

**Sharp Wealth Advisory, LLC  
d/b/a  
The Sharp Financial Group**

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

**Effective: March 28, 2020**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group (“Sharp Financial” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (215) 659-2130.

Sharp Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Sharp Financial to assist you in determining whether to retain the Advisor.

Additional information about Sharp Financial and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 289325.

**The Sharp Financial Group  
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Horsham, PA 19044  
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<http://www.sharpllc.com/wealth>**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Sharp Financial. For convenience, the Advisor has combined these documents into a single disclose document.

Sharp Financial believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Sharp Financial encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The Advisor changed its legal entity name to Sharp Wealth Advisory, LLC. In addition, the Advisor is now wholly owned by Sharp Financial Group, LLC. This amendment does not materially change the control of the Advisor.

The Advisor has changed its principal place of business to 100 Tournament Drive, Suite 310, Horsham, PA 19044.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 289325. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (215) 659-2130.

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#### The Sharp Financial Group

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## Item 4 – Advisory Services

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### A. Firm Information

Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group (“Sharp Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). Sharp Financial is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Pennsylvania. Sharp Financial was founded in December 2008, and is wholly owned by Sharp Financial Group, LLC, which is owned and operated by Michael H. Sharp (Founder). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Sharp Financial.

### B. Advisory Services Offered

Sharp Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans and family office (each referred to as a “Client”).

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

#### Wealth Management Services

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

*Investment Management Services* - Sharp Financial provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Sharp Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Sharp Financial adopts a tactical approach to investment management. The Advisor develops proprietary risk based investment strategies built on internal research and quantitative analysis provided by a third party subscription. Sharp Financial receives daily market data, market trend indicators and asset class/sector rankings based on technical components including but not limited to supply and demand, moving average, relative strength and momentum based approaches. The Advisor utilizes a strategy based off diversification and risk mitigation. Each strategy has pre-determined rebalance frequencies as well as the potential to reallocate upon a change in market indicators. The strategies consist of mutual funds and/or exchange-traded funds (“ETFs”) with exposure to traditional asset classes, equity sectors, bond sectors, commodities, leverage and inverse. The underlying asset allocation weightings for each strategy are dynamic and can shift significantly as changes in market indicators occur. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Sharp Financial's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Sharp Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Sharp Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Sharp Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Sharp Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Sharp Financial may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating

cash to meet Client needs, due to market conditions, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Sharp Financial accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices

*Financial Planning Services* - Sharp Financial will typically provide a variety of financial planning and consulting services to Clients. Services are tailored to the Client, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, tax planning, insurance needs, estate planning and other areas of a Client's financial situation.

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

Sharp Financial may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary.

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

*Use of Independent Managers* - Sharp Financial may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

#### Retirement Plan Advisory Services

Sharp Financial provides retirement plan advisory services to retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Performance Reporting
- Ongoing Investment Recommendation and Assistance (ERISA 3(21) Services)
- ERISA 404(c) Assistance

These services are provided by Sharp Financial serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Sharp Financial’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

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

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

- Establishing an Investment Strategy – Sharp Financial, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Sharp Financial will develop a tactical asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Sharp Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Sharp Financial will provide investment management and ongoing oversight of the Client’s investment portfolio.

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

Sharp Financial typically includes, in addition to securities transaction fees for certain mutual funds and custodial costs (herein “Covered Costs”) together with its investment advisory fees. Including these fees into a single asset-based fee is considered a “Wrap Fee Program Brochure”. The Advisor customizes its wealth management services for its Clients and certain Clients may not participate in the Wrap Fee Program Brochure. The Advisor sponsors the Sharp Financial Wrap Fee Program Brochure solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client’s account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

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

As of December 31, 2019, Sharp Financial manages \$145,866,658 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

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

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined fee for investment management and financial planning services based on the market value of assets under management.

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	2.00%
\$500,001 to \$1,000,000	1.50%
\$1,000,001 to \$2,000,000	1.00%
Over \$2,000,000	0.75%

Fees may vary from the above fee schedule depending on the nature and complexity of each Client's circumstances, or with the inclusion of financial planning or other services, pursuant to the terms of the wealth management agreement.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees are negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Sharp Financial will be independently valued by the Custodian. Sharp Financial will not have the authority or responsibility to value portfolio securities.

*Use of Independent Managers* - For Clients referred by the Advisor to an Independent Manager, the Client's fee will be deducted from the Client's account[s] with the Custodian. The Independent Manager will separately bill the Advisor. The Advisor does not receive any additional compensation or fees from the Independent Manager.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 2.00%, paid quarterly in advance pursuant to the terms of the retirement plan advisory agreement. Fees may be negotiable depending on the size and complexity of the Plan. Certain existing Clients may have fee schedules that differ from the schedule below. Fee ranges are generally based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$500,000	2.00%
\$500,001 to \$1,000,000	1.50%
\$1,000,001 to \$2,000,000	1.00%
Over \$2,000,000	0.75%

## **B. Fee Billing**

### Wealth Management Services

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Sharp Financial at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Sharp Financial to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

*Use of Independent Managers* - For Clients referred by the Advisor to an Independent Manager, the Client's fee will be deducted from the Client's account[s] by the Advisor and a portion of the investment advisory fee will be provided to the Independent Manager.

### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

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



Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Sharp Financial typically includes Covered Costs as part of its overall investment advisory fee through the Sharp Financial Wrap Fee Program Brochure. Securities transaction fees for Client-directed trades may be charged back to the Client. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Sharp Financial for investment advisory services or part of the Sharp Financial Wrap Fee Program Brochure are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Sharp Financial, but would not receive the services provided by Sharp Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Sharp Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Wealth Management Services

Sharp Financial is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

*Use of Independent Managers* - In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Sharp Financial will assist the Client with the termination and transition as appropriate.

##### Retirement Plan Advisory Services

Sharp Financial is compensated for its services in advance of the quarter in which retirement plan services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

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

Sharp Financial does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, the Advisory Person may implement securities transactions under PKS and not through Sharp Financial. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company



products. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, the Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

Sharp Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

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## **Item 7 – Types of Clients**

Sharp Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans and family offices in Commonwealth of Pennsylvania and other states. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Sharp Financial generally requires a minimum household size for establishing a relationship of \$1,000,000 to effectively implement its investment process. The minimum household size may be waived at the sole discretion of the Advisor.

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

### **A. Methods of Analysis**

Sharp Financial employs a fundamental, technical, cyclical and charting analysis methods in developing investment strategies for its Clients. Research and analysis from Sharp Financial are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis 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 will eventually reoccur, there is no guarantee that Sharp Financial will be able to accurately predict such a reoccurrence.

*Cyclical analysis* is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Sharp Financial is recommending. The risks with cyclical analysis are similar to those of technical analysis.

*Charting analysis* utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

As noted above, Sharp Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Sharp Financial may hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Sharp Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Sharp Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach.

Clients should also consider the following risks:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall

financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

#### Leveraged ETFs

Leveraged ETFs seek to deliver multiples of the performance of the index or benchmark they track. These ETFs attempt to deliver some multiple of an index's daily returns (positive or negative). Please consider the implications to both the upside and the downside of multipliers. While it may seem that a 2x multiplier is a benefit in an up-market cycle it is important to remember that the same multiplier applies when the ETF moves against the market. This could potentially result in significant losses, and highlights the additional risk associated with Leveraged ETFs.

#### Inverse ETFs

Inverse ETFs (also called "short" funds) seek to deliver the opposite of the performance of the index or benchmark they track. Like traditional ETFs, some leveraged and inverse ETFs track broad indices, some are sector-specific, and others are linked to commodities, currencies, or some other benchmark. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward moving markets.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to**

discuss these risks with the Advisor.

## Item 9 – Disciplinary Information

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**There are no legal, regulatory or disciplinary events involving Sharp Financial or any of its management persons.** Sharp Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by the Advisor's firm name or CRD# 289325.

## Item 10 – Other Financial Industry Activities and Affiliations

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### Broker-Dealer Affiliation

As noted in Item 5 above, Advisory Persons are also a registered representative of PKS. In one's separate capacity as a registered representative, Advisory Persons will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in Advisory Persons' separate capacity as a registered representative.

### Insurance Agency Affiliations

As noted in Item 5 above, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Sharp Financial. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Advisory Persons.

### Additional Business Affiliations

Mr. Sharp is also the Founder of Michael H. Sharp & Associates, LLC and Michael H. Sharp Management, PC. Michael H. Sharp & Associates is an integrated accounting, tax and business advisory services firm. Michael H. Sharp Management, PC is a management company. Mr. Sharp, through the Donald V. Selkow Irrevocable Deed of Trust manages the property of a trust. He is also the managing member of Blake Family Holdings, LLC.

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

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

Sharp Financial has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Sharp Financial ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Sharp Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Sharp Financial's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (215) 659-2130.

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

Sharp Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Sharp Financial does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Sharp Financial does not have a material interest in any securities traded in Client accounts.

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

Sharp Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Sharp Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

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

While Sharp Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Sharp Financial, or any Supervised Person of Sharp Financial, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Sharp Financial does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Sharp Financial to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Sharp Financial does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Sharp Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a custodian not recommended by Sharp Financial. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not utilized. Sharp Financial may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. The Advisor typically recommends that Clients establish accounts at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and member FINRA/SIPC. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. The Advisor receives some benefits from TD Ameritrade through its participation in the program. Please see the Item 14 below.

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

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Sharp Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Sharp Financial does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Sharp Financial will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client



accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Sharp Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Sharp Financial will execute its transactions through the Custodian as directed by the Client. Sharp Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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

Securities in Client accounts are monitored on a regular and continuous basis by April Collins, Chief Compliance Officer of Sharp Financial. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Sharp Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Sharp Financial**

Sharp Financial is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Sharp Financial does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Sharp Financial may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Sharp Financial may receive non-compensated referrals of new Clients from various third-parties.

### **Participation in Institutional Advisor Platform**

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although

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

The Advisor also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program, including assistance with costs for various third-party software programs. The Advisor's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Advisor, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Advisor, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Advisor may have an incentive to recommend to its Clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Advisor's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

#### Use of Independent Managers

The Advisor may be indirectly compensated by an Independent Manager as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

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

Sharp Financial does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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Sharp Financial does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Sharp Financial to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Sharp Financial to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

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

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**The Sharp Financial Group**  
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Phone: (215) 659-2130 | (215) 659-2170  
[www.sharpllc.com/wealth](http://www.sharpllc.com/wealth)



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Sharp Financial generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Sharp Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Sharp Financial will be in accordance with each Client's investment objectives and goals.

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

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

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

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

**Sharp Wealth Advisory, LLC  
d/b/a  
The Sharp Financial Group**

**Form ADV Part 2A – Appendix 1  
("Wrap Fee Program Brochure")**

**Effective: March 28, 2020**

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group ("Sharp Financial" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the Sharp Financial Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Sharp Financial Disclosure Brochure or you have any questions about the content of this Wrap Fee Program Brochure or the Sharp Financial Disclosure Brochure, please contact the Advisor at (215) 659-2130 or by email at [info@sharppllc.com](mailto:info@sharppllc.com).

Sharp Financial is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about Sharp Financial to assist you in determining whether to retain the Advisor.

Additional information about Sharp Financial and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 289325.

**Item 2 – Material Changes**

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Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee programs offering by the Advisor.

Material Changes

There have been no material changes to this Wrap Fee Program Brochure since the last distribution to Clients.

Future Changes

From time to time, the Advisor may amend this Wrap Fee Program Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete Sharp Financial Disclosure Brochure) or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Sharp Financial.

At any time, the Advisor may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 289325. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (215) 659-2130.

**Item 3 – Table of Contents**

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## Item 4 – Services Fees and Compensation

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### A. Services

Sharp Financial provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Sharp Financial Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Sharp Financial as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, Sharp Financial includes, in addition to securities transaction fees for certain mutual funds and custodial costs (herein “Covered Costs”) as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor’s recommended Custodian does not charge securities transaction fees for exchange-traded fund (“ETF”) and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. The Advisor sponsors the Sharp Financial Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of Covered Costs into a single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the Sharp Financial Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Sharp Financial’s investment philosophy and related services.**

### B. Program Costs

Advisory services provided by Sharp Financial are offered in a wrap fee structure whereby Covered Costs are included in the overall investment advisory fee paid to Sharp Financial. As the level of activity in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the Covered Costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity or other Covered Costs. A Wrap Fee structure presents a conflict of interest as the Advisor is incentivized to limit the number of trades placed in the Client’s account[s] or to utilize securities that do not have transaction fees. The Advisor’s recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. As such, the Advisor is incentivized to utilize ETFs and other equity securities to limit the overall cost to the Advisor. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### C. Fees

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
Up to \$500,000	2.00%
\$500,001 to \$1,000,000	1.50%
\$1,000,001 to \$2,000,000	1.00%
Over \$2,000,000	0.75%

Fees may vary from the above fee schedule depending on the nature and complexity of each Client’s circumstances, or with the inclusion of financial planning or other services, pursuant to the terms of the wealth management agreement.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees are negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Sharp Financial will be independently valued by the Custodian. Sharp Financial will not have the authority or responsibility to value portfolio securities.

As noted above, the Wrap Fee Program Brochure includes Covered Costs incurred in connection with the discretionary wealth management services provided by Sharp Financial. Securities transaction fees for Client-directed trades may be charged back to the Client.

In addition, all fees paid to Sharp Financial for investment advisory services or part of the Wrap Fee Program Brochure are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Securities transaction fees for Client-directed trades will be charged back to the Client. In connection with the discretionary investment management services provided by Sharp Financial, the Client may also incur other costs assessed by other third parties, other than Covered Costs noted above, such as wire transfer fees, fees for trades executed away from the Custodian and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by Sharp Financial to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **D. Compensation**

Sharp Financial is the sponsor and portfolio manager of this Wrap Fee Program Brochure. Sharp Financial receives investment advisory fees paid by Clients for participating in the Wrap Fee Program Brochure and pays the Covered Costs associated with the management of the Client's account[s].

### **Item 5 – Account Requirements and Types of Clients**

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Sharp Financial offers investment advisory services to individuals, high net worth individuals, trusts, estates, retirement plans and family offices. Sharp Financial generally requires a minimum household size for establishing a relationship of \$1,000,000 to effectively implement its investment process. The minimum household size may be waived at the sole discretion of the Advisor. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

### **Item 6 – Portfolio Manager Selection and Evaluation**

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#### **Portfolio Manager Selection**

Sharp Financial serves as sponsor and as portfolio manager for the services under this Wrap Fee Program Brochure.

#### **Related Persons**

Sharp Financial personnel serve as portfolio managers for this Wrap Fee Program Brochure. Sharp Financial does not serve as a portfolio manager for any third-party wrap fee programs.

#### **Performance-Based Fees**

Sharp Financial does not charge performance-based fees.

#### **Supervised Persons**

Sharp Financial Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

#### **Methods of Analysis**

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

#### **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Sharp Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### **Proxy Voting**

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

### **Item 7 – Client Information Provided to Portfolio Managers**

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Sharp Financial is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program Brochure. Please also see the Sharp Financial Privacy Policy (included after this Wrap Fee Program Brochure).

### **Item 8 – Client Contact with Portfolio Managers**

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Sharp Financial is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Sharp Financial.

### **Item 9 – Additional Information**

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#### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

Sharp Financial values the trust you place in the Advisor. The Advisor encourages you to perform the requisite due diligence on any advisor or service provider with whom you partner. The backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for the Advisor's firm name or CRD# 289325. Please see Item 9 of the Sharp Financial Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Items 10 and 14 of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

Sharp Financial has implemented a Code of Ethics that defines fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Sharp Financial's compliance program ("Supervised Persons"). Complete details on the Sharp Financial Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Sharp Financial under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

#### Other Compensation

##### Participation in Institutional Advisor Platform

The Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.) Sharp Financial may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by Sharp Financial or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

##### Client Referrals from Solicitors

Sharp Financial does not engage paid solicitors for Client referrals.

##### Financial Information

Neither Sharp Financial, nor its management has any adverse financial situations that would reasonably impair the ability of Sharp Financial to meet all obligations to its Clients. Neither Sharp Financial, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Sharp Financial is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 of the Form ADV Part 2A – Disclosure Brochure.

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#### **The Sharp Financial Group**

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[www.sharpllc.com/wealth](http://www.sharpllc.com/wealth)



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

**for**

**Michael H. Sharp, CPA  
Founder**

**Effective: March 28, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael H. Sharp, CPA (CRD# 2948922) in addition to the information contained in the Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group (“Sharp Financial” or the “Advisor”, CRD# 289325) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Sharp Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (215) 659-2130 or by email at [info@sharppllc.com](mailto:info@sharppllc.com).

Additional information about Mr. Sharp is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2948922.

## Item 2 – Educational Background and Business Experience

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Michael H. Sharp, CPA, born in 1961, is dedicated to advising Clients of Sharp Financial as the Founder of the firm. Mr. Sharp is also a Registered Representative of Purshe Kaplan Sterling Investments, Inc. Prior to the establishment of Sharp Financial he accrued twenty years of wealth management experience as a Registered Representative with HD Vest Investment Services. In addition, Michael founded Michael H. Sharp & Associates, LLC in 1993. The firm provides integrated accounting, tax, and business advisory services to entrepreneurs, high net worth individuals and family offices in the mid-Atlantic region. His academic credentials include a Bachelor of Science in Accounting from Slippery Rock University. Michael holds the designation of Certified Public Accountant and has also passed the Series 6, Series 7, Series 63 and Series 65 exams administered by NASD.

### Certified Public Accountant (“CPA”)

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

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Sharp.*** Mr. Sharp has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Sharp.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Sharp.***

However, the Advisor does encourage you to independently view the background of Mr. Sharp on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2948922.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Sharp is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Sharp's separate capacity as a registered representative, Mr. Sharp will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Sharp. Neither the Advisor nor Mr. Sharp will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Sharp's separate capacity as a registered representative.

#### Insurance Agency Affiliations

Mr. Sharp is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Sharp's role with Sharp Financial. As an insurance professional, Mr. Sharp will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Sharp is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Sharp or the Advisor.

#### **Item 5 – Additional Compensation**

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

#### **Item 6 – Supervision**

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Mr. Sharp serves as the Founder of Sharp Financial and is supervised by April Collins, the Chief Compliance Officer. Ms. Collins can be reached at (215) 659-2130.

Sharp Financial has implemented a Code of Ethics, and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sharp Financial. Further, Sharp Financial is subject to regulatory oversight by various agencies. These agencies require registration by Sharp Financial and its Supervised Persons. As a registered entity, Sharp Financial is subject to examinations by regulators, which may be announced or unannounced. Sharp Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Edward V. Rimbenieks  
Wealth Advisor Associate**

**Effective: March 28, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Edward V. Rimbenieks (CRD# 4616210) in addition to the information contained in the Sharp Financial d/b/a The Sharp Financial Group (“Sharp Financial” or the “Advisor”, CRD# 289325) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Sharp Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (215) 659-2130 or by email at [info@sharpplc.com](mailto:info@sharpplc.com).

Additional information about Mr. Rimbenieks is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4616210.

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## Item 2 – Educational Background and Business Experience

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Edward V. Rimbenieks, born in 1980, is dedicated to servicing clients of Sharp Financial as a Wealth Advisor Associate. Mr. Rimbenieks is also a Registered Representative of Purshe Kaplan Sterling Investments, Inc. Prior to joining Sharp Financial he served as a Registered Representative of The Vanguard Group. Edward's academic credentials include a Bachelor of Science in Finance from West Chester University. He also passed the Series 7 and Series 66 exams administered by the NASD.

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## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Rimbenieks.*** Mr. Rimbenieks has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rimbenieks.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Rimbenieks.***

However, the Advisor does encourage you to independently view the background of Mr. Rimbenieks on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4616210.

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## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Rimbenieks is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Rimbenieks's separate capacity as a registered representative, Mr. Rimbenieks will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Rimbenieks. Neither the Advisor nor Mr. Rimbenieks will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Rimbenieks's separate capacity as a registered representative.

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## Item 5 – Additional Compensation

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

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## Item 6 – Supervision

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Mr. Rimbenieks serves as a Wealth Advisor Associate of Sharp Financial and is supervised by April Collins, the Chief Compliance Officer. Ms. Collins can be reached at (215) 659-2130.

Sharp Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sharp Financial. Further, Sharp Financial is subject to regulatory oversight by various agencies. These agencies require registration by Sharp Financial and its Supervised Persons. As a registered entity, Sharp Financial is subject to examinations by regulators, which may be announced or unannounced. Sharp Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Justin M. Kohler  
Wealth Advisor**

**Effective: March 28, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Justin M. Kohler (CRD# 6192781) in addition to the information contained in the Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group (“Sharp Financial” or the “Advisor”, CRD# 289325) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Sharp Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (215) 659-2130 or by email at [info@sharppllc.com](mailto:info@sharppllc.com).

Additional information about Mr. Kohler is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6192781.

## Item 2 – Educational Background and Business Experience

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Justin M. Kohler, born in 1991, is dedicated to advising Clients of Sharp Financial as a Wealth Advisor. Mr. Kohler is also a Registered Representative of Purshe Kaplan Sterling Investments, Inc. Prior to joining Sharp Financial, Mr. Kohler served as a Financial Advisor with Axa Advisors. Mr. Kohler also earned a Bachelors of Science in Finance from Saint Joseph's University in 2013. He also passed the Series 7 and Series 65 exams administered by the NASD.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Kohler.*** Mr. Kohler has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kohler.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kohler.***

However, the Advisor does encourage you to independently view the background of Mr. Kohler on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6192781.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Kohler is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mr. Kohler's separate capacity as a registered representative, Mr. Kohler will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kohler. Neither the Advisor nor Mr. Kohler will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Kohler's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Kohler is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Kohler's role with Sharp Financial. As an insurance professional, Mr. Kohler will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kohler is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kohler or the Advisor.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Kohler serves as a Wealth Advisor of Sharp Financial and is supervised by April Collins, the Chief Compliance Officer. Ms. Collins can be reached at (215) 659-2130.

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



may be announced or unannounced. Sharp Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Tasha D. Miles**  
**Wealth Advisor**

**Effective: March 28, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Tasha D. Miles (CRD# 5831261) in addition to the information contained in the Sharp Wealth Advisory, LLC (“Sharp Financial” or the “Advisor”, CRD# 289325) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Sharp Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (215) 659-2130 or by email at [info@sharppllc.com](mailto:info@sharppllc.com).

Additional information about Mrs. Miles is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5831261.

## Item 2 – Educational Background and Business Experience

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Tasha D. Miles, born in 1977, is dedicated to advising Clients of Sharp Financial as a Wealth Advisor. Mrs. Miles is also a Registered Representative of Purshe Kaplan Sterling Investments, Inc. Prior to joining Sharp Financial, she spent several years in Finance and Sales with Johnson and Johnson. Mrs. Miles earned a Bachelor of Science in Finance from Hampton University in 1999. She has also passed the Series 7, Series 65 and Series 63 exams administered by the NASD.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mrs. Miles.*** Mrs. Miles has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Miles.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Miles.***

However, the Advisor does encourage you to independently view the background of Mrs. Miles on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5831261.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mrs. Miles is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Mrs. Miles’ separate capacity as a registered representative, Mrs. Miles will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mrs. Miles. Neither the Advisor nor Mrs. Miles will earn ongoing investment advisory fees in connection with any products or services implemented in Mrs. Miles’ separate capacity as a registered representative.

### Insurance Agency Affiliations

Mrs. Miles is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Miles’ role with Sharp Financial. As an insurance professional, Mrs. Miles will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Miles is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Miles or the Advisor.

### Real Estate

Mrs. Miles is also a licensed real estate agent. Implementations of real estate transactions are separate and apart from Mrs. Miles’ role with Sharp Financial. As a real estate professional, Mrs. Miles may receive customary real estate commissions from real estate transactions. Clients are under no obligation to utilize Mrs. Miles or the Advisor for any real estate transaction.

## Item 5 – Additional Compensation

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

## **Item 6 – Supervision**

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Mrs. Miles serves as a Wealth Advisor of Sharp Financial and is supervised by April Collins, the Chief Compliance Officer. Ms. Collins can be reached at (215) 659-2130.

Sharp Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sharp Financial. Further, Sharp Financial is subject to regulatory oversight by various agencies. These agencies require registration by Sharp Financial and its Supervised Persons. As a registered entity, Sharp Financial is subject to examinations by regulators, which may be announced or unannounced. Sharp Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: March 28, 2020

### Our Commitment to You

Sharp Wealth Advisory, LLC d/b/a The Sharp Financial Group ("Sharp Financial" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Sharp Financial (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information the Advisor has and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Sharp Financial does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.  Sharp Financial shares Client information with PKS This sharing is due to the oversight PKS has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Sharp Financial does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Sharp Financial or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Sharp Financial does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (215) 659-2130 or by email at [info@sharpplc.com](mailto:info@sharpplc.com).