

FORM ADV**Part II – Page 1 Uniform Application for Investment Adviser Registration**

Name of Investment Adviser: Equus Private Wealth Management LLC		
Address: 225 Main Street Suite #306 Carbondale, Colorado 81623	Area Code: 970	Telephone Number 963 9254

This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.

Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Advisory Services and Fees	2
2	Types of Clients	2
3	Types of Investments	3
4	Methods of Analysis, Sources of Information and Investment Strategies	3
5	Education and Business Standards	4
6	Education and Business Background	4
7	Other Business Activities	4
8	Other Financial Industry Activities or Affiliations	4
9	Participation or Interest in Client Transactions	5
10	Conditions for Managing Accounts	5
11	Review of Accounts	5
12	Investment or Brokerage Discretion	6
13	Additional Compensation	6
14	Balance Sheet	6
	Continuation Sheet	Schedule F
	Balance Sheet, if required	Schedule G

(Schedules A,B,C,D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients)

Potential persons who are to respond to the collection of information contained in this form
Are not required to respond unless the form displays a currently valid OMB control number

1. A Advisory Service and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services	100 %
<input type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services	%
<input type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above	%
<input type="checkbox"/>	(4)	Issues periodicals about securities by subscription	%
<input type="checkbox"/>	(5)	Issues special reports about securities not included in any service described above	%
<input type="checkbox"/>	(6)	Issues, not as part of any service described above, any charts, graphs, formulas, or other devices, which clients may use to evaluate securities	%
<input type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities	%
<input type="checkbox"/>	(8)	Provides a timing service	%
<input type="checkbox"/>	(9)	Furnishes advice about securities in any manner not described above	%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state the percentages are estimates.)

B Does applicant call any of its services it checked above financial planning or some similar term?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

C Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/>	(1)	A percentage of assets under management	<input type="checkbox"/>	(4)	Subscription fees
<input type="checkbox"/>	(2)	Hourly Charges	<input type="checkbox"/>	(5)	Commissions
<input type="checkbox"/>	(3)	Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6)	Other

D For each checked box in A above, describe on Schedule F:

- The services provided, including the name of any publications or report issued by the adviser on a subscription basis of for a fee
- Applicants basic fee schedule, how fees are charged and whether its fees are negotiable
- When compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients – Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/>	A.	Individuals	<input checked="" type="checkbox"/>	E.	Trusts, estates, or charitable organizations
<input type="checkbox"/>	B.	Banks or Thrift Institutions	<input checked="" type="checkbox"/>	F.	Corporations or business entities other than those listed above
<input type="checkbox"/>	C.	Investment Companies	<input type="checkbox"/>	G.	Other
<input checked="" type="checkbox"/>	D.	Pension and profit sharing plans			

3. **Types of Investments . Applicant offers advice on the following: (check those that apply)**

- | | | |
|---|---|---|
| A. Equity Securities | <input checked="" type="checkbox"/> | H. United States government securities |
| <input type="checkbox"/> (1) Exchange listed securities | | I. Options contracts on: |
| <input type="checkbox"/> (2) Securities traded over the counter | <input type="checkbox"/> (1) securities | |
| <input type="checkbox"/> (3) Foreign issuers | <input type="checkbox"/> (2) commodities | |
| <input type="checkbox"/> B. Warrants | | J. Futures contracts on |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) Tangibles | |
| <input checked="" type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) Intangibles | |
| <input checked="" type="checkbox"/> E. Certificates of Deposit | | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal Securities | <input checked="" type="checkbox"/> (1) Real Estate | |
| G. Investment Company Securities | <input checked="" type="checkbox"/> (2) Oil and Gas Interests | |
| <input type="checkbox"/> (1) Variable Life Insurance | <input type="checkbox"/> (3) Other (explain on Schedule F) | |
| <input type="checkbox"/> (2) Variable Annuities | | L. Other (explain on Schedule F) |
| <input type="checkbox"/> (3) Mutual Fund Shares | | |

4. **Methods of Analysis, Sources of Information and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial Newspapers and Magazines | (5) <input type="checkbox"/> Timing Services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual Reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered Options, or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short Sales | |

Form ADV
Part II – Page 4

Applicant
Equus Private Wealth Management LLC

SEC File Number:
801-68046

Date:

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? yes ☐ no ☒

(If yes, describe these standards on Schedule F)

6. Education and Business Background.

For:

- Each member of the investment committee or group that determines general investment advice to be given to clients, or
- If the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- Each principal executive officer or applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|---|
| • name | • Formal education after high school |
| • Year of birth | • Business background for the proceeding five years |

7. Other Business Activities (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(for each checked box describe the other activities, including the time spent on them, Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) Broker-dealer | <input type="checkbox"/> (7) Accounting firm |
| <input type="checkbox"/> (2) Investment company | <input type="checkbox"/> (8) Law firm |
| <input type="checkbox"/> (3) Other investment adviser | <input type="checkbox"/> (9) Insurance company or agency |
| <input type="checkbox"/> (4) Financial planning firm | <input type="checkbox"/> (10) Pension consultant |
| <input type="checkbox"/> (5) Commodity pool operator, commodity trading Adviser or futures commission merchant | <input type="checkbox"/> (11) Real estate broker or dealer |
| <input type="checkbox"/> (6) Banking or thrift institution | <input type="checkbox"/> (12) Entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest Yes ☐ No ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

{00470924 / 2}

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

9. **Participation or interest in Client Transactions**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any clients
- ☐ B. As broker or agent effects securities transactions for compensation for any client
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and What restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. **Conditions for managing accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes ☒ No ☐

11. **Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself Out as providing financial planning or similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. For reviews, include their frequency, different levels, and triggering factors. For reviewers, include the number of reviews, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Each client account will be reviewed quarterly by Ronald V. Speaker, the founder of Equus Private Wealth Management LLC. Topics covered during such reviews include portfolio composition, performance, income generation, significant portfolio changes and highlights of individual security performance. Each review will also cover client goals and any changes to client portfolio goals. General themes discussed will cover the current state of the bond market and overall economic performance. Each client is encouraged to contact Mr. Speaker when any market concerns develop. Due to limited number of clients targeted by Equus Private Wealth Management LLC, consistent client contact will be a priority.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients should expect monthly reports detailing their accounts. This will include portfolio composition, performance summaries, monthly transaction reports and income generation measurements.

12. **Investment or Brokerage Discretion**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| (1) Securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) Amount of the securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) Broker or dealer to be used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) Commission rates paid? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients ☐ Yes ☒ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the Reasonableness of their commissions. If the value of products, research and services given to the Applicant or a related person is a factor describe

- The products, research and services
- Whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- Whether research is used to service all of applicants accounts or just those accounts paying for it, and
- Any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. **Additional Compensation**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| A Is paid cash by or receives some economic benefit (including commissions, equipment or non-research Services) from a non-client in connection with giving advice to clients? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| B. Directly or indirectly compensates any person for client referrals | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. **Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- Has custody of client funds or securities; or
- Requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet ☐ Yes ☒ No

Applicant Equus Private Wealth Management LLC	SEC File Number: 801-68046	Date:
---	-------------------------------	-------

Do not use this Schedule as a continuation for Form ADV Part I or any other schedules)

1.	Full name of applicant as stated in Item 1 A of Part I of Form ADV: Equus Private Wealth Management LLC	IRS Empl. Ident. No: 208879922
Item of Form (identity)	Answer	
1D	<p>Fees are charged at a fixed rate on the assets under management, as follows:</p> <p>Basic fee schedule \$5mm to \$25mm = 0.50% \$25mm to \$50mm = 0.40% \$50mm to \$100mm = 0.30% \$100mm to \$500mm = 0.20% \$500mm to \$1,000+ = 0.15%</p> <p>Management fees are due monthly in arrears based on the value of the assets on the last day of the calendar of the previous month, pursuant to a monthly bill on which is show the amount of the fee, how it was calculated and the value of the assets used to calculate the fee. Fees are not negotiable. Clients may terminate their relationship with Equus at any time. Fees will be due based on the number of days of service provided prior to receipt of notice of termination.</p>	
5D	<p>A minimum of 5 years of relevant investment experience is required for anyone giving investment advice from Equus Private Wealth. Ronald V. Speaker is the sole advisor providing services for Equus and has over 21 years of investment experience.</p>	
6	<p>Ronald V. Speaker, born October 24th, 1964. Graduate of the University of Colorado. Business Administration with a major in Finance. Chartered Financial Analyst since 1991 and a member of the Denver Society of Financial Analyst.</p> <p>Mr. Speaker spent the past 21 years with Janus Capital Group with several roles but primarily as the portfolio manager of the Janus Flexible Bond Fund and a manager of individual private accounts focused on fixed income securities. Mr. Speaker had previously managed the Janus Federal Tax Exempt fund, the Janus High Yield fund, Janus Intermediate Government Securities fund, Janus Short Term Bond fund and WRL Bond fund.</p>	
9E	<p>Individuals associated with Equus may trade securities for their own accounts which Equus may also recommend to its clients. Equus has a fiduciary relationship with its clients and requires that the clients' interest are put ahead of Equus and individuals associated with Equus. Equus recognizes that personal securities transactions may be construed as a conflict of interest, and therefore, and potential conflicts must be reported and reviewed by Equus prior to consummation. Moreover, Equus has a policy of reviewing all personal securities transactions on a quarterly basis to ensure that clients are receiving suitable advice.</p>	
12	<p>Equus is authorized to purchase and sell securities consistent with client's stated investment objectives and risk tolerance. Equus will use brokers that provide the best execution for client transactions and consistent liquidity. In certain instances brokers that are providing the best idea generation and research support may be given priority over the absolute best execution if Equus feels it will benefit the clients in the longer term.</p> <p>The commission rates in most fixed income securities are imbedded in price. Equus will strive for the best overall execution considering the factor mentioned above.</p>	