

# Singer Wealth Advisors Inc.

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Singer Wealth Advisors Inc. If you have any questions about the contents of this brochure, please contact us at (561) 998-9985 or by email at: [keith@singerwealth.com](mailto:keith@singerwealth.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.*

*Additional information about Singer Wealth Advisors Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Singer Wealth Advisors Inc.'s CRD number is: 170470.*

1515 S. Federal Highway, #211  
Boca Raton, FL33432  
(561) 998-9985  
[www.singerwealth.com](http://www.singerwealth.com)  
[keith@singerwealth.com](mailto:keith@singerwealth.com)

*Registration does not imply a certain level of skill or training.*

Version Date: 07/28/2020

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Singer Wealth Advisors Inc. on March 19, 2020 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- Item 4 and 5 have been updated to disclose that Singer Wealth Management Advisors Inc. no longer participates in a wrap fee program.
- Item 5 has been updated to disclose the new fee schedule.
- Singer Wealth Advisors Inc. has updated their Methods of Analysis. (Item 8)
- Singer Wealth Advisors Inc. has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	2
A. Description of the Advisory Firm.....	2
B. Types of Advisory Services.....	2
C. Client Tailored Services and Client Imposed Restrictions .....	4
D. Wrap Fee Programs.....	<b>Error! Bookmark not defined.</b>
E. Assets Under Management.....	4
Item 5: Fees and Compensation.....	4
A. Fee Schedule.....	4
B. Payment of Fees.....	5
C. Client Responsibility For Third Party Fees.....	6
D. Prepayment of Fees .....	6
E. Outside Compensation For the Sale of Securities to Clients.....	6
Item 6: Performance-Based Fees and Side-By-Side Management .....	6
Item 7: Types of Clients .....	7
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	7
A. Methods of Analysis and Investment Strategies.....	7
B. Material Risks Involved .....	7
C. Risks of Specific Securities Utilized .....	8
Item 9: Disciplinary Information .....	10
A. Criminal or Civil Actions.....	10
B. Administrative Proceedings .....	10
C. Self-regulatory Organization (SRO) Proceedings .....	10
Item 10: Other Financial Industry Activities and Affiliations.....	11
A. Registration as a Broker/Dealer or Broker/Dealer Representative .....	11
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....	11
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	11
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
A. Code of Ethics.....	12
B. Recommendations Involving Material Financial Interests .....	13
C. Investing Personal Money in the Same Securities as Clients.....	13
D. Trading Securities At/ Around the Same Time as Clients' Securities .....	13

Item 12: Brokerage Practices.....	13
A. Factors Used to Select Custodians and/or Broker/Dealers .....	13
1. Research and Other Soft-Dollar Benefits .....	14
2. Brokerage for Client Referrals .....	14
3. Clients Directing Which Broker/Dealer/Custodian to Use .....	14
B. Aggregating (Block) Trading for Multiple Client Accounts .....	14
Item 13: Reviews of Accounts .....	15
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....	15
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	15
C. Content and Frequency of Regular Reports Provided to Clients.....	15
Item 14: Client Referrals and Other Compensation .....	15
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) .....	15
B. Compensation to Non – Advisory Personnel for Client Referrals.....	16
Item 15: Custody.....	16
Item 16: Investment Discretion .....	16
Item 17: Voting Client Securities (Proxy Voting).....	16
Item 18: Financial Information.....	16
A. Balance Sheet .....	16
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	17
C. Bankruptcy Petitions in Previous Ten Years .....	17
Item 19: Requirements For State Registered Advisers .....	<b>Error! Bookmark not defined.</b>
A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background .....	<b>Error! Bookmark not defined.</b>
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any).....	<b>Error! Bookmark not defined.</b>
C. How Performance-based Fees are Calculated and Degree of Risk to Clients .....	<b>Error! Bookmark not defined.</b>
D. Material Disciplinary Disclosures for Management Persons of this Firm .....	<b>Error! Bookmark not defined.</b>
E. Material Relationships That Management Persons Have With Issuers of Securities (If Any) ....	<b>Error! Bookmark not defined.</b>

## **Item 4: Advisory Business**

### ***Business Description***

Our advisory firm is a registered investment adviser in Florida. We provide investment advisory services to individuals, high-net-worth individuals and pension and profit sharing plans concerning various securities, including mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities. As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our clients' interests first and must fully disclose any potential conflict of interest. We do not directly hold customer funds or securities and all transactions are sent to qualified custodians which execute, compare, allocate, clears and settles them. Qualified custodians maintain our clients' accounts and may grant clients access to them.

### **A. Description of the Advisory Firm**

Singer Wealth Advisors Inc. (hereinafter "SWA") is a corporation organized in the State of Florida. We may market under the name Singer Wealth Management.

The firm was formed in January 2014 and the principal owner is Keith Singer.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

SWA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SWA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

SWA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

SWA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of SWA's economic, investment or other financial interests. To meet its fiduciary obligations, SWA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, SWA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is SWA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

### ***Selection of Other Advisers***

SWA may direct clients to third-party investment advisers. Before selecting other advisers for clients, SWA will always ensure those other advisers are properly licensed or registered as investment adviser.

### ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debit/credit planning.

### ***Services Limited to Specific Types of Investments***

SWA does not generally limit its investment advice. Investment advice includes mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities, (although SWA primarily recommends blue chip stocks and ETFs to the majority of its clients), options and private investments. SWA will consider other investments at the request of a client.

On occasion, Singer Wealth Advisors will offer non-publicly traded alternative investments to qualified investors. The standard Singer Wealth Advisors management fee will be assessed and will be documented in the advisory contract

On occasion, Singer Wealth Advisors will present a private lending opportunity to accredited investors. Documentation is provided to the potential investor by the mortgage company.

This investment is purchased directly with the mortgage company; management fees will be collected from the associated Schwab account under SWA management. Asset will not appear in the Schwab account.

The standard Singer Wealth Advisors management fee will be assessed and will be documented in the advisory contract.

### **C. Client Tailored Services and Client Imposed Restrictions**

SWA offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SWA from properly servicing the client account, or if the restrictions would require SWA to deviate from its standard suite of services, SWA reserves the right to end the relationship.

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

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. SWA does not participate in any wrap fee programs.

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

SWA has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$108,484,777	\$0	December 2019

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### ***Asset-Based Fees for Portfolio Management***

##### Non-Wrap Accounts

Total Assets Under Management	Annual Fee
Up to \$1,000,000	2.00%
\$1,000,001 and above	1.50%

These fees, which represent individually managed portfolios, are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of SWA's fees within five

business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

SWA calculates fees in arrears using the value of the account on the last business day of the previous quarter. Fees are withdrawn directly from the client's accounts on a quarterly basis. SWA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

#### Tactical Management Accounts

Fees for Tactical Management Accounts is 2%.

#### ***Selection of Other Advisers Fees***

SWA may direct clients to third-party investment advisers. SWA will receive its standard fee on top of the fee paid to the third party adviser. This relationship will be memorialized in each contract between SWA and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

#### ***Financial Planning Fees***

##### ***Fixed Fees***

The rate for creating client financial plans is between \$1,000 and \$10,000. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

Clients may terminate the agreement without penalty for a full refund of SWA's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

### **B. Payment of Fees**

#### ***Payment of Asset-Based Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears. For the first billing cycle, fees will be prorated as of the date of receipt of the first assets into the clients' accounts.



### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

## **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SWA. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

SWA collects fixed financial planning fees in advance and the remainder of its fees in arrears, as indicated herein. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither SWA nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

SWA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

SWA generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

### *Minimum Account Size for Portfolio Management*

There is an account minimum of \$250,000, which may be waived by SWA in its discretion.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

SWA's methods of analysis include fundamental analysis, and tactical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Tactical analysis** in addition to the fundamental investment strategy offered by SWA, a tactical option of investment that utilizes technical analysis to track and predict the short-term movement of major stock indices. The strategy remains in cash until such time the analysis identifies a "high probability" trade. This strategy is designed for an investor's risk capital. A Spartan Policy Manual has been created for our Cascade Compliance composite returns.

#### *Investment Strategies*

SWA uses long term trading.

Using this method of analysis employs the buy and sell approach through swing trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

## ***Methods of Analysis***

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

## ***Investment Strategies***

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100%

loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

### **Private Lending Opportunities**

- **Default risk:** If the borrower fails to make timely payment that will adversely effect the timing of expected cash flows.
- **Collateral risk:** If the collateral drops in value and the borrower defaults private lenders could lose a portion of their investment.

- **Liquidity risk:** There is a possibility that there will be no secondary market for the loan if the lender wishes to get their money back prior to maturity.
- **Interest rate risk:** Once the loan matures, there is no guarantee that there will be another similar loan to available in which to reinvest the repaid loan proceeds.
- **Servicing risk:** If the loan servicer fails to fulfill their contractual obligations or becomes insolvent a majority of the borrowers will need to appoint a new servicer.
- **Participation risk:** All decisions related to the servicing and management of the loan is subject to a majority of the owners of the loan. It's possible that not all of the investors may agree on the appropriate course of action.

#### **Non-Publicly Traded Alternative Investments**

- **Liquidity risk:** There is a possibility that there will be no secondary market for the loan if the lender wishes to get their money back prior to maturity.
- **Performance risk:** There is risk that the investment will not do well or be profitable
- **May have complex legal and tax considerations**
- **May be highly leveraged**

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

### **Item 9: Disciplinary Information**

#### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

#### **B. Administrative Proceedings**

There are no administrative proceedings to report.

#### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither SWA nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither SWA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Keith Eric Singer, Janyl Smith and Steven Eric Trachtenberg are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. SWA always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of SWA in such individual's outside capacities.

Keith Singer is the owner of Steve's Frozen Chillers, SET Wealth LLC, Vineyards LLC, and Zama LLC.

Keith Singer is a president at Janyl Smith P.A., Insured Returns LLC, and Keith Singer PA.

Roy Daniel Rosner is an investment adviser representative with another firm. From time to time, he will offer clients advice or products from this activity. Singer Wealth Advisors Inc. always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Singer Wealth Advisors Inc. in such individual's outside capacity.

Roy Daniel Rosner is currently the sole owner and sole employee of Futureproof Finances LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Singer Wealth Advisors Inc. always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Singer Wealth Advisors Inc. in such individual's outside capacities.

Zachary Gaynor holds his J.D. from The University of Florida, Levin College of Law. Upon occasion, if there is a need, he will offer to provide clients of Singer Wealth Management legal services, (such as Trusts and Wills). If Mr. Gaynor is engaged in the capacity of attorney, any compensation received is separate and distinct from his Singer Wealth Management income. Clients have the right to decide whether or not to utilize the legal services offered by Mr. Gaynor or any such qualified representative of Singer Wealth Management in such individual's outside capacities. Singer Wealth Management and its representatives will always act in the best interest of the clients. Legal services would not create a conflict of interest.

Zachary Gaynor is a licensed insurance agent. From time to time he will offer clients insurance advice or products. Client should be aware that these services pay a commission and involved a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment advisor. Singer Wealth Management always acts in the best interest of the client including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of Singer Wealth Management in such individual's outside capacities.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

SWA may direct clients to third-party investment advisers. Clients will pay SWA its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between SWA and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. SWA will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. SWA will ensure that all recommended advisers are licensed or notice filed in the states in which SWA is recommending them to clients.

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

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

SWA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. SWA's Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

SWA does not recommend that clients buy or sell any security in which a related person to SWA or SWA has a material financial interest.

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of SWA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of SWA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SWA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, SWA will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

# **Item 12: Brokerage Practices**

## **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on SWA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and SWA may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in SWA's research efforts. SWA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

SWA recommends Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD # 5393), TD Ameritrade Institutional, a division of TD Ameritrade, Inc., and Fidelity Brokerage Services LLC (CRD#7784), Member FINRA/SIPC/NFA.



### ***1. Research and Other Soft-Dollar Benefits***

While SWA has no formal soft dollars program in which soft dollars are used to pay for third party services, SWA may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). SWA may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and SWA does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. SWA benefits by not having to produce or pay for the research, products or services, and SWA will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that SWA's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### ***2. Brokerage for Client Referrals***

SWA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

SWA may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to SWA to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless SWA is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If SWA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SWA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SWA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client portfolio management accounts are reviewed at least annually only by Keith Singer with regard to clients' respective investment policies and risk tolerance levels. All accounts at SWA are assigned to this reviewer. All financial planning accounts are reviewed upon financial plan creation and plan delivery by Keith Singer. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, SWA's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from SWA or the custodian.

Each client will receive the financial plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

SWA may receive compensation from third-party advisers to which it directs clients.

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

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

### **Item 15: Custody**

SWA does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements.

### **Item 16: Investment Discretion**

SWA provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, SWA generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Custody is disclosed in Form ADV because SWA has authority to transfer money from client account(s), which constitutes a standing letter or authorization (SLOA). Accordingly, SWA will follow the safeguards specified by the SEC rather than undergo an annual audit.

### **Item 17: Voting Client Securities (Proxy Voting)**

SWA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

SWA neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

## **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither SWA nor its management has any financial condition that is likely to reasonably impair SWA's ability to meet contractual commitments to clients.

## **C. Bankruptcy Petitions in Previous Ten Years**

SWA has not been the subject of a bankruptcy petition in the last ten years.