

Last Updated: July 1, 2015

# FORM ADV PARTS 2A & 2B



**JFS Wealth Advisors**



# JFS Wealth Advisors

## BROCHURE

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This Brochure provides information about the qualifications and business practices of JFS Wealth Advisors, LLC “JFS”. If you have any questions about the contents of this Brochure, please contact us at 724-962-3200 or [info@jfswa.com](mailto:info@jfswa.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.

JFS Wealth Advisors, LLC is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about JFS Wealth Advisors, LLC is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

Please note that the following summary addresses only material changes since the last annual update of JFS Wealth Advisors' brochure, which was dated March 31, 2015.

- There were no material changes to JFS' brochure since the last annual update for those who were clients of JFS Wealth Advisors, LLC prior to July 1, 2015.
- This Form ADV Part 2A now serves as the current and only Form ADV Part 2A for the clients of the former Weathervane Wealth Management, LLC (WWM).

Therefore, former WWM clients are encouraged to read this Form ADV Part 2 in its entirety as all of the changes from the prior firm cannot be summarized under this Item 2.

### **The following items highlight the firm name, ownership, and management changes impacting clients of the former Weathervane Wealth Management, LLC .**

- On July 1, 2015, the personal goodwill of Thomas D. Paulus, principal of WWM, was acquired by, and is now fully owned by, JFS Wealth Advisors, LLC.
- Prior to July 1, 2015, WWM was owned and managed by Thomas D. Paulus.
- The management team of the combined firm is comprised of the following, all of whom have an ownership interest in the firm.
  - Robert C. Jazwinski (President, Managing Principal)
  - Laura J. Blaire (Chief Operating Officer, Chief Compliance Officer, Managing Principal)
  - Janet J. Earle (Chief Financial Officer, Managing Principal)
  - J. Stephen Lee (Managing Principal, Senior Lead Advisor)
  - Thomas D. Paulus (Managing Principal, Senior Lead Advisor)
- Thomas D. Paulus will continue to manage the office at 1055 Westlakes Drive, 3rd Floor, Berwyn, PA 19312.
- Minor changes to Fees and Compensation were made to incorporate the fee schedules of existing clients of WWM.

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We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com). Our Brochure is also available on our website, [www.jfswa.com](http://www.jfswa.com), also free of charge.

Additional information about JFS Wealth Advisors, LLC is also available via the SEC's website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with JFS Wealth Advisors, LLC (JFS) who are registered, or are required to be registered, as investment adviser representatives of JFS.

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## **Brochure Supplement (Part 2B of Form ADV)**

Education and Business Standards

Professional Credentials

Robert C. Jazwinski Biographical Information

Sarah J. Amey Biographical Information

Karen L. Chikosky Biographical Information

Gary A. Dalessandro Biographical Information

Aaron K. Dayton Biographical Information

J. Stephen Lee Biographical Information

Amanda L. Marcello Biographical Information

Thomas D. Paulus Biographical Information

Deborah A. Stiger Biographical Information

Joseph J. Virostek Biographical Information

Thomas D. Wilson Biographical Information

Ronald W. Yost Biographical Information

## **Item 4 – Advisory Business**

JFS Wealth Advisors, LLC (JFS), successor to the firm founded in 1986, is part of the Focus Financial Partners, LLC (Focus) network. As such, JFS is a wholly-owned subsidiary of Focus Operating, LLC, which is a wholly-owned subsidiary of Focus Financial Partners, LLC.

### **Wealth Management Services (WM)**

Wealth Management Services include continuous investment management and personal financial planning.

JFS Wealth Advisors, LLC provides continual advice to a client regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, JFS develops a Financial Goal Plan and creates and manages a portfolio based on the Plan. JFS will manage advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the stated objectives of the client.

A Financial Goal Plan is developed to determine the appropriate investments, investment timeframes, and levels of risk. The Plan is developed as follows:

- Gather client information.
- Consult with the client to determine goals and objectives.
- Review basic financial data, which may include overviews of assets and liabilities, cash flow, tax situation, short-term events, long-term goals, risk management, and estate structures.
- Identify the need for additional professional advice, such as legal, tax, accounting, etc.

A client may decide to complete a Financial Goal Plan in phases rather than complete a full Plan at one time. The typical areas of a Plan are investment planning, retirement planning, cash flow analysis and budgeting, risk assessment and insurance needs analysis, tax planning, estate planning, and education planning.

A client may impose restrictions on the types of securities included in the portfolio (ex. use only socially responsible securities). However, most clients do not impose restrictions nor do we suggest that they do.

The primary custodians used for client accounts are Charles Schwab & Co., Inc., TD Ameritrade Institutional, National Advisors Trust Co., and Fidelity Investments. Client accounts are typically invested in no load mutual funds or Exchange Traded Funds (ETF's) although other securities may be used depending upon the unique needs, circumstances, and risk tolerance of the individual client.

### **Investment Advisory Services (IAS)**

For those individuals who do not wish to engage JFS for the Wealth Management Services referenced above, JFS offers its Investment Advisory Services (IAS) platform.

Under IAS, the client receives services limited to JFS' allocation (and automatic rebalancing) of the client's assets typically among various mutual funds or ETF's consistent with the client's investment objectives. JFS also provides retirement planning.

JFS remains available to provide personal financial planning and consulting services on a fixed fee basis upon client request.

### **Financial Planning Services**

JFS provides advice on investment planning, retirement planning, cash flow analysis and budgeting, risk assessment and insurance needs analysis, tax planning, estate planning, and education planning. Financial planning services are typically provided in the form of a Financial Goal Plan. While a Financial Goal Plan is typically comprehensive in nature, JFS will focus on specific financial planning topics based on the client's request and unique needs. Specific services are agreed upon in advance. Clients are engaged under a specific engagement letter that details the nature of the services and the fixed fee amount. These engagement letters may be terminated by the client without penalty by giving written notice of termination within five business days of executing a contract for services. The fixed fee is non-negotiable and non-refundable after the five-day grace period and is payable in full upon completion of contracted services.

### **Tax Preparation Services**

JFS offers to provide tax return preparation services to its clients on a fixed fee basis. The fixed price depends upon the professional providing the service and the complexity of the return. Clients are engaged under a specific engagement letter that details the nature of the services and the fixed fee amount. These engagement letters may be terminated by the client without penalty by giving written notice of termination within five business days of executing a contract for services. The fixed fee is non-negotiable and non-refundable after the five-day grace period and is payable in full upon completion of contracted services.

### **Advisory Services**

JFS may provide investment advice as a part of Financial Goal Plans issued to clients. The advice is general in nature and includes guidance on asset allocation strategies and alternatives to achieve strategies. Fees for this service are charged on a fixed fee basis. Clients are engaged under a specific engagement letter that details the nature of the services and the fixed fee amount. These engagement letters may be terminated by the client without penalty by giving written notice of termination within five business days of executing a contract for services. The fixed fee is non-negotiable and non-refundable after the five-day grace period and is payable in full upon completion of contracted services.

### **Consulting Services**

JFS provides other services for clients, as requested, on a fixed price basis. These services may include, but are not limited to business consulting and strategy, periodic investment reviews, and benefit plan analysis. Clients are engaged under a specific engagement letter that details the nature of the services and the fixed fee amount. These engagement letters may be terminated by the client without penalty by giving written notice of termination within five business days of executing a contract for services. The fixed fee is non-negotiable and non-refundable after the five-day grace period and is payable in full upon completion of contracted services.

### **Business Retirement Plan Consulting Services and Business Retirement Plan Advisory Services**

JFS assists retirement plan sponsors with retirement plan design, group and individual employee education and counseling, investment strategy selection, and monitoring. JFS and the plan sponsor share the fiduciary role and serve as "co-fiduciaries." Custodians of retirement plan Trustee



accounts and retirement plan participant accounts include Charles Schwab & Co., Inc., TD Ameritrade Institutional, TD Ameritrade Trust Company, and National Advisors Trust Co.

JFS' Business Retirement Plan Consulting Services and Business Retirement Plan Advisory Services are fee-based, and clients are engaged under a specific contract for services. These contracts may be terminated by the client without penalty by giving written notice of termination within five business days of executing a contract for services. After the five-day period, a client may terminate the agreement at any time with 30 days written notice.

### **Wrap Fee Programs**

JFS may have clients who participate in wrap fee programs. In such instances, JFS provides advice through consultations by providing clients with access to independent money management firms through the wrap-fee programs offered by Lockwood Advisors, Inc. (LAI), Schwab and/or TD Ameritrade. Each of these firms is a broker-dealer, and none of these firms is affiliated with JFS.

Factors JFS considers in choosing independent managers include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research. Based on this information, the Lead Advisor, with assistance from the Investment Committee, will select from among the independent investment advisers participating in the respective wrap programs those advisers whose investment objectives and philosophies are consistent with those of the client.

JFS will periodically review and update a client's financial circumstances and investment objectives. When appropriate, JFS may recommend the replacement of one investment manager with another.

Lockwood, Schwab, and TD Ameritrade will continually monitor the investment manager firms participating in their respective wrap programs.

### **Miscellaneous**

#### **Non-Discretionary Service Limitations**

Clients who decide to engage JFS on a non-discretionary investment management or advisory basis must be willing to accept that JFS cannot effect any account transactions without obtaining prior written or verbal consent to any such transactions from the client. Accordingly, in the event of a market correction during which the client is unavailable, JFS will be unable to effect any account transactions (as it would for its discretionary clients) without first obtaining the client's written or verbal consent.

#### **Client Obligations**

Each client retains the responsibility to promptly notify JFS if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, and/or revising JFS' previous recommendations or services.

When performing requested services, JFS will not be required to verify any information received from the client or from the client's other professionals. JFS is expressly authorized to rely on such information.

#### **Financial Planning and Non-Investment Consulting/Implementation Services**

Neither JFS, nor any of its employees, serves as an attorney. Accordingly, none of JFS' services should be viewed as those provided by an attorney.

When requested by a client, JFS may recommend the services of other professionals for the implementation of certain financial planning recommendations or other non-investment implementation purposes (ex. attorneys, accountants, insurance agents/agencies, etc.), including JFS' related licensed insurance entity. Clients are under no obligation to engage the services of any recommended professional. Clients retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from JFS.

If any client engages a recommended professional, and a dispute arises afterward relative to that engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

### **Conflict of Interest**

The recommendation by JFS that a client purchase an insurance commission product from JFS' related insurance entity, JFS Risk Management, LLC, presents a conflict of interest. The receipt of commissions by JFS Risk Management, LLC may provide an incentive to recommend insurance products based on commissions to be received rather than on a particular client's need. However, JFS does have a duty at all times to act in the client's best interest.

No client is under any obligation to purchase any insurance commission product from JFS' related insurance entity. Clients are reminded that they may purchase insurance products recommended by JFS through other, non-related insurance agencies. JFS' Chief Compliance Officer, Laura Blaire, remains available to address any questions that clients or prospective clients may have regarding this or any other conflict of interest.

### **Class Actions, Bankruptcies, and Other Legal Proceedings**

JFS is available to advise and assist clients relative to legal proceedings involving companies whose securities are held or previously were held in the client's account(s). These include, but are not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct JFS to transmit copies of class action notices to the client or a third party. Upon such direction, JFS will make reasonable efforts to forward such notices in a timely manner. Clients retain the ultimate responsibility for responding to such legal notices.

### **Assets Under Management**

JFS manages \$1,284,385,281 in client assets as of December 31, 2014 of which \$1,098,300,568 are discretionary and \$186,084,713 are non-discretionary.

### **Additional Practices**

JFS provides prospective and new clients with JFS' Privacy Statement, which details JFS' commitment to protecting nonpublic personal client information. JFS does not share nonpublic client information with affiliates or other parties unless authorized by the client to do so or required by law. JFS also provides all clients with a copy of the Privacy Statement annually.

JFS maintains a Business Continuity Plan (BCP), which is reviewed, tested, and updated periodically. The BCP is designed to ensure that JFS is able to resume business functions as quickly as possible in the event of a natural or manmade emergency.

JFS designed and implemented Compliance Processes and Procedures as part of developing its overall Compliance Program. These processes and procedures include, but are not limited to:

Portfolio Management, Investment Trading, Proprietary Trading, Disclosures, Safeguarding Client Assets, Recordkeeping, Marketing/Advertising, Valuation of Securities, Privacy, and a Business Continuity Plan. JFS also maintains an Insider Trading Policy and Code of Ethics, which all employees must review and acknowledge in writing no less than annually. JFS reviews and updates these “living” documents periodically to ensure the processes and procedures remain current and accurate. JFS conducts an Annual Review of the Compliance Program, which is reviewed and approved by the Chief Compliance Officer. JFS also provides periodic staff training to ensure employees remain current and informed regarding compliance requirements.

JFS strives to instill and maintain a culture of compliance throughout the firm.

## **Item 5 – Fees and Compensation**

### **FEE SCHEDULES**

Wealth Management Services, Investment Advisory Services, and Business Retirement Plan Services are fee-based, and clients are engaged under a specific contract for services. These contracts may be terminated by the client without penalty by giving written notice of termination within five business days. After the five-day period, clients may terminate the agreement at any time with a thirty day written notice, and fees due will be prorated to the effective date of termination.

**The annual fee for Wealth Management (WM) Services** will be charged as a percentage of assets under management generally not to exceed 1.25%. The most typical fee is the following CUMULATIVE schedule:

- 1.0% of first \$1,000,000 of assets, plus
- 0.9% of next \$1,000,000, plus
- 0.8% of next \$1,000,000, plus
- 0.7% of next \$1,000,000, plus
- 0.6% on assets greater than \$4,000,000
- Minimum \$1,500 per quarter

**The annual fee for Investment Advisory Services (IAS)** will be charged as a percentage of assets under management according to the following schedule:

- 1.25% of assets
- Minimum \$250 per quarter

**The annual fee for Business Retirement Plan Services** will be charged as a percentage of assets under management generally not to exceed 1.25%. The most typical fee is the following applicable CUMULATIVE schedule:

#### Consulting Services

- 1.0% of first \$1,000,000 of assets, plus
- 0.9% of next \$1,000,000, plus
- 0.8% of next \$1,000,000, plus
- 0.7% of next \$1,000,000, plus

0.6% on assets greater than \$4,000,000  
Minimum \$1,500 per quarter

Advisory Services - Advisor Directed, Pooled Accounts

1.0% of first \$1,000,000 of assets, plus  
0.9% of next \$1,000,000, plus  
0.8% of next \$1,000,000, plus  
0.7% of next \$1,000,000, plus  
0.6% on assets greater than \$4,000,000  
Minimum \$1,500 per quarter

Advisory Services - Advisor Directed SIMPLE IRA or SEP IRA or Separately Managed Accounts

1.0% of first \$1,000,000 of assets, plus  
0.9% of next \$1,000,000, plus  
0.8% of next \$1,000,000, plus  
0.7% of next \$1,000,000, plus  
0.6% on assets greater than \$4,000,000  
Minimum \$1,500 per quarter

## **Billing**

The specific way in which fees are charged by JFS is detailed in the client's specific contract with JFS.

Typically, JFS' advisory fees are billed quarterly in advance based upon the market value of the assets on the last business day of the previous quarter unless otherwise specified in the client's advisory contract. JFS' advisory fee is prorated, if applicable.

Clients may elect to be billed for services or to have fees directly debited from their account(s).

## **Fixed Price Agreements**

The following services are provided on a fixed price basis and are billed at the completion of the service or client engagement or as detailed in the client's agreement. The fixed price amount is based upon the requested services, the professional(s) providing the services, and the complexity of the engagement.

- Financial Planning Services, including Tax Planning Services
- Tax Return Preparation Services\*
- Advisory Services
- Consulting Services
- Other Services, including Trust and Estate Administration Services, As Requested and Mutually Agreed Upon

\* At the exclusive discretion of JFS, tax return preparation services may be included for certain clients as part of their annual fee for Wealth Management Services.

## **Wrap Fee Programs**

All fees paid to JFS for wrap fee programs through any wrap fee program sponsors are credited towards the participating client's advisory fees. The investment management fees charged by the designated independent manager(s), together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, JFS' investment management or investment advisory fees, which are listed above. In addition, to the extent that an independent manager purchases mutual funds for a client's account, the account will also incur charges imposed directly at the mutual fund level (i.e., advisory fees and other fund expenses).

Fees for wrap fee program accounts vary based on several factors, including but not limited to, account size. Clients should refer to the respective Appendix 1 provided by Lockwood, Schwab, or TD Ameritrade for further details. The fees associated with the wrap fee programs do not include JFS' advisory fee.

Clients should carefully review the disclosure document provided by the wrap fee sponsor and the disclosure document provided by the manager(s) selected by the client for full information on brokerage services and fees.

The fees and account minimums for each wrap fee program are disclosed in the respective program's disclosure document. All fees are paid to Lockwood, Schwab, or TD Ameritrade, which then compensates JFS and the investment manager(s) selected by a client for their services. Clients should review the termination and refund policies for the wrap fee program, which are available in the respective brochures. JFS receives its normal fee schedule, which depends on the service and asset levels of the program participant.

In the event that JFS is engaged to provide investment management services as part of an unaffiliated wrap fee program, JFS will be unable to negotiate commissions and/or transaction costs. Under a wrap program, the wrap program sponsor arranges for the investor participant to receive investment advisory services, the execution of securities brokerage transactions, custody, and reporting services for a single specified fee. Participation in a wrap program may cost the participant more or less than purchasing such services separately. In the event that JFS is engaged to provide investment management services as part of an unaffiliated managed account program, JFS will likewise be unable to negotiate commissions and/or transaction costs. If the program is offered on a non-wrap basis, the program sponsor will determine the broker-dealer through which transactions must be effected and the amount of transaction fees and/or commissions to be charged to the participant investor's accounts.

## **GENERAL INFORMATION ON FEES & SERVICES**

### **Negotiability of Fees**

In certain circumstances, all of JFS' fees may be negotiable.

The fee schedule for each client is detailed in the advisory contract for that client. Fees are discussed with each client and mutually agreed upon before execution of the advisory contract.

### **Fee Calculation**

The advisory fee for Wealth Management Services and Investment Advisory Services are detailed above. The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (Section 205(a) (1) of the Investment Advisers Act of 1940).

The services above may be provided on a fixed price basis depending upon the services requested and the unique needs of the client. The fixed price is agreed upon in advance and is detailed in the specific contract for the services.

### **Account Minimums**

JFS generally requires a \$600,000 aggregate account minimum for Wealth Management Services. However, JFS, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its account minimum based on certain criteria (ex. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, etc.).

JFS does not typically enforce an account minimum for Business Retirement Plan Services.

### **Termination of Advisory Relationship**

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days prior written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. In the event of withdrawal of funds or the termination of any account, any fees or other expenses associated with rebalancing or liquidating the account holdings may be assessed to the client's account or billed.

From time to time, small portions of positions will be sold to bring the cash account balance to the level required for automatic deduction of fees. It is understood that the payment of these fees will reduce the total investment return.

Clients will incur additional transaction costs related to specific investments. JFS neither receives nor shares in any portion of these costs. In the case of individual stocks, bonds, closed-end and open-end investment companies, options, and the like, there may be costs charged directly by the custodian or clearing broker-dealer. The costs may include transaction fees.

All fees paid to JFS for advisory services (ex. Wealth Management Services, Investment Advisory Services, Business Retirement Plan Services, etc.) are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. JFS believes these costs are unavoidable, but it strives to select funds with low or competitive expense structures. In large part, "no-load" funds are selected. Some funds that are usually distributed through stockbrokers with commission charges may be purchased by JFS without commissions. Some funds also offer "I" or "Institutional, Advisor" classes of shares that are not usually available to the general public. These types of shares offer clients internal costs slightly reduced from those of "public" shares.

When deemed cost effective, JFS strives to purchase these lower cost shares, if they are available and comparable to "public" shares. In no instance does JFS receive any portion of mutual fund fees, costs, or any "soft-dollar" benefits from any mutual fund. A client could invest in certain mutual funds directly, without the services of JFS. In that case, the client would not receive the services provided by JFS which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to the client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by JFS to fully understand the total amount of fees to be paid by the client and to evaluate the advisory services being provided.

When beneficial to a client, individual equity and/or fixed income transactions may be effected through broker-dealers with whom JFS and/or the client have entered into arrangements for prime brokerage clearing services. This includes effecting certain transactions through other SEC registered and FINRA member broker-dealers. In these instances, the client generally will incur both the transaction fee charged by the executing broker-dealer and a "tradeaway" fee charged by the account custodian.

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

JFS does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of a client's assets).

#### **Item 7 – Types of Clients**

JFS provides services to individuals, high net worth individuals, trusts, estates, pension and profit sharing plans, charitable organizations and foundations, businesses, and municipal government entities.

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

Robert C. Jazwinski, President and Chairman of the Investment Committee works with Co-Chair J. Stephen Lee and Investment Committee members to conduct fundamental analysis on securities recommended for client accounts. Investment Committee members include all Lead Advisors. This analysis varies depending on the security in question.

For stocks and bonds the analysis generally includes a review of:

- The issuer's management;
- The amount and volatility of past profits or losses;
- The issuer's assets and liabilities, as well as any material changes from historical norms;
- Prospects for the issuer's industry, as well as the issuer's competitive position within that industry;
- Credit ratings;
- Income potential; and
- Any other factors considered relevant.

For mutual funds and ETFs the analysis generally includes a review of:

- The fund's management team;
- The fund's historical risk and return characteristics;
- The fund's exposure to sectors and individual issuers;
- The fund's fee structure;
- The fund's management style;
- The fund's investment philosophy;
- The fund's total assets under management;
- The fund's style consistency;
- The fund's risk adjusted performance relative to peers;
- The fund's regulatory oversight; and
- Any other factors considered relevant.

The Investment Committee generally meets no less than quarterly to discuss existing and prospective investments. Investments are evaluated independently, as well as in the context of clients' existing holdings and sector exposures.

JFS primarily invests for relatively long time horizons, normally for a year or more. However, market developments could cause JFS to sell securities more quickly.

Depending on a client's investment objectives, JFS might engage in short selling or option transactions. All investing involves a risk of loss; however, the use of short selling and option writing poses additional risks that are discussed in detail with any clients who are considering the use of these investment vehicles.

All investing involves a risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk. Clients should not assume that future performance of any specific investment or investment strategy, including those recommended or undertaken by JFS, will be profitable or equal any specific performance levels.

## **Item 9 – Disciplinary Information**

JFS Wealth Advisors, LLC and its employees have no reportable disciplinary history.

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

### **Other Business Activities**

In addition to the services listed in Item 4, JFS also provides certain accounting-related services (ex. journal entries, payroll review, etc.), although JFS is not an accounting firm.

JFS may recommend itself to an advisory client who needs these services, provided that the recommendation is consistent with JFS' fiduciary duties to the client. If a client decides to hire JFS to provide these services, the fees for these services are entirely separate and distinct from advisory fees charged by JFS. No advisory client is obligated to use JFS to provide any additional services.



JFS' President, Robert C. Jazwinski, is a member of the board of directors and trustees and Chair of the Investment Committee of Westminster College. He is a trustee of the F.H. Buhl Trust and is an Emeritus Director of Penn-Northwest Development Corp. and the Community Foundation of Western Pennsylvania and Eastern Ohio. None of these positions are compensated and all are entirely voluntary.

Robert C. Jazwinski serves on Advisory Boards for Alpha Capital Partners, LP and FNB Capital Corporation for which he is not compensated. He and certain clients of JFS have invested in limited partnership units of Alpha Capital Partners, a private equity fund, and loan participations and private equity funds offered by FNB Capital Corporation, a merchant banking company. Neither Robert C. Jazwinski nor JFS receive compensation for introducing clients to these opportunities. However, JFS may charge investment management fees on its clients' investments in and sponsored by these organizations. Robert C. Jazwinski participates on the Advisory Boards because it allows him to monitor the activities of the organizations and the underlying investments. Although this could represent a potential conflict of interest, no client is obligated to invest in any firm with which JFS' officers are associated, and JFS has a duty at all times to act in its clients' best interest.

Robert C. Jazwinski served on the TD Ameritrade Institutional Advisor Panel (Panel) for a one year term from February 2006-2007. He served on the Board of Directors of National Advisors Holdings, Inc. and National Advisors Trust Company from early 2007 to February 2008. He also previously served on the advisory council of Envestnet, Lockwood Advisors, and Charles Schwab Company. These activities are not the principal business of JFS or its principal executive officers.

### **Financial Industry Affiliations**

JFS is part of the Focus Financial Partners, LLC (Focus) network. As such, JFS is a wholly-owned subsidiary of Focus Operating Partners, LLC (Focus Operating), which is a wholly-owned subsidiary of Focus. Focus also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, and other financial services firms (the Focus Partners). The Focus Partners provide wealth management and benefit and investment consulting services, serving individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or limited liability companies as disclosed on their respective Form ADV, Schedule D.

JFS' clients are not solicited to invest in any other Focus Partners' advisory services, and generally Focus Partners do not recommend securities, services, or other investment products of other Focus Partner Firms, unless so disclosed on their respective Form ADV's and with the clients' informed consent, nor are any transactions executed through another Focus Partner's affiliated broker-dealer. Further, Focus Partners do not market their services or share client information amongst each other without prior client consent. Management of other Focus Partners are not involved in the management of JFS. Further, JFS' management does not feel that the relationship with Focus poses a material conflict to clients.

A list of the related person investment advisers and broker-dealers can be found on JFS' Form ADV Part 1, Schedule D, and additional information about Focus can be found at [www.focusfinancialpartners.com](http://www.focusfinancialpartners.com).

JFS is affiliated with JFS Risk Management, LLC, a Pennsylvania licensed insurance agency. JFS Risk Management, LLC may offer for sale, insurance-related products on a commission basis, including to investment advisory clients of JFS. The recommendation by JFS that a client purchase an insurance commission product from JFS' related insurance entity, JFS Risk Management, LLC, presents a conflict of interest. The receipt of commissions by JFS Risk Management, LLC may provide an incentive to recommend insurance products based on commissions to be received rather than on a particular client's need. However, JFS does have a duty at all times to act in the client's best interest.

No client is under any obligation to purchase any insurance commission product from JFS' related insurance entity. Clients are reminded that they may purchase insurance products recommended by JFS through other, non-related insurance agencies. JFS' Chief Compliance Officer, Laura Blaire, remains available to address any questions that clients or prospective clients may have regarding this or any other conflict of interest.

JFS Capital Partners, LLC is a single member Limited Liability Company owned by Jazwinski Financial Services, Inc. JFS Capital Partners, LLC handles business ventures that may be organized as investment opportunities. These types of business ventures, such as the Venango Oil Drilling Partnership, are not a part of the investment advisory activities of JFS Wealth Advisors, LLC. Clients of JFS may be serviced by JFS Capital Partners, LLC, if such services are requested by and/or appropriate to the unique needs of the individual client. No client is obligated to engage the services of JFS Capital Partners, LLC.

JFS Wealth Advisors, LLC and Robert C. Jazwinski each have a minority ownership interest in a savings and loan holding company, National Advisors Holdings, Inc. (NAH) that formed a federally chartered trust company, National Advisors Trust Company (NATC). NAH and NATC are regulated by the Office of Thrift Supervision. The trust company provides a low cost alternative to traditional trust service providers, and JFS refers clients to NATC for trust, custody, and brokerage services.

### **Affiliated Private Funds**

JFS is affiliated with certain private investment funds (together, the "affiliated funds"):

- Venango 2006 Oil Partners I Partnership;
- Private Company Ventures, LLC - loan participations; and
- Weathervane Capital Partners, LLC.

Condensed descriptions of each of the affiliated funds are listed below. The complete description of the terms, conditions, risks, and fees associated with each of the affiliated funds is detailed in each of the affiliated funds' offering documents.

JFS, on a non-discretionary basis, may recommend that qualified clients consider allocating a portion of their investment assets to these types of affiliated funds. The terms and conditions for participation in any affiliated fund, including management fees, conflicts of interest, and risk factors are detailed in each fund's offering documents. JFS' clients are under absolutely no obligation to consider or make an investment in these or any other private investment fund.

Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints, and lack of transparency. These risk factors are detailed in each fund's offering documents, which are provided to each prospective investor for review and consideration. Unlike other liquid investments that a client may maintain,

private investment funds do not provide daily liquidity or pricing. Each prospective client investor would be required to complete a Subscription Agreement. Afterward, the client would have to establish that he or she is qualified for investment in the fund and acknowledges and accepts the various risk factors that are associated with such an investment.

A related person of JFS, JFS Capital Partners, is a general partner in Venango 2006 Oil Partners I Partnership. JFS Capital Partners, LLC is a single member Limited Liability Company owned by Jazwinski Financial Services, Inc. When appropriate to the needs of accredited investors, JFS may suggest investing in this type of partnership. JFS Wealth Advisors does not receive a separate advisory fee for assets invested in Venango 2006 Oil Partners I Partnership. JFS Wealth Advisors does not consider Venango 2006 Oil Partners I Partnership funds part of its discretionary asset base. There are no sales fees or commissions paid with respect to Venango 2006 Oil Partners I Partnership by any investor or partner. JFS Capital Partners, as a general partner, receives separate and typical compensation for acting in this role.

JFS does not anticipate participating in additional gas and oil ventures at this time.

A related person of JFS, Private Company Ventures, LLC is the manager for a series of loan participations. Private Company Ventures, LLC is a Limited Liability Company managed by JFS Capital Partners, LLC. When appropriate to the needs of accredited investors, JFS may suggest investing in this type of loan participation. JFS Wealth Advisors does not receive a separate advisory fee for assets invested in Private Company Ventures, LLC or any of its series. JFS Wealth Advisors does not consider Private Company Ventures, LLC or any of its series funds part of its discretionary asset base. There are no sales fees or commissions paid with respect to Private Company Ventures, LLC, or any of its series, by any investor or partner. JFS Capital Partners, as a manager, receives separate and typical compensation for acting in this role.

A related person of JFS, Thomas D. Paulus is the managing member of Weathervane Capital Partners, LLC. Weathervane Capital Partners, LLC is the general partner in the Weathervane Capital Partners Fund I, II, III, IV, V and VI Limited Partnerships. When appropriate to the needs of accredited investors, JFS may suggest investing in this type of partnership. JFS does not receive a separate advisory fee for assets invested in Weathervane Capital Partners, LLC, any of its Limited Partnerships, or any related private funds. JFS Wealth Advisors does not consider Weathervane Capital Partners, LLC, any of its Limited Partnerships, or any related private funds part of its discretionary asset base. There are no sales fees or commissions paid with respect to Weathervane Capital Partners, LLC, any of its Limited Partnerships, or any related private funds, by any investor or partner. Weathervane Capital Partners, LLC, as a manager, receives separate and typical compensation for acting in this role.

### **Additional Compensation**

JFS receives benefits from the independent custodians JFS uses by participation in the custodians' institutional programs and/or referral programs. (Please see the disclosure under Item 14 below.)

JFS' clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade, Charles Schwab, National Advisors Trust Company, or Fidelity as a result of these types of arrangements. JFS, consistent with its best execution obligation, has negotiated favorable transaction fee arrangements with all of the independent custodians used by JFS for the benefit of all of JFS' clients.

There is no corresponding commitment made by JFS to these custodians or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of any such arrangement.

Laura Blaire, JFS' Chief Compliance Officer, is available to address any questions that a client or prospective client may have regarding these types of arrangements and any perceived conflict of interest these arrangements may create.

As part of its fiduciary duties to clients, JFS strives at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by JFS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence JFS' choice of provider for custody and brokerage services.

### **Item 11 – Code of Ethics, Participation in Client Transactions, & Personal Trading**

JFS has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. JFS' Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and details JFS' practice of monitoring the personal securities transactions of JFS employees. Individuals associated with JFS may buy or sell securities for their personal accounts identical to or different than those recommended to clients. It is the expressed policy of JFS that no person employed by JFS put his or her own interests before that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients. It is also the expressed policy of JFS that the allocation of client transactions is fair and equitable. Limited investment opportunities are offered to clients based on an overall suitability assessment based on factors including, but not limited, the following: level of sophistication, net worth, investable assets, risk tolerance, overall asset allocation, investment strategy, and unique needs and objectives. Once suitable clients are identified in this manner, investment opportunities are made available on a pro rata basis.

Additionally, JFS does not affect any principal or agency cross securities transactions for client accounts. Principal transactions are generally defined as transactions where an adviser, acting as the principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to an advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as the broker-dealer for both the advisory client and for another person on the other side of the transaction. JFS may occasionally recommend and/or use step out trades to manage ETF trading volume if the cost of doing so would be beneficial to the client versus the trading cost of not using step out trades.

To supervise compliance with its Code of Ethics, JFS requires its employees to report covered securities transactions to the firm's Chief Compliance Officer on a quarterly basis. JFS also requires its employees to receive approval from the Chief Compliance Officer prior to investing in any private placements (limited offerings) or IPOs.

JFS requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. JFS' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. Any individual not complying with the above may be subject to disciplinary measures.

JFS will provide a complete copy of its Code of Ethics to any client or prospective client upon request to the Chief Compliance Officer at JFS' principal address.

## **Item 12 – Brokerage Practices**

### **Brokerage Recommendations**

JFS does not have the discretionary authority to determine the broker-dealer to be used or commission rates to be paid. Clients must direct JFS as to the broker-dealer they wish to use.

JFS suggests broker-dealers to clients based on client objectives, the broker-dealer's past record, and the general reputation of the broker-dealer. However, the ultimate choice of broker-dealer is the client's. If a client selects a broker-dealer suggested and used by JFS, JFS will attempt to negotiate commissions and obtain volume discounts and has a duty of best execution. The duty of best execution means that JFS has an obligation to get the best overall value for the client when placing trades and must consider cost, quality, timeliness, etc. However, if a client does not select a broker-dealer suggested and used by JFS, it should be understood that JFS will not have authority to negotiate commissions among various broker-dealers or obtain volume discounts, and best execution may not be achieved. In addition, differences in commission charges may exist between the commissions charged to other clients.

JFS currently suggests and uses the following independent broker-dealers (custodians) for custody and brokerage services when appropriate for the client and consistent with JFS' fiduciary duty to put client interests first: Charles Schwab & Co., Inc., TD Ameritrade, Inc., National Advisors Trust Co., and Fidelity Investments. The specific broker-dealer recommended depends upon the client's unique needs, objectives, and preferences.

JFS participates in the Schwab Institutional (SI) services program offered to independent investment advisers by Charles Schwab & Company, Inc., a FINRA member registered broker-dealer and Member SIPC. JFS recommends Charles Schwab & Company to clients who need brokerage and custodial services. As part of the SI program, JFS may receive benefits that it would not receive if it did not offer investment advice. (Please see the disclosure under Item 14 below.)

JFS participates in the institutional advisor program offered by TD Ameritrade Institutional (TDA). TDA is a division of TD Ameritrade, Inc. (TD Ameritrade), which is a member of FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers services to independently registered investment advisers, which include custody of securities, trade execution, clearance, and settlement of transactions. JFS receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

A condition of participation in a wrap fee program may be that all clients in the program must use a specific broker-dealer for clearing. Clients should refer to the respective brochure and the disclosure document(s) of the investment manager(s) used in the program for information on brokerage practices.

### **Trade Error Policy**

JFS reimburses client accounts for losses resulting from JFS' trade errors but shall not credit accounts for errors resulting in market gains. The gains and losses are reconciled according to the policy of the applicable account custodian. Below are the trade error policies for the primary account custodians JFS uses for client accounts.

Charles Schwab does not use a trade error account; it makes the necessary corrections by buying or selling. When there is a profit from a trade error, Schwab posts a covering trade to the client's account, so the client receives the profit. If the client does not want the profit (ex. for tax purposes), the client may advise Schwab to send the gain to charity. If the profit is \$100 or less, the client may advise Schwab verbally. If the profit is greater than \$100, the client must provide such instructions to Schwab in writing. When there is a loss due to a trade error, JFS is responsible for any losses that are over \$100. Schwab will cover the loss if it is under \$100.

TD Ameritrade automatically moves all net gains from trade corrections to a designated TD Ameritrade Error Account on a daily basis. TD Ameritrade then donates these funds to the American Red Cross or to the 501(c)(3) charity of choice. Net gains are defined as positive error account balances resulting from trade corrections.

Fidelity uses a trade error account. All profits and losses are held in this account and can be used to offset future errors. If the account falls to a debit balance, JFS has to send payment.

At National Advisors Trust Company (NATC), if a trade error results in a profit, the profit can be credited to the client's account or forfeited to a control account at NATC. Losses are moved to a trade error account, and the loss must be covered by JFS.

### **Item 13 – Review of Accounts**

Underlying securities within JFS managed accounts are continually monitored. Accounts are reviewed as to asset allocation, individual holdings, suitability, and performance. Reviews of holdings used for client portfolios are performed by the Investment Committee on at least a quarterly basis and continually, as needed, based on changes in individual positions.

Client information is downloaded each business day, reflecting holdings and prices as of the close of business the previous business day or other most recently priced day. Calculations of asset allocation, individual position weights, total internal-rates-of-return since inception, and annualized internal-rates-of return are then made available, if not actually executed each day. Client portfolio data is maintained in-house in a customized, computer database. Transaction records and market pricing are downloaded from custodians each business day or as often as made available. Specific securities common to client portfolios are monitored on an ongoing basis.

The Investment Committee is led by Chair Robert C. Jazwinski and Co-Chair J. Stephen Lee and includes all Lead Advisors as Investment Committee members. The Committee may invite contributions and also enlist the services of the Chief Compliance Officer.

## REPORTS OF ACCOUNTS

In addition to the no less than quarterly statements and confirmations of transactions that Wealth Management and Investment Advisory Services clients receive from their designated custodian (ex. Charles Schwab, TD Ameritrade, National Advisors Trust Co., and Fidelity), JFS makes periodic reports available to all clients showing their portfolio's financial profile and performance data. Clients are urged to schedule/attend a face-to-face meeting (Progress Review Meeting) to review details, discuss progress in achieving goals, and determine if goals or plans should be adjusted.

Reports may include the client's original amount invested, cost basis for tax purposes, current value, cumulative income, internal and time weighted rates-of-return since inception, and annual rate-of-return for each holding. Weightings by category and portfolio totals may be summarized as well.

### Item 14 – Client Referrals and Other Compensation

#### Client Referrals/Solicitor Arrangements

There may be occasions when JFS may pay a percentage of the fee received from accounts that have been referred to us to the person making the referral (a solicitor). In such cases the client will receive a separate written disclosure statement from the solicitor before opening an account with JFS. The disclosure statement will explain, among other things, the nature of JFS' affiliation with the solicitor, if any, and a description of the compensation the solicitor will receive from JFS.

JFS has a solicitation agreement with an accounting firm, Schroedel, Scullin, and Bestic (SSB). SSB is independent of JFS. When SSB advisors believe that their clients may benefit from JFS' investment management or financial services, the clients are introduced to JFS. If the referred client becomes a client of JFS, SSB shares in a portion of any management fees that may be earned. SSB's share of the fees is approximately 30%. However, the percentage fee may vary depending on the services being provided by JFS and SSB. JFS does not charge clients referred by SSB any fees or costs higher than its standard schedule offered to its client. JFS does not pass solicitor fees on to its clients. Specifics are disclosed to each client beforehand. Clients introduced in this manner receive the same services and priorities as all other JFS clients.

JFS may receive client referrals from TD Ameritrade, Inc. (TD Ameritrade) through its participation in TD Ameritrade AdvisorDirect (the referral program). In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, JFS may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with JFS. There is no employee or agency relationship between them. TD Ameritrade has established the referral program as a way of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisers. TD Ameritrade does not supervise JFS and has no responsibility for JFS' management of client portfolios or JFS' other advice or services. JFS pays fees, not to exceed 25% of the advisory fee that the referred client pays to JFS, to TD Ameritrade in connection with successful referrals made through AdvisorDirect. JFS will also pay TD Ameritrade the solicitation fee on any advisory fees received by JFS from any of a referred client's family members, including a spouse, child, or any other immediate family member who

resides with the referred client and hired JFS on the recommendation of the referred client. JFS does not charge clients referred through AdvisorDirect any fees or costs higher than its standard schedule offered to its clients. JFS does not pass solicitor fees on to its clients. Specifics are disclosed to each client beforehand. Clients introduced in this manner receive the same services and priorities as all other JFS clients.

JFS' participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisers that encourage their clients to custody their assets and trade client accounts at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. To obtain client referrals from TD Ameritrade, JFS may have an incentive to recommend that clients custody assets and place transactions for accounts that JFS manages with TD Ameritrade. Also, JFS has agreed not to solicit clients referred through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when it is in the client's best interest to do so. JFS' participation in the AdvisorDirect program does not change JFS' duty to seek best execution of trades for client accounts.

JFS may receive client referrals from Charles Schwab through its participation in the Schwab Advisor Network (SAN). SAN is designed to help investors find an independent investment adviser. Charles Schwab is a broker-dealer independent of and unaffiliated with JFS. Charles Schwab does not supervise JFS and has no responsibility for the management of client portfolios. JFS pays Charles Schwab a fee for each client referral through SAN. JFS' participation in SAN may raise potential conflicts of interest as described below.

JFS pays Charles Schwab a "Participation Fee" on all referred clients' accounts that are maintained in custody at Charles Schwab and a "Non-Charles Schwab Custody Fee" on all accounts that are maintained at, or transferred to, another custodian.

The Participation Fee paid by JFS is a percentage of the value of the assets in the client's account. JFS pays Charles Schwab the Participation Fee as long as the referred client's account remains in custody at Charles Schwab. The Participation Fee is billed to JFS quarterly and may be increased, decreased or waived by Charles Schwab from time to time. The Participation Fee is paid by JFS and not by the client. JFS has agreed not to charge clients referred through SAN fees or costs greater than the fees or costs JFS charges clients with similar portfolios who were not referred through SAN.

JFS generally pays Charles Schwab a Non-Charles Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from, Charles Schwab. This fee does not apply if the client was solely responsible for the decision not to maintain custody at Charles Schwab. The Non-Charles Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Charles Schwab. The Non-Charles Schwab Custody Fee is higher than the Participation Fees JFS generally would pay in a single year. Thus, JFS has an incentive to recommend that client accounts be held in custody at Charles Schwab.

The Participation and Non-Charles Schwab Custody Fees are based on assets in accounts of JFS' clients who were referred by Charles Schwab and those referred clients' family members living in the same household. Thus, JFS has incentives to encourage household members of clients referred through SAN to maintain custody of their accounts and execute transactions at Charles Schwab and to instruct Charles Schwab to debit JFS' fees directly from the accounts.



For accounts of JFS' clients maintained in custody at Charles Schwab, Charles Schwab will not charge the client separately for custody but will receive compensation from JFS' clients in the form of commissions or other transaction-related compensation on securities trades executed through Charles Schwab. Charles Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Charles Schwab.

Charles Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, JFS may have an incentive to cause trades to be executed through Charles Schwab rather than another broker-dealer. JFS nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Charles Schwab may be executed through a different broker-dealer than trades for JFS' other clients. Thus, trades for accounts custodied at Charles Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

At the time of their introduction to the firm, all potential clients referred by a solicitor are provided with a copy of JFS' Form ADV Part 2. They are also given a specific disclosure form, which they are asked to read, discuss with JFS, and sign to ensure that the nature of our potential association is fully understood.

### **Additional Compensation**

JFS recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (SI), a registered broker-dealer, Member SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts. Schwab Institutional provides JFS with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers at no charge to them so long as a total of at least \$10 million of the adviser's clients' account assets are maintained at Schwab Institutional.

SI's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. SI also makes available to JFS other products and services that benefit JFS but may not benefit its clients' accounts directly. Some of these other products and services assist JFS in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of JFS' fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of JFS' accounts, including accounts not maintained at SI.

SI may also provide JFS with other services intended to help JFS to manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, SI may make available, arrange and/or pay for these types of services to JFS by independent third parties. SI may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to JFS.

While as a fiduciary JFS strives to act in its clients' best interests, JFS' recommendation that clients maintain their assets in accounts at SI may be based in part on the benefit to JFS of the availability of some of the products and services listed above.

JFS also recommends that clients establish brokerage accounts with TD Ameritrade Institutional (TDA), a registered broker-dealer, Member SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts. TDA is a division of TD Ameritrade, Inc. (TD Ameritrade), Member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. There is no direct link between JFS' participation in the program and the investment advice it gives to its clients, although JFS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

TDA's products and services (provided without cost or at a discount) include receipt of duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving adviser 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, and access to mutual funds with no transaction fees and to certain institutional money managers. Services also include discounts on compliance, marketing, research, technology, and practice management products or services provided to JFS by third party vendors.

TDA may also have paid for business consulting and professional services received by JFS' related persons. Some of the products and services made available by TDA through the program may benefit JFS but may not directly benefit its client accounts. These products or services may assist JFS in managing and administering client accounts, including accounts not maintained at TDA. Other services made available by TDA are intended to help JFS manage and further develop its business enterprise. The benefits received by JFS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TDA.

As noted in Item 12, JFS considers a number of factors in recommending custodians and brokers for client accounts. Such factors include, but are not limited to, execution capability, experience and financial stability, reputation, and the quality of services provided.

JFS may receive free or discounted support services and products from other independent custodians JFS uses, such as National Advisors Trust Company and Fidelity Investments. These products and services help JFS better monitor and service client accounts maintained at that particular custodian. These services and products may include investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance related publications, and practice management related publications. They may also include free or discounted consulting services, conference registration fees, meetings, other educational and/or social events, and computer software and/or other products used by JFS for its investment advisory business operations. Some of the support services and products assist JFS in managing and administering client accounts. Others do not directly provide such assistance, but assist JFS in managing and further developing its business enterprise. This may include discounted and shared expenses for existing and prospective client events.

JFS' clients do not pay more for investment transactions effected and/or assets maintained at TD Ameritrade, Charles Schwab, National Advisors Trust Company, or Fidelity as a result of these types

of arrangements. JFS, consistent with its best execution obligation, has negotiated favorable transaction fee arrangements with all of the independent custodians used by JFS for the benefit of all of JFS' clients.

There is no corresponding commitment made by JFS to these custodians or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of any such arrangement.

Laura Blaire, JFS' Chief Compliance Officer, is available to address any questions that a client or prospective client may have regarding these types of arrangements and any perceived conflict of interest these arrangements may create.

As part of its fiduciary duties to clients, JFS strives at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by JFS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence JFS' choice of provider for custody and brokerage services.

### **Item 15 – Custody**

All investment accounts are held at a qualified custodian (ex. Charles Schwab, TD Ameritrade, National Advisors Trust Co., and Fidelity). The custodian provides the client with no less than quarterly statements for each account. JFS urges clients to carefully review these statements and compare such official custodial records to the account statements that JFS may provide the client. JFS' statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

JFS has custody of some client funds and securities because JFS deducts advisory fees from client accounts when directed and authorized by the client to do so. JFS also has custody for client accounts for which Robert C. Jazwinski serves as trustee as requested and authorized by the client and due to a related person serving as managing member of limited partnerships in which JFS' clients invest.

Effective March 12, 2010, JFS is subject to a surprise annual audit by a qualified, PCAOB Certified Public Accounting (CPA) firm, including related filings, for those client accounts where JFS is deemed to have custody. These include, but may not be limited to, the account types listed above.

### **Item 16 – Investment Discretion**

JFS usually receives authority from the client at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold without prior consent (discretionary authority). In all cases, however, this discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, JFS observes the investment policies, limitations and restrictions of the clients for which it advises. Asset allocations and preferences are typically detailed in an investment recommendation letter, asset allocation form, or investment

policy statement. JFS' discretionary authority is detailed in the client's advisory agreement or a separate Limited Power of Attorney form. Investment restrictions are typically listed in the advisory agreement.

Changes to investment guidelines and restrictions must typically be provided to JFS in writing.

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

JFS does not vote proxies for its clients as a matter of firm policy and practice. Clients expressly retain the authority for and responsibility to vote proxies for any and all securities maintained in client accounts. JFS may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about their financial condition. JFS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

**JFS' Chief Compliance Officer, Laura Blaire, remains available to address any questions regarding this Part 2A.**



## PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

Toll Free: 877-745-1700

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This Brochure Supplement provides information about Sarah J. Amey that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about Sarah J. Amey is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Sarah J. Amey**

**Birth Year:** 1982

**Education:** Shippensburg University, Shippensburg, PA – B.A.

### **Professional Credentials:**

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

The mission of the Certified Financial Planner Board of Standards, Inc. (CFP Board) is to benefit the public by granting the CFP® certification and upholding it as the recognized standard of excellence for personal financial planning.

CFP® practitioners have met rigorous examination, experience, and ethics requirements.

CFP Board's CFP® certification process consists of initial requirements in the areas of Education, Examination, Experience and Ethics (known as "the four Es").

Prerequisites for certification include a bachelor's degree (or higher), or its equivalent, in any discipline, from an accredited college or university and completion of a CFP Board-registered education program.

To receive the CFP® certification, a candidate must:

- Pass the CFP® certification examination;
- Meet the experience requirement of at least three years of qualifying full-time work experience;
- Pass the *Fitness Standards for Candidates and Registrants* and background check;
- Pay a one-time initial certification application fee of \$100 for the background check;
- Pay a certification fee of \$360 every two years; and
- Receive authorization to use the Marks.

CFP® practitioners must meet the following three renewal requirements every two years:

- Complete a certification application;
- Pay a \$360 certification fee; and
- Complete 30 hours of continuing education of which two hours must be from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.

#### **Certified Investment Management Analyst™ (CIMA®)**

The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete

a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA®).

**Business:** JFS Wealth Advisors, LLC  
Lead Advisor – 2013 - Present

JFS Wealth Advisors, LLC  
Advisor – 2011 - 2013

BNY Mellon Wealth Management  
Portfolio Administrator – 2007 - 2011

PSECU  
Project Manager – 2006 – 2007

Morgan Stanley  
Financial Advisor Trainee – 2005

Harrisburg Regional Chamber of Commerce  
Membership Relations Manager – 2004 – 2005

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Sarah J. Amey.

### **Item 4- Other Business Activities**

Sarah J. Amey is a licensed insurance agent. Sarah serves in this capacity for a related person, JFS Risk Management, LLC. Sarah does not receive commissions related to her role with JFS Risk Management, LLC. However, there may be an indirect benefit to JFS Wealth Advisors, LLC for such business activities.

### **Item 5- Additional Compensation**

Sarah J. Amey does not receive any additional compensation from any other person or entity. She may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. She may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

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## **Item 6 - Supervision**

Investment decisions for clients are made by each client's Lead Advisor. However, JFS' Lead Advisors share common firm investment strategies. JFS investment strategy decisions are made by members of the Investment Committee. JFS' Investment Committee is led by Chair Robert C. Jazwinski and Co-Chair J. Stephen Lee. The Investment Committee also includes the Director of Investment and Portfolio Strategies and all Lead Advisors. The Investment Committee meets regularly and reviews and updates JFS' investment strategies no less than quarterly. Investments are evaluated independently as well as in the context of clients' existing holdings and sector exposures.





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610-321-2400  
Fax: 724-383-1254

This Brochure Supplement provides information about Karen L. Chikosky that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about Karen L. Chikosky is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Karen L. Chikosky**

**Birth Year:** 1949

**Education:** University of Colorado, Colorado Springs, CO – B.A.

### Professional Credentials:

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

The mission of the Certified Financial Planner Board of Standards, Inc. (CFP Board) is to benefit the public by granting the CFP® certification and upholding it as the recognized standard of excellence for personal financial planning.

CFP® practitioners have met rigorous examination, experience, and ethics requirements.

CFP Board's CFP® certification process consists of initial requirements in the areas of Education, Examination, Experience and Ethics (known as "the four Es").

Prerequisites for certification include a bachelor's degree (or higher), or its equivalent, in any discipline, from an accredited college or university and completion of a CFP Board-registered education program.

To receive the CFP® certification, a candidate must:

- Pass the CFP® certification examination;
- Meet the experience requirement of at least three years of qualifying full-time work experience;
- Pass the *Fitness Standards for Candidates and Registrants* and background check;
- Pay a one-time initial certification application fee of \$100 for the background check;
- Pay a certification fee of \$360 every two years; and
- Receive authorization to use the Marks.

CFP® practitioners must meet the following three renewal requirements every two years:

- Complete a certification application;
- Pay a \$360 certification fee; and
- Complete 30 hours of continuing education of which two hours must be from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.

**Business:** JFS Wealth Advisors, LLC  
Principal, Lead Advisor – 2002 - Present

JFS Wealth Advisors, LLC  
Lead Advisor – 2000 - 2002

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Karen L. Chikosky.

### **Item 4- Other Business Activities**

Karen L. Chikosky does not have any other business activities.

### **Item 5- Additional Compensation**

Karen L. Chikosky does not receive any additional compensation from any other person or entity. She may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. She may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

### **Item 6 - Supervision**

Investment decisions for clients are made by each client's Lead Advisor. However, JFS' Lead Advisors share common firm investment strategies. JFS investment strategy decisions are made by members of the Investment Committee. JFS' Investment Committee is led by Chair Robert C. Jazwinski and Co-Chair J. Stephen Lee. The Investment Committee also includes the Director of Investment and Portfolio Strategies and all Lead Advisors. The Investment Committee meets regularly and reviews and updates JFS' investment strategies no less than quarterly. Investments are evaluated independently as well as in the context of clients' existing holdings and sector exposures.



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This Brochure Supplement provides information about Gary A. Dalessandro that supplements the Brochure of JFS Wealth Advisors, LLC (“JFS”). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Gary A. Dalessandro is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2- Educational Background and Business Experience**

**Gary A. Dalessandro**

**Birth Year:** 1959

**Education:** Clarion University, Clarion, PA – B.A.

### **Professional Credentials:**

#### **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 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.

#### **Personal Financial Specialist (PFS)**

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice.

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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Prerequisites for certification include a bachelor's degree (or higher), or its equivalent, in any discipline, from an accredited college or university and completion of a CFP Board-registered education program.

To receive the CFP® certification, a candidate must:

- Pass the CFP® certification examination;
- Meet the experience requirement of at least three years of qualifying full-time work experience;
- Pass the *Fitness Standards for Candidates and Registrants* and background check;
- Pay a one-time initial certification application fee of \$100 for the background check;
- Pay a certification fee of \$360 every two years; and
- Receive authorization to use the Marks.

CFP® practitioners must meet the following three renewal requirements every two years:

- Complete a certification application;
- Pay a \$360 certification fee; and
- Complete 30 hours of continuing education of which two hours must be from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.

**Business:** JFS Wealth Advisors, LLC  
Principal, Tax & Estate Planning Specialist – 2010 - Present

JFS Wealth Advisors, LLC  
Principal, Senior Accountant, Lead Advisor – 2002 - 2010

JFS Wealth Advisors, LLC  
Senior Accountant, Lead Advisor – 1998 - 2002

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Gary A. Dalessandro.

### **Item 4- Other Business Activities**

Gary A. Dalessandro does not have any other business activities.

### **Item 5- Additional Compensation**

Gary A. Dalessandro does not receive any additional compensation from any other person or entity. He may receive a bonus from JFS that is based on the number or amount of new accounts, sales or

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client referrals. He may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

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This Brochure Supplement provides information about Aaron K. Dayton that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron K. Dayton is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2- Educational Background and Business Experience

**Aaron K. Dayton**

**Birth Year:** 1974

**Education:** Slippery Rock University, Slippery Rock, PA – B.S.

### Professional Credentials:

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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- Complete a certification application;
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**Business:** JFS Wealth Advisors, LLC  
Lead Advisor – 2012 - Present

Bank of New York Mellon Wealth Management  
Senior Portfolio Officer – 2004 – 2012

Mellon Private Wealth Management  
Assistant Portfolio Officer – 2002 - 2004

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this “Business” section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Aaron K. Dayton.

### **Item 4- Other Business Activities**

Aaron K. Dayton does not have any other business activities.

### **Item 5- Additional Compensation**

Aaron K. Dayton does not receive any additional compensation from any other person or entity. He may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. He may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

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Additional information about Robert C. Jazwinski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2- Educational Background and Business Experience**

**Robert C. Jazwinski**

**Birth Year:** 1955

**Education:** Youngstown State University, Youngstown, OH – M.B.A.  
Westminster College, New Wilmington, PA – B.A.

### **Professional Credentials:**

#### **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 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.

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- Complete 30 hours of continuing education of which two hours must be from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.

**Business:** JFS Wealth Advisors, LLC  
President, Managing Principal – 1986 - Present

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Robert C. Jazwinski.

### **Item 4- Other Business Activities**

Robert C. Jazwinski does not have any other business activities.

### **Item 5- Additional Compensation**

Robert C. Jazwinski does not receive commissions nor does he receive a bonus that is based on the number or amount of new accounts, sales or client referrals.

Robert C. Jazwinski may directly or indirectly receive earn-out or other compensation from Focus Financial Partners, LLC, the parent company of JFS Wealth Advisors, LLC.

## **Item 6 - Supervision**

Investment decisions for clients are made by each client's Lead Advisor. However, JFS' Lead Advisors share common firm investment strategies. JFS investment strategy decisions are made by members of the Investment Committee. JFS' Investment Committee is led by Chair Robert C. Jazwinski and Co-Chair J. Stephen Lee. The Investment Committee also includes the Director of Investment and Portfolio Strategies and all Lead Advisors. The Investment Committee meets regularly and reviews and updates JFS' investment strategies no less than quarterly. Investments are evaluated independently as well as in the context of clients' existing holdings and sector exposures.



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This Brochure Supplement provides information about J. Stephen Lee that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about J. Stephen Lee is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

### J. Stephen Lee

**Birth Year:** 1959

**Education:** University of Pittsburgh, Pittsburgh, PA – M.B.A.  
Brown University, Providence, RI - B.A.

**Business:** JFS Wealth Advisors, LLC  
Managing Principal, Lead Advisor – 2013 - Present

H.L. Zeve Associates, Inc.  
President, Principal, Chief Compliance Officer – 1994 - 2013

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

## Item 3- Disciplinary Information

There are no legal or disciplinary events for J. Stephen Lee.

## Item 4- Other Business Activities

J. Stephen Lee does not have any other business activities.

## Item 5- Additional Compensation

J. Stephen Lee does not receive commissions nor does he receive a bonus that is based on the number or amount of new accounts, sales or client referrals.

J. Stephen Lee may directly or indirectly receive earn-out or other compensation from Focus Financial Partners, LLC, the parent company of JFS Wealth Advisors, LLC.

## Item 6 - Supervision

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This Brochure Supplement provides information about Amanda L. Marcello that supplements the Brochure of JFS Wealth Advisors, LLC (“JFS”). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Amanda L. Marcello is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Amanda L. Marcello**

**Birth Year:** 1980

**Education:** Youngstown State University, Youngstown, OH – B.A.

### **Professional Credentials:**

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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To receive the CFP® certification, a candidate must:

- Pass the CFP® certification examination;
- Meet the experience requirement of at least three years of qualifying full-time work experience;
- Pass the *Fitness Standards for Candidates and Registrants* and background check;
- Pay a one-time initial certification application fee of \$100 for the background check;
- Pay a certification fee of \$360 every two years; and
- Receive authorization to use the Marks.

CFP® practitioners must meet the following three renewal requirements every two years:

- Complete a certification application;
- Pay a \$360 certification fee; and
- Complete 30 hours of continuing education of which two hours must be from a CFP Board-approved program on CFP Board's *Code of Ethics and Professional Responsibility (Code of Ethics)* and/or *Financial Planning Practice Standards (Practice Standards)*.

**Business:** JFS Wealth Advisors, LLC  
Lead Advisor – 2010 - Present

JFS Wealth Advisors, LLC  
Support Advisor – 2007 - 2010

JFS Wealth Advisors, LLC  
Advisor Support – 2002 - 2007

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this “Business” section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Amanda L. Marcello.

### **Item 4- Other Business Activities**

Amanda L. Marcello is a licensed insurance agent. Amanda serves in this capacity for a related person, JFS Risk Management, LLC. Amanda does not receive commissions related to her role with JFS Risk Management, LLC. However, there may be an indirect benefit to JFS Wealth Advisors, LLC for such business activities.

### **Item 5- Additional Compensation**

Amanda L. Marcello does not receive any additional compensation from any other person or entity. She may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. She may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

### **Item 6 - Supervision**

Investment decisions for clients are made by each client’s Lead Advisor. However, JFS’ Lead Advisors share common firm investment strategies. JFS investment strategy decisions are made by members of the Investment Committee. JFS’ Investment Committee is led by Chair Robert C. Jazwinski and Co-Chair J. Stephen Lee. The Investment Committee also includes the Director of Investment and Portfolio Strategies and all Lead Advisors. The Investment Committee meets regularly and reviews and updates JFS’ investment strategies no less than quarterly. Investments are evaluated independently as well as in the context of clients’ existing holdings and sector exposures.



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1055 Westlakes Drive, 3<sup>rd</sup> Floor  
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610-321-2400  
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This Brochure Supplement provides information about Thomas D. Paulus that supplements the Brochure of JFS Wealth Advisors, LLC (“JFS”). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas D. Paulus is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Thomas D. Paulus**

**Birth Year:** 1966

**Education:** Temple University, Philadelphia, PA – B.A.

**Business:** JFS Wealth Advisors, LLC  
Managing Principal, Lead Advisor – 2015 - Present

Weathervane Wealth Management, LLC  
President – 2004 - 2015

Patriot Advisors, LLC  
President – 2002 – 2004

Bonds & Paulus Associates, Inc.  
President – 1993 - 2002

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this “Business” section.*

## Item 3- Disciplinary Information

There are no legal or disciplinary events for Thomas D. Paulus.

## Item 4- Other Business Activities

Thomas D. Paulus does not have any other business activities.

## Item 5- Additional Compensation

Thomas D. Paulus does not receive commissions nor does he receive a bonus that is based on the number or amount of new accounts, sales or client referrals.

Thomas D. Paulus may directly or indirectly receive earn-out or other compensation from Focus Financial Partners, LLC, the parent company of JFS Wealth Advisors, LLC.

## Item 6 - Supervision

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This Brochure Supplement provides information about Deborah A. Stiger that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about Deborah A. Stiger is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2- Educational Background and Business Experience**

**Deborah A. Stiger**

**Birth Year:** 1960

**Education:** The Pennsylvania State University, State College, PA – B.S.

### **Professional Credentials:**

#### **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 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.

#### **Personal Financial Specialist (PFS)**

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice.

#### **Chartered Retirement Plans Specialist<sup>SM</sup> (CRPS<sup>®</sup>)**

The CRPS<sup>®</sup> Program is specifically targeted at professionals who design, install and maintain retirement plans for the business community.

The College for Financial Planning<sup>®</sup> awards the CHARTERED RETIREMENT PLANS SPECIALIST<sup>SM</sup> and CRPS<sup>®</sup> designation to students who:

- Successfully complete the program;
- Pass the final examination; and



- Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Conferment of the designation is contingent upon the College for Financial Planning®'s review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics form within six month of passing the final exam. Failure to complete and submit the form within this timeframe may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPS® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPS® designation by:

- Completing 16 hours of continuing education;
- Reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- Paying a biennial renewal fee of \$75.

### **Accredited Investment Fiduciary™ (AIF®)**

AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards. The Center for Fiduciary Studies focuses on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.

Those who earn the AIF® mark have successfully completed a specialized program on investment fiduciary standards of care and passed a comprehensive examination. AIF® training enables investment fiduciaries to absorb the Prudent Practices, their legal underpinnings and how to apply them within existing fiduciary policies and procedures.

Prerequisites for the AIF® designation include a minimum of eight years of relevant experience or an equivalent combination of education, experience, and professional development/credential(s).

AIF® designees must:

- Accrue six hours of continuing professional education with at least four coming from fi360-produced sources;
- Attest to a code of ethics;
- Maintain current contact information in fi360's designee database; and
- Remit annual dues.

**Business:** JFS Wealth Advisors, LLC  
Principal, Business Retirement Plan Specialist – 2010 - Present

JFS Wealth Advisors, LLC  
Principal, Lead Advisor, Accountant – 2002 – 2010

JFS Wealth Advisors, LLC  
Senior Accountant, Lead Advisor – 1996 - 2002

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this “Business” section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Deborah A. Stiger.

### **Item 4- Other Business Activities**

Deborah A. Stiger does not have any other business activities.

### **Item 5- Additional Compensation**

Deborah A. Stiger does not receive any additional compensation from any other person or entity. She may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. She may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

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This Brochure Supplement provides information about Joseph J. Virostek, Jr. that supplements the Brochure of JFS Wealth Advisors, LLC (“JFS”). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph J. Virostek, Jr. is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Joseph J. Virostek, Jr.**

**Birth Year:** 1952

**Education:** University of Pittsburgh, Pittsburgh, PA – M.S.  
John Carroll University, Cleveland, OH – B.S.

### Professional Credentials:

#### Chartered Financial Analyst (CFA)

The Chartered Financial Analyst® (CFA) credential is the globally recognized mark of distinction and benchmark for measuring the expertise, experience, and ethics of serious investment professionals. Earning the credential demonstrates mastery of a broad range of practical portfolio management and advanced investment analysis skills.

The CFA Program curriculum covers concepts and skills connecting academic theory with current practice and ethical and professional standards to provide a strong foundation of advanced investment analysis and real-world portfolio management. To earn the charter, a CFA candidate must:

- Meet one of the following criteria to enroll in the CFA Program;
  - Have a bachelor's degree or equivalent
  - Be in the final year of a bachelor's degree program
  - Have four years of professional work experience
  - Have a combination of professional work and university experience that totals at least four years
- Meet the professional conduct admission criteria for the CFA Program;
- Pass the Level I, II, and III Exams;
- Have four years of professional work experience in the investment decision-making process (accrued before, during, or after participation in the CFA Program; and
- Join CFA Institute as a regular member.

The CFA credential is administered through the CFA Institute, which upholds the Code of Ethics and Standards of Professional Conduct, exam rules and regulations, and Bylaws to protect the integrity of its membership, designations, and examination programs. The Professional Conduct Program administers the disciplinary process for the CFA Institute. Every member of the CFA Institute must complete a Professional Conduct Statement annually to disclose any potential violations of the Code and Standards. Candidates make similar disclosures as part of the registration and enrollment process.

#### Accredited Investment Fiduciary Analyst™ (AIFA®)

AIFA® designees' primary function is to perform, or assist in, assessments of an investment steward's, advisor's or manager's conformance to a Global Fiduciary Standard of Excellence using fi360's ISO-like procedure of assessment. AIFA designees possess the ability and knowledge to advise clients on deficiencies in investment processes.

Prerequisites for the AIFA® designation include holding the Accredited Investment Fiduciary® (AIF®) designation and a minimum of eight years of relevant experience in a non-clerical role in the financial services (or a related) industry.

AIFA® designees must:

- Accrue ten hours of continuing professional education with at least six coming from fi360-produced sources;
- Attest to a code of ethics;
- Maintain current contact information in fi360's designee database; and
- Remit annual dues.

**Business:** JFS Wealth Advisors, LLC  
Director of Investments & Portfolio Strategies – 2015 - Present

BPU Investment Management, Inc.  
Managing Director, Investments – 2007 – 2015

First Commonwealth Financial Advisors  
Financial Planner, Chief Compliance Officer, Vice President – 2004 – 2007

Bank of New York Mellon  
VP and Risk Analyst – 2002 – 2004  
VP and Risk Review Manager – 1996 – 2002  
VP and Group Leader – 1995 – 1996  
Assistant VP and Trading Manager – 1989 - 1995

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Joseph J. Virostek, Jr..

### **Item 4- Other Business Activities**

Joseph J. Virostek, Jr. does not have any other business activities.

### **Item 5- Additional Compensation**

Joseph J. Virostek, Jr. does not receive any additional compensation from any other person or entity. He may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. He may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

### **Item 6 - Supervision**

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Additional information about Thomas D. Wilson is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

**Thomas D. Wilson**

**Birth Year:** 1978

**Education:** The Pennsylvania State University, State College, PA – B.A.

### Professional Credentials:

#### **CERTIFIED FINANCIAL PLANNER™ (CFP®)**

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**Business:** JFS Wealth Advisors, LLC  
Lead Advisor – 2014 - Present

WrapManager, Inc.  
Vice President – 2009 - 2014



Fisher Investment, LLC  
Investment Counselor – 2005 - 2009

MBT Partners, Janney Montgomery Scott, LLC  
Financial Consultant, Founding Partner – 2001 - 2005

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this "Business" section.*

### **Item 3- Disciplinary Information**

There are no legal or disciplinary events for Thomas D. Wilson.

### **Item 4- Other Business Activities**

Thomas D. Wilson does not have any other business activities.

### **Item 5- Additional Compensation**

Thomas D. Wilson does not receive any additional compensation from any other person or entity. He may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. He may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

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This Brochure Supplement provides information about Ronald W. Yost that supplements the Brochure of JFS Wealth Advisors, LLC ("JFS"). You should have received a copy of that Brochure. Please contact Laura Blaire, Chief Compliance Officer, by phone at 724-962-3200 or 1-877-745-1700 or by email at [lblaire@jfswa.com](mailto:lblaire@jfswa.com) if you did not receive JFS' Brochure or if you have any questions about the contents of this supplement.

Additional information about Ronald W. Yost is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2- Educational Background and Business Experience

### Ronald W. Yost

**Birth Year:** 1968

**Education:** The Pennsylvania State University, State College, PA – B.A.

**Business:** JFS Wealth Advisors, LLC  
Lead Advisor – 2013 - Present

H.L. Zeve Associates, Inc.  
Vice President – 2004 - 2013

Charles Schwab & Company  
Vice President, Manager – 2001 - 2004

*Note: JFS Wealth Advisors, LLC refers also to any predecessor firms applicable during the employment period(s) listed in this “Business” section.*

## Item 3- Disciplinary Information

There are no legal or disciplinary events for Ronald W. Yost.

## Item 4- Other Business Activities

Ronald W. Yost does not have any other business activities.

## Item 5- Additional Compensation

Ronald W. Yost does not receive any additional compensation from any other person or entity. He may receive a bonus from JFS that is based on the number or amount of new accounts, sales or client referrals. He may also receive a bonus from JFS based on the sales or commissions of JFS Risk Management, LLC, a related person of JFS.

## Item 6 - Supervision

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