%
Next \$500,000 (Up to \$1,000,000)	0.75%
Next \$1,000,000 (Up to \$2,000,000)	0.65%
Next \$3,000,000 (Up to \$5,000,000)	0.50%
Over \$5,000,000	0.40%

Certain Clients may be grandfathered in on the old fee schedule. The investment advisory fee in the first quarter 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 Great Oak will be independently valued by the Custodian. Great Oak will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

##### Financial Planning Services

Great Oak offers financial planning or consulting services at an hourly rate of up to \$250 per hour or based on a fixed fee per engagement. The fixed rate is based on the expected number of hours to complete the engagement at the negotiated hourly rate. Fees may be negotiable depending on the nature and complexity of each Client's circumstances and the overall relationship with the Advisor. An estimate for total hours and/or cost will be provided to the Client prior to engaging for planning services.

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### Retirement Plan Advisory Services

Retirement plan advisory fees are typically paid quarterly, at the end of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are charged at the same rate as Wealth Management Services, or on a fixed negotiated fee. Fees are based on the market value of assets in the plan on the last day of the prior calendar quarter. Fees are negotiable based on the size and complexity of the services provided to the Plan.

## **B. Fee Billing**

### Wealth Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client account[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) based upon the market value of the average daily balance during the end of each calendar quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients provide written authorization permitting advisory fees to be deducted by Great Oak directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

### Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement with the remaining balance due upon receipt of the agreed upon deliverable[s].

### Retirement Plan Advisory Services

Fees may be deducted from the accounts of the Plan Participants or paid by the Plan Sponsor.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Great Oak, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by Great Oak are separate and distinct from these custody and execution fees.

In addition, all fees paid to Great Oak 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. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Great Oak 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**

### Wealth Management Services

Great Oak is compensated for its services at the end of the quarter after investment advisory 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 agreement within five (5) business days of signing the Advisor's investment advisory agreement at no cost to the Client. After the five-day period, the Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Client shall be billed for fees up to and including the effective date of termination. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.



### Financial Planning Services

Great Oak is often partially compensated for its financial planning services at the start of the engagement. Either party may terminate a financial planning services agreement, at any time, by providing advance written notice to the other party. In addition, the Client may also terminate the agreement within five (5) business days of signing the Advisor's financial planning 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. Any unearned, prepaid fees will be promptly refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

Either party may request to terminate their services with Great Oak, in whole or in part, by providing advance written notice to the other party. The Client shall be responsible for advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

Great Oak does not buy or sell securities and does not receive any compensation for securities transactions in any Client account[s], other than the investment advisory fees noted above.

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

Great Oak does not charge performance-based fees for its investment advisory services. The fees charged by Great Oak are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Great Oak 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**

Great Oak provides investment advisory services to individuals, high net worth individuals, trusts and estates. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Great Oak generally requires a minimum relationship size of \$500,000, 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**

Great Oak employs the Evidence-Based Investment Approach ("EBIA") in developing investment strategies for its Clients. The EBIA is grounded in decades of academia, science, and mathematics, and focuses on five principles: keeping costs low, diversifying, rebalancing, avoiding any form of market timing, and integrating "factors".

Great Oak analyzes mutual funds and exchange-traded funds recommended to Clients based on the funds' total operating expenses, portfolio turnover, investment objective and investment restrictions and limitations. The Advisor does not recommend individual stocks, bonds or actively managed mutual funds in its asset allocation strategies and portfolio recommendations to Clients.

Great Oak recommends that Clients invest in no-load institutional mutual funds and ETFs advised by Dimensional Fund Advisors (DFA), iShares and Vanguard. DFA funds generally are available for investment only by Clients of registered investment advisors, and all investments are subject to approval of the advisor. This means that you may not be able to make additional investments in DFA funds if you terminate your agreement with Great Oak, except through another adviser authorized by DFA.

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At times, Great Oak may also buy and sell positions that are more short-term in nature, depending on the goals of the Client.

## **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. Great Oak 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. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help 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 these methods of analysis may lose value and may have negative investment performance. More details on the Advisor's review process are included below in Item 13 – Review of Accounts. 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 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 strategy:

### 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. There is also a risk that Authorized Participants are unable to fulfill their responsibilities. Authorized Participants are one of the major parties involved with ETF creation/redemption mechanism in the markets. The Authorized Participants play a critical role in the liquidity of ETFs and essentially have the exclusive right to change the supply of ETF shares in the market. If the Authorized Participants does not fulfill this expected role, there could be an adverse impact on liquidity and the valuation of an ETF.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of mutual funds 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.

**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.**

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## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Great Oak or any of its Supervised Persons.** Great Oak values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 281045.

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

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Mr. McAuley, in his separate capacity, is a Certified Public Accountant and performs accounting, business consulting and tax services, through MDM Financial Solutions, Inc.

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

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### **A. Code of Ethics**

Great Oak has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Great Oak (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Great Oak and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Great Oak’s 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 our Code, please contact us at (508) 230-7100.

### **B. Personal Trading with Material Interest**

Great Oak allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Great Oak 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. Great Oak does not have a material interest in any securities traded in Client account[s].

### **C. Personal Trading in Same Securities as Clients**

Great Oak allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Great Oak may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially 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 Great Oak requiring reporting of personal securities trades by its Supervised Persons for review by the Supervised Person’s supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While Great Oak allows our 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 afterwards. **At no time will Great Oak, or any associated person of Great Oak, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Great Oak 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 Great Oak to direct trades to the Custodian as agreed upon in the investment advisory agreement.

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Further, Great Oak does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Great Oak does not exercise discretion over the selection of the Custodian, it will recommend the Custodian 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 Custodian not recommended by Great Oak. However, Great Oak, at its discretion, may not accept Clients who do not use the recommended Custodian. Great Oak may recommend the 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.

Great Oak recommends that Clients establish accounts at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"). TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and member FINRA/SIPC. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. The Advisor receives some benefits from TD Ameritrade through its participation in the program. Please see the disclosure under Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Great Oak does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from the Custodian. Please see Item 14 below. Great Oak is not required to effect transactions in a Client's account[s] to maintain these benefits.**

**2. Brokerage Referrals** - Great Oak 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 Great Oak will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective Account[s]. 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[s] from another Client's account[s]). Great Oak 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**

Although Great Oak does not aggregate or "batch" 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, considering such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Great Oak will execute each transaction through the Custodian designated by the Client. Great Oak will seek to execute securities transactions by the close of each business day and will 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 any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Investments in a Client's account[s] are monitored on a regular and continuous basis by the Principal Officers of Great Oak. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

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#### **Great Oak Capital Partners, LLC**

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## **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 Great Oak 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 also provides Clients with access to a Client portal, through which periodic reports regarding their holdings, allocations, and performance can be generated.

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

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### **A. Compensation Received by Great Oak**

Great Oak is a fee-only advisory firm that is compensated solely by the Client and not from any investment product. Great Oak does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Great Oak may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Great Oak may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### **B. Client Referrals from Solicitors**

Great Oak does not engage unaffiliated third-party referral sources (a "solicitor") for Client referrals.

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## **Item 15 – Custody**

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Great Oak does not accept or maintain custody of any Client account[s], 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 Great Oak to utilize the Custodian for the Client's security transactions. Great Oak encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

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Great Oak generally has discretion over the selection and amount of securities to be bought or sold in Client account[s] 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 Great Oak. 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 a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by Great Oak will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Great Oak does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Great Oak, nor its management, have any adverse financial situations that would reasonably impair the ability of Great Oak to meet all obligations to its Clients. Neither Great Oak, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Great Oak is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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## **Form ADV Part 2B – Brochure Supplement**

**for**

**John R. Noonan III, CFP®**  
**Principal and Chief Compliance Officer**

**Effective: September 20, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of John R. Noonan III, CFP® (CRD# **4163170**) in addition to the information contained in the Great Oak Capital Partners, LLC ("Great Oak" or the "Advisor") (CRD # 281045) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Great Oak Disclosure Brochure or this Brochure Supplement, please contact us at (508) 230-7100.

Additional information about Mr. Noonan is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# **4163170**.

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## Item 2 – Educational Background and Business Experience

John R. Noonan, born in 1976, is dedicated to advising Clients of Great Oak in his role as a Principal and the Chief Compliance Officer. Mr. Noonan earned a Bachelor of Arts in Biology from Boston University in 1998. Additional information regarding Mr. Noonan's employment history is included below.

### Employment History:

Principal and Chief Compliance Officer, Great Oak Capital Partners, LLC	07/2015 to Present
Financial Advisor, Lincoln Financial Advisors	02/2009 to 09/2015
Registered Representative, Lincoln Financial Securities Corporation	05/2009 to 04/2015

### About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

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

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Noonan.*** Mr. Noonan 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. Noonan.

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. Noonan.***

However, we do encourage you to independently view the background of Mr. Noonan on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4163170.

### Item 4 – Other Business Activities

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Mr. Noonan is dedicated to the investment advisory activities of Great Oak's Clients. Mr. Noonan does not have any other business activities.

### Item 5 – Additional Compensation

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Mr. Noonan is dedicated to the investment advisory activities of Great Oak's Clients. Mr. Noonan does not receive any additional forms of compensation.

### Item 6 – Supervision

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Mr. Noonan serves as a Principal and the Chief Compliance Officer of Great Oak. Mr. Noonan can be reached at (508) 230-7100.

Great Oak has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Great Oak. Further, Great Oak is subject to regulatory oversight by various agencies. These agencies require registration by Great Oak and its Supervised Persons. As a registered entity, Great Oak is subject to examinations by regulators, which may be announced or unannounced. Great Oak 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**

**William R. Sylvia Jr., CFP®  
Principal**

**Effective: September 20, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of William R. Sylvia Jr., CFP® (CRD# **5171182**) in addition to the information contained in the Great Oak Capital Partners, LLC ("Great Oak" or the "Advisor") (CRD # 281045) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Great Oak Disclosure Brochure or this Brochure Supplement, please contact us at (508) 230-7100.

Additional information about Mr. Sylvia is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5171182.

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## Item 2 – Educational Background and Business Experience

William R. Sylvia, born in 1982, is dedicated to advising Clients of Great Oak as a Principal of Great Oak. Mr. Sylvia earned a Bachelor of Arts in Finance with a concentration in Economics from Stonehill College in 2006. Additional information regarding Mr. Sylvia's employment history is included below.

### Employment History:

Principal, Great Oak Capital Partners, LLC	07/2015 to Present
Financial Advisor, LPL Financial LLC	02/2009 to 11/2015
Financial Advisor, Lincoln Financial Securities Corporation	07/2008 to 02/2009

### About the CFP® Designation

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP® Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

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

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Sylvia.*** Mr. Sylvia 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. Sylvia.

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. Sylvia.***

However, we do encourage you to independently view the background of Mr. Sylvia on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5171182.

### Item 4 – Other Business Activities

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Mr. Sylvia is dedicated to the investment advisory activities of Great Oak's Clients. Mr. Sylvia does not have any other business activities.

### Item 5 – Additional Compensation

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Mr. Sylvia is dedicated to the investment advisory activities of Great Oak's Clients. Mr. Sylvia does not receive any additional forms of compensation.

### Item 6 – Supervision

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Mr. Sylvia serves as a Principal of Great Oak and is supervised by John Noonan, the Chief Compliance Officer. John Noonan can be reached at (508) 230-7100.

Great Oak has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Great Oak. Further, Great Oak is subject to regulatory oversight by various agencies. These agencies require registration by Great Oak and its Supervised Persons. As a registered entity, Great Oak is subject to examinations by regulators, which may be announced or unannounced. Great Oak 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**

**Mark D. McAuley, CPA  
CPA**

**Effective: September 20, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Mark D. McAuley (CRD# 5977054) in addition to the information contained in the Great Oak Capital Partners, LLC ("Great Oak" or the "Advisor", CRD# 281045) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Great Oak Disclosure Brochure or this Brochure Supplement, please contact us at (508) 230-7100.

Additional information about Mr. McAuley is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5977054.

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## Item 2 – Educational Background and Business Experience

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Mark D. McAuley, born in 1980, is dedicated to advising Clients of Great Oak as a CPA. Mr. McAuley earned a B.S. in Accounting Information Systems from Bryant University in 2002. Additional information regarding Mr. McAuley's employment history is included below.

### Employment History:

CPA, Great Oak Capital Partners, LLC	01/2019 to Present
Manager, MDM Financial Strategies LLC	09/2012 to Present
President, MDM Financial Solutions, Inc	09/2011 to Present
Investment Advisor Representative, EquityTrust	09/2011 to 01/2013
Accountant, Sharkansky LLP	06/2005 to 12/2013
Accountant, PriceWaterhouseCoopers LLP	10/2002 to 06/2005

### Certified Public Accountant ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. McAuley.*** Mr. McAuley 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. McAuley.

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. McAuley.***

However, we do encourage you to independently view the background of Mr. McAuley on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5977054.

## Item 4 – Other Business Activities

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Mr. McAuley will continue to be the Manager of MDM Financial Strategies LLC, while clients are transferred over to Great Oak.

Mr. McAuley, in his separate capacity, is a Certified Public Accountant and performs accounting, business consulting and tax services, through MDM Financial Solutions, Inc.

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## **Item 5 – Additional Compensation**

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

## **Item 6 – Supervision**

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Mr. McAuley serves as the CPA of Great Oak and is supervised by John Noonan, the Chief Compliance Officer. John Noonan can be reached at (508) 230-7100.

Great Oak has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Great Oak. Further, Great Oak is subject to regulatory oversight by various agencies. These agencies require registration by Great Oak and its Supervised Persons. As a registered entity, Great Oak is subject to examinations by regulators, which may be announced or unannounced. Great Oak 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.



## Privacy Policy

Effective: September 20, 2019

### Our Commitment to You

Great Oak Capital Partners, LLC ("Great Oak" 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. Great Oak (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.

Great Oak 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?

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.

### 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.

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Great Oak Capital Partners, LLC

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Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> Great Oak 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 Great Oak or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> Great Oak 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

Massachusetts	In response to a Massachusetts law, Clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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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 (508) 230-7100.

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#### Great Oak Capital Partners, LLC

105R Depot Street, Suite 5, South Easton, MA 02375 \* 950 South Pine Island Road, Suite 150A, Plantation, FL 33324

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