

**SEC FORM ADV Part 2A
“Brochure”**

Apollo Wealth Management, LLC

CRD # 144673

26 Fox Trace
Lancaster, NY 14086
Telephone: (716) 783-1610
www.apollowm.com

April 29, 2020

This brochure (the “Brochure”) provides information about the qualifications and business practices of Apollo Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us by telephone at (716)783-1610.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Please note, while this Brochure may use the terms “registered investment adviser” and/or “registered,” registration itself does not imply a certain level of skill or training.

Additional information about the firm and its representatives is also available on the SEC’s website at www.adviserinfo.sec.gov

Item 2: Material Changes

We update this document annually, or more frequently in the event of certain material changes. This section discusses only material changes to Apollo's Form ADV Part 2A Brochure since the date of our last update, which was an *Other-than-Annual* update on February 27, 2020. As well, minor changes have been made to this Brochure such that we encourage you to read the Brochure in its entirety.

At that time, the Firm made material changes to the following sections:

- We have amended the disclosure in Item 4 - Advisory Business to clearly explain that the Adviser currently only provides advice with regards to limited types of investments, i.e., mutual funds and ETFs.
- We have amended the disclosure in Item 5 - Fees and Compensation to accurately reflect the Adviser's current fee tiers.
- We have expanded the disclosure in Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss
- We have amended the disclosure in Item 12 - Brokerage Practices to clarify that the Adviser has discretion to select the broker-dealer for client transactions pursuant to the provisions included in its advisory contracts
- We have expanded the disclosure in Item 13 - Review of Accounts to specifically describe the frequency and nature of any reviews of client accounts performed on an ongoing basis by the Adviser
- We have amended the disclosure in Item 16 - Investment Discretion to describe the "reasonable limitations" a client may place on the discretion the Adviser exercises.
- We have amended the disclosure in Item 17 - Voting Client Securities.

Additional information about Apollo Wealth Management, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Apollo Wealth Management, LLC who required to be notice filed as investment adviser representatives of Apollo Wealth Management, LLC.

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Item 4: Advisory Business

Established in 2007 as a sole proprietorship by William Ochocinski, Apollo Wealth Management, LLC (the “Firm” or “Apollo”) was formed in April 2014 and offers fee-based investment advice, including portfolio management, financial planning, and pension consulting services.

Portfolio Management Services

The Firm’s customized portfolio management services are provided on a discretionary and non-discretionary basis, tailored to the individual needs of the Firm’s clients according to each Client’s investment objectives, goals and financial situation. Apollo will honor any reasonable investment restrictions on investing in certain securities or types of securities as requested by the client in writing. Apollo works with Clients to understand each Client’s risk tolerance, investment objectives, investment attribute preferences, and to determine an appropriate asset portfolio allocation and portfolio construction. Depending on how a Client’s assets are allocated, they are managed in different ways. The Firm currently only provides advice with regards to limited types of investments, i.e., mutual funds and ETFs. All Clients have the ability to request reasonable restrictions on how their Advisory Account is allocated, but Apollo may not be able to accommodate all restrictions based on specific mandates of particular strategies. If Apollo cannot accommodate a requested restriction, the Client will be notified and given the option to withdraw their request, or the Client can work Apollo to find an investment solution that meets the Client’s expectations. If Apollo is unable to accommodate a Client’s requested restrictions, the Client will need to find another firm to help meet their financial objectives.

Financial Planning Services

Apollo’s financial planning services include preparing recommendations according to the client’s investment objectives, goals and financial situation. The Firm’s financial planning services may also incorporate certain investment strategies tailored to work in tandem with the Firm’s portfolio management services. Clients are under no obligation to engage Apollo to implement the recommendations made within the financial plan.

Pension Consulting Services

The Firm’s pension consulting services incorporate the Firm’s financial planning and portfolio management strategies described above to provide pension clients with a variety of investment options.

Assets Under Management: As of December 31, 2019, Apollo managed \$65,023,000 on a non-discretionary basis and \$1,140,000 on a discretionary basis.

Item 5: Fees and Compensation

Pursuant to an investment advisory contract signed by each client, clients pay Apollo a quarterly management fee. The fee is payable in advance or in arrears depending on the terms negotiated with the client and is based on the amount of the assets to be managed as of the first business day of each quarter. The table below defines the asset-based fees generally charged by the Firm for its investment management services:

Total Assets Under Management	Fee*
\$0 - \$249,000	1.20%
\$250,000 - \$499,999	1.00%
\$500,000 - \$999,999	0.90%
\$1,000,000 - \$1,999,999	0.85%
\$2,000,000 - \$4,999,999	0.70%
\$5,000,000 plus	0.53%

**These fees may be negotiated by Apollo at its sole discretion.*

In addition to the advisory fee charged by the Firm, clients may incur addition charges for brokerage, custodial, and other services, which may be charged directly to the client's account. Clients may purchase investment products recommended by the Firm through brokers or agents that are not affiliated with the Firm. Clients whose assets are invested in mutual funds may also pay fees associated with such investments, which may include investment advisory fees, and which are separate and distinct from the investment management fees payable to Apollo. Apollo will generally recommend or place transactions in no-load or load-waived mutual funds. Some no-load or load-waived mutual funds may charge a transaction fee. Apollo's advisory fees remain exclusive of the additional costs discussed above. Accordingly, clients are encouraged to review their account statements regularly for a full understanding of the fees and charges associated with their accounts. Please see Item 12 below that discusses brokerage related issues in greater detail.

Pension Consulting and/or Financial Planning Fees:

Pension Consulting clients are charged a basis point percentage fee based on the assets under management for the client. This fee is determined at the time Apollo enters into an agreement with the client.

The Firm's pension consulting and financial planning services may also be provided for an hourly fee. The Firm's hourly fee is generally billed at a rate between \$100 to \$200 per hour. Hourly fees may be subject to negotiation but are agreed upon in writing by the parties. Hourly fee-based clients are billed on a monthly basis upon completion of work.

Refund of Fees Paid in Advance: As noted above, clients may choose to have the management fees paid in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess fees will be refunded to the client.

Item 6: Performance-based Fees and Side-by-Side Management

Not applicable.

Item 7: Types of Clients

Apollo provides investment advisory services to individuals, including high net worth individuals, and pension/profit sharing plans.

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

The Firm's security analyses include the following methods:

Fundamental: Fundamental analysis is a general assessment based upon various factors including sale price, asset value, market structure, and history. Apollo will analyze financial condition, capabilities of management, earnings, new products and services, as well as a company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Cyclical: Cyclical analysis is a time-based assessment, which incorporates past and present performance to determine future value. The primary risk of using cyclical analysis is that past performance cannot guarantee future results.

Charting and Technical: Charting consists of preparing a technical analysis using diagrams to illustrate various patterns or progressions in market or account movement. Similar to charting, technical analysis employs the use of statistical models and quantitative methodologies to evaluate performance and value over a specified period of time. Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients, and may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend may eventually reoccur, there is no guarantee that Apollo will be able to accurately predict such a reoccurrence.

Apollo typically recommends investments in equity securities, (including exchange-listed securities, securities traded over-the-counter), mutual fund shares, exchange-traded funds ("ETFs"). The Firm primarily recommends shares of mutual fund and ETFs for client accounts.

Apollo measures and selects mutual funds by using various criteria, such as, but not limited to, the fund manager's tenure, and/or overall career performance. Apollo may recommend, on occasion,

redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Firm may also recommend specific stocks to increase sector weighting and/or dividend potential. All recommendations are made according to clients' specific investment objectives.

The main sources of research information used by the Firm include, but are not limited to: financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, annual reports, corporate rating services, timing services, annual reports, prospectuses, filings with the SEC, and company press releases.

Equity Risks: The market price of securities owned by clients may go up or down, sometimes rapidly or unpredictably. The equity securities in clients' portfolios may decline in value due to factors affecting equity securities markets generally. The values of equity securities may decline due to general market conditions which are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. They may also decline due to factors which affect a particular industry or industries, including the basic minerals sector, such as labor shortages or increased production costs and competitive conditions within an industry. Other risks of investing globally in equity securities may include changes in currency exchange rates, exchange control regulations, expropriation of assets or nationalization, imposition of withholding taxes on dividend or interest payments, and difficulty in obtaining and enforcing judgments against non-U.S. entities.

General Economic and Market Conditions: The success of Apollo's activities is affected by general economic and market conditions, such as changes in interest rates, availability of credit and debt-related issues, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of client investments), trade barriers, unemployment rates, release of economic data, currency exchange controls and national and international political circumstances (including wars, terrorist acts, natural disasters, security operations, the European debt crisis or the U.S. budget negotiations). These factors may affect the level and volatility of securities prices and the liquidity of client investments. Volatility and/or illiquidity could impair a client's profitability or result in losses. clients could incur material losses even if Apollo reacts quickly to difficult market or economic conditions, and there can be no assurance that clients will not suffer material losses and other adverse effects from broad and rapid changes in economic and market conditions in the future. clients should realize that markets for the financial instruments in which Apollo invest client assets can correlate strongly with each other at times or in ways that are difficult for Apollo to predict. Even a well-analyzed approach may not protect clients from significant losses under certain market conditions.

Investment and Trading Risks Generally: All investments risk the loss of capital. No guarantee or representation is or can be made that Apollo's investment program will be successful. Apollo's investment program may involve, without limitation, risks associated with limited diversification, short-selling, commodity interest trading, equity risks, distressed issuers, interest rates, volatility, tracking risks in hedged positions, security borrowing risks in short sales, credit deterioration or default risks, systems risks and other risks inherent in Apollo's activities. Certain investment techniques may, in certain circumstances, substantially increase the impact of adverse market

movements to which Apollo's clients may be subject. In addition, client investments may be materially affected by conditions in the financial markets and U.S. and worldwide economic conditions.

Limited Diversification and Risk Management Failures: At any given time, client assets may not be diversified to any material extent and, as a result, clients could experience significant losses if general economic conditions, and, in particular, those relevant to the issuers whose securities are owned by Apollo clients (i.e., energy-related securities), decline. In addition, client portfolios could become significantly concentrated in a limited number of issuers, types of financial instruments, industries, strategies, countries or geographic regions, and any such concentration of risk may increase losses suffered by clients. This limited diversity could expose clients to losses disproportionate to market movements in general. Other investment funds pursue similar strategies, which creates the risk that many funds may be forced to liquidate positions at the same time, reducing liquidity, increasing volatility and exacerbating losses. Although Apollo attempts to identify, monitor and manage significant risks, these efforts do not take all risks into account and there can be no assurance that these efforts will be effective. Many risk management techniques are based on observed historical market behavior, but future market behavior may be entirely different. Any inadequacy or failure in Apollo's risk management efforts could result in material losses for clients.

Risk of Loss: Investing in securities involves a certain amount of risk of loss that clients should be prepared to bear. Questions regarding these risks and/or increased costs may be addressed with Mr. Ochocinski directly by calling telephone number (716)783-1610.

Item 9: Disciplinary Information

Not applicable.

Item 10: Other Financial Industry Activities and Affiliations

In addition to his advisory duties, Firm owner Mr. Ochocinski serves as Administrator to *America's Family Benefit Plans* ("AFBP"), a pension/defined benefit plan administration firm located in Williamsville, NY. In consideration for his services, Mr. Ochocinski is paid on a contract basis. His work with this firm is full-time in nature and does not conflict with his advisory-based duties. Under no circumstances will Apollo accept a client from AFBP or will AFBP accept a client of Apollo.

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

Apollo has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for employees of the Firm. Where Firm personnel may purchase or sell investments for their personal accounts that they have similarly recommended to clients, the Firm has an ethical obligation to ensure that trading conducted for client accounts is performed in a fair and ethical manner.

While Apollo endeavors at all times to put the interests of its clients first as part of its fiduciary duty, clients should be aware that the personal trading involving recommended securities may create a conflict of interest and may affect the judgment of the individual making the

recommendation. A copy of the Firm's Code of Ethics will be provided to any client upon request.

Item 12: Brokerage Practices

In placing client transactions, Apollo has discretion to select the broker-dealer for client transactions pursuant to the provisions included in its advisory contracts.. Apollo does not provide clients with a list of recommended broker-dealers. The Firm does not receive any type of product, service, compensation or research from the selected broker-dealer. Apollo does not receive research or other products or services other than execution from a broker-dealer or third party in connection with client securities transactions (known as "soft dollar benefits").

Clients may also select or direct the Firm to a preferred broker of their choosing; however, clients should be aware that in directing Apollo to execute transactions through a specific broker, Apollo may be unable to achieve the most favorable execution of client transactions, which may cost the client more money. When clients direct the Firm to their preferred broker, the client may pay higher brokerage commissions because Apollo may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Regardless of the broker-dealer used, brokerage transactions and other brokerage-imposed fees may incur greater cost to the account than expected. Clients are urged to carefully review their brokerage statements. Such fees remain in addition to the Firm's advisory fees.

Item 13: Review of Accounts

William Ochocinski will continuously monitor the underlying securities in client accounts and perform at least quarterly reviews of account holdings for all clients. Mr. Ochocinski will review individually tailored accounts for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. Mr. Ochocinski will review portfolio accounts in the context of the investment objectives and guidelines of the portfolio as well as any investment restrictions provided by the client. More frequent reviews may be triggered by changes in an account holder's personal, tax or financial status. Economic and macroeconomic specific events may also trigger reviews. In addition to the monthly statements and confirmations of transactions that clients receive from their broker dealer, the Firm will provide quarterly performance reports.

The client should generally receive written statements no less than quarterly from the trustee or custodian of record.

In addition, the client may receive other supporting reports from mutual funds, other asset managers, trust companies or custodians, insurance companies, broker-dealers and others involved with the client's account.

The client is encouraged to notify the Firm promptly with any changes to their financial situation.

Item 14: Client Referrals and Other Compensation

Not applicable.

Item 15: Custody

Apollo does not take physical custody of client assets, however, due to its limited authority to deduct advisory fees from client accounts, it is deemed to have constructive custody of client assets. Clients should receive, on a monthly basis, account statements directly from their respective custodians. Clients are urged to carefully review the account statements received from their broker dealer, trustee and/or custodian of record.

Item 16: Investment Discretion

Currently, the majority of Apollo's client accounts are non-discretionary. However, Apollo may maintain discretion of investment funds for client accounts. Discretion is established at the time of the Investment Advisory Agreement and clients may place reasonable limitations on the discretion Apollo exercises.

For clients granting Apollo discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for their account(s), the Firm requests that such authority be granted in writing, typically in the executed advisory agreement.

Should the client wish to impose reasonable limitations on this discretionary authority, such limitations shall be included in this written authority statement. Clients may change/amend these limitations as desired. Such amendments must be submitted to the Firm by the client in writing.

Item 17: Voting Client Securities

As a matter of firm policy, Apollo does not vote proxies on behalf of clients. Therefore, although the firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. The firm does not offer any consulting assistance regarding proxy issues to clients. The firm will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, the Firm will make commercially reasonable efforts to forward such notices in a timely manner. If you have any questions about particular solicitations, you may contact Apollo by telephone at (716) 783-1610.

Item 18: Financial Information

Not applicable.

Item 19: Requirements for State Registered Advisers
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Apollo requires that persons providing investment advice be licensed as investment adviser representatives. Please refer to Part 2B for further information with respect to Firm personnel.

Apollo Wealth Management, LLC

William W. Ochocinski

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www.apollowm.com

April 29, 2020

This Brochure Supplement provides information about William W. Ochocinski that supplements the Apollo Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Should you have any questions about this supplement, or if you have not received the Apollo Wealth Management Brochure, please contact the firm at telephone number (716)783-1610. Additional information about William W. Ochocinski is available on the United State Securities and Exchange Commission ("SEC") website at www.adviserinfo.gov.

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Item 2: Educational Background and Business Experience

Name: William W. Ochocinski, Owner

Year Born: 1959

Education: Niagara University, BS in Biology

Business Experience:

06/2007 to Present Apollo Wealth Management, LLC, Owner and Chief Compliance Officer

1981 to Present America's Family Benefit Plan, Administrator

Professional Designation: Investment Adviser Representative, a designation requiring the successful completion of the Series 65 Exam, also called the Uniform Investment Adviser Law Examination. The Series 65 Exam covers laws, regulations, ethics and topics such as retirement planning, portfolio management strategies and fiduciary responsibilities. The Series 65 qualification exam has 130 multiple choice questions with three hours of testing time and is administered by FINRA.

Item 3: Disciplinary Information

Mr. Ochocinski does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

Items 4 & 5: Other Business Activity and Additional Compensation

As a full-time administrator with America's Family Benefit Plan, Mr. Ochocinski receives additional compensation. Under no circumstances will a client of Apollo Wealth Management, LLC be accepted as a client of *America's Family Benefit Plan*.

Item 6: Supervision

Mr. Ochocinski maintains the responsibility to supervise the operation of his firm. This supervision extends to the ongoing review of the firm's business practices and monitoring all client communications. Questions related to the operation of the firm may be directed to Mr. Ochocinski at the phone number listed on the cover of this Brochure Supplement.

Item 7: Requirements for State Registered Advisers

As previously mentioned in Item 3, Mr. Ochocinski is not subject to any disciplinary history.