

SilverLake Wealth Management LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 19, 2020

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of SilverLake Wealth Management LLC (“SilverLake” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

SilverLake 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 SilverLake to assist you in determining whether to retain the Advisor.

Additional information about SilverLake and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor firm name or CRD# 165525.

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Item 2 – Material Changes

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 Advisory Persons of SilverLake. For convenience, the Advisor has combined these documents into a single disclosure document.

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

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor utilizes independent managers, please see Items 4 and 5 for more information.

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 in the business practices of SilverLake.

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 by searching with the Advisor's firm name or CRD# 165525. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

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Item 4 – Advisory Services

A. Firm Information

SilverLake Wealth Management LLC (“SilverLake” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). SilverLake was organized as a Limited Liability Company (“LLC”) under the laws of the State of Vermont in March 2002. SilverLake became a registered investment advisor in December 2012. SilverLake is owned and operated by Managing Partners, Richard J. Briand, Robert Eddy, Thomas Golonka, Theodore Riehle, and Jeffrey Steele. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SilverLake.

B. Advisory Services Offered

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

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. SilverLake’s fiduciary commitment 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.

Investment Management Services

SilverLake’s investment philosophy is customized to the needs of each Client based on a deep understanding of the Client’s long-term goals. SilverLake provides continuous personal Client contact and interaction while providing investment management and consulting services. SilverLake primarily offers discretionary and non-discretionary investment management services, but Client’s may request such services to be provided on a non-discretionary basis. SilverLake works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

SilverLake will then construct a portfolio, consisting of individual equity securities, individual fixed income securities, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize other investment types, as appropriate, to meet the needs of its Clients. Diversification is sought to reduce overall portfolio risk, which can include using different asset classes as well as different sectors/industries.

Depending on the needs of each Client, SilverLake may create a customized portfolio or invest all or a portion of Client assets in its model portfolios. Portfolio construction strategy is developed based on the needs of each Client, including such factors as other investments, tax sensitivity, and/or the alignment of a SilverLake portfolio with a Client’s particular needs.

SilverLake will select, recommend and/or retain mutual funds on a fund by fund basis. Due to specific custodial and/or mutual fund company constraints, material tax consideration, and/or systematic investment plans, SilverLake will select, recommend and/or retain a mutual fund share class that does not have trading costs, but do have higher internal expense ratios than institutional share classes. SilverLake will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client’s financial objectives and stated investment guidelines.

SilverLake’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. SilverLake 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 the acceptance by the Advisor.

SilverLake evaluates and selects investments for inclusion in Client portfolios only after applying their internal due diligence process. SilverLake may recommend, on occasion, redistributing investment allocations to diversify

the portfolio. SilverLake 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. SilverLake 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 the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Non-Purpose Loans – The Advisor may introduce certain Clients to non-purpose loan program made available through certain Custodians' banking partner affiliates ("Lending Program"). In such instances, the Client's assets in their account[s] at the Custodian will be utilized as collateral for a non-purpose loan. The recommendation of a Lending Program presents a conflict of interest as the Advisor will continue to receive investment advisory fees for managing the collateralized assets in the Client's account[s]. Clients are not obligated to engage the Advisor for the Lending Program. For additional information related to the risks involved non-purpose loans and lines of credit, please see Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.

At no time will SilverLake 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 the designated account[s] at the Custodian, pursuant to the terms of the agreement. Please see Item 12 – Brokerage Practices for additional information.

Financial Planning Services

SilverLake will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients 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, insurance needs, 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.

SilverLake may also refer Clients to an accountant, attorney or another specialist, 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 planning engagements that encompass an ad-hoc analysis, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations poses 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 engage the Advisor for investment management services or to 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 any transaction through the Advisor.

Retirement Plan Advisory Services

SilverLake provides retirement plan advisory services on behalf of the 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
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

SilverLake may also provide communication and education services to the Plan and its Participants, pursuant to the terms of the Advisor’s agreement with each Plan Sponsor:

- Plan Participant contact by phone, e-mail or letter upon eligibility to promote enrollment
- Investment education
- Regular on-site advisor visits with staff for account updates and reviews
- Periodic company-wide employee survey of retirement plan understanding
- Periodic Plan Participant group education

These services are provided by SilverLake 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 SilverLake’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

Use of Independent Managers

SilverLake will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment management agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager’s Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

C. Client Account Management

Prior to engaging SilverLake to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client.

These services may include:

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

D. Wrap Fee Programs

When in the Client’s best interest SilverLake will include the securities transaction fees together with investment advisory fees to provide the Client with a single, bundled fee structure. This combination of fees is typically referred to as a “Wrap Fee Program”. SilverLake customizes its investment management services for Clients. This Wrap Fee Program Brochure is included as Appendix 1 to this Disclosure Brochure solely to discuss the fees and potential conflicts associated with a bundled fee. 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 the Form ADV 2A - Appendix 1 ("Wrap Fee Program Brochure"), which is always included with this Disclosure Brochure.

E. Assets Under Management

As of December 31, 2019, SilverLake manages \$168,930,862 in Client assets, \$144,543,023 of which are managed on a discretionary basis and \$24,387,839 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

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 one or more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

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 market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 0.50% to 1.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Investment advisory fees are negotiable upon the sole discretion of the Advisor and the agreed-upon fee will be included in the investment advisory agreement. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by SilverLake will be independently valued by the Custodian. SilverLake will not have the authority or responsibility to value portfolio securities.

Financial Planning Services

SilverLake offers financial planning services on an hourly basis at a rate of up to \$300 per hour or on a fixed fee basis, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or total costs will be determined prior to engaging for these services. The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.50% and are billed in advance, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan.

Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or the Custodian [on behalf of the Advisor] and deducted from the Client account[s] at the Custodian. Clients authorize the calculation and deduction of the investment advisory fee through the investment advisory agreement and the contractual arrangement[s] between the Custodian and the Client. The amount due is calculated by applying the quarterly rate (annual rate divided by four (4)) to the total assets under management with SilverLake at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory 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 advisory fees to be deducted by SilverLake from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees are invoiced by the Advisor upon completion of the engagement deliverable[s] and are due upon receipt.

Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are negotiated with the Plan Sponsor on a case-by-case basis and may be billed as a fixed quarterly fee or as a percentage of the market value of assets in the Plan at the end of the prior calendar quarter.

Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees may include SilverLake's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

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]. SilverLake includes securities transactions costs as part of its overall investment advisory fee through the SilverLake Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure. The inclusion of securities transaction fees into a single bundled fee may cost the Client more or less than if paid separately.

In addition, all fees paid to SilverLake for investment advisory services 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 SilverLake, but would not receive the services provided by SilverLake which are designed, among other things, to assist the Client in determining which products or services are most appropriate to 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 SilverLake to fully understand the total fees to be paid. Additionally, as noted above, the Advisor will select share classes which do not have trading costs, but do have higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management and Retirement Plan Advisory Services

SilverLake is compensated for its advisory services in advance of the quarter in which services are rendered. Either party may terminate the agreement with SilverLake, 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 then refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's advisory agreement with the Advisor is non-transferable without Client's prior consent.

Financial Planning Services

SilverLake is compensated for its financial planning services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement with SilverLake, at any time, by providing advance written notice to the other party. The Client may also terminate the agreement within five (5) business days of signing the Advisor's financial planning 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 Client's financial planning agreement with the Advisor is non-transferable without Client's prior consent.

Retirement Plan Advisory Services

SilverLake is compensated for its services at the beginning of the quarter before advisory 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 shall be responsible for retirement plan advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid retirement plan 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.

Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. SilverLake will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

SilverLake 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 LPL Financial, LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In one's separate capacity as a registered representative of LPL Financial, the Advisory Person will implement securities transactions under LPL Financial and not through SilverLake. 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. These persons will 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 persons providing investment advice on behalf of the Advisor who are insurance agents have 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 person affiliated with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

Item 7 – Types of Clients

SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans. 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. SilverLake generally does not impose a minimum size for establishing a relationship.

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

A. Methods of Analysis

SilverLake primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research data and analysis from SilverLake 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. As noted above, SilverLake generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SilverLake will typically 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, SilverLake 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.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria consist generally of 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 AA will be able to accurately predict such a reoccurrence.

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. SilverLake 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:

Market Risk

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 have 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.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

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.

Non-Purpose Loans and Lines of Credit

Non-purpose loans and lines of credit carry a number of risks, including but not limited to the risk of a market downturn, tax implications if collateralized securities are liquidated, and an increase in interest rates. A decline in the market value of collateralized securities held in the account[s] at the Custodian, may result in a reduction in the draw amount of the Client's line of credit, a demand from the Lending Program that the Client deposit additional funds or securities in the Client's collateral account[s], or a forced sale of securities in the Client's collateral account[s].

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

There are no legal, regulatory or disciplinary events involving SilverLake or any of its management persons. SilverLake and its advisory personnel value the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that you engage. The backgrounds of the Advisor and its Advisory Persons are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 165525.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5, certain Advisory Persons of SilverLake are also registered representatives of LPL Financial, LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In their separate capacities as registered representatives of LPL, Advisory Persons will receive compensation for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons of SilverLake. Neither SilverLake nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons of SilverLake are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with the SilverLake. As insurance professionals, Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are 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 Advisory Persons or the Advisor.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

A. Code of Ethics

SilverLake has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SilverLake ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. SilverLake and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SilverLake associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may address employee ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (802) 857-5083 or via email at info@silverlakewealth.com.

B. Personal Trading with Material Interest

SilverLake allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SilverLake 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. SilverLake does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

SilverLake 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, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of SilverLake 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 SilverLake requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of Supervised Persons, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While SilverLake 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 SilverLake or any Supervised Person of SilverLake, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

SilverLake 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 SilverLake to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, SilverLake does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where SilverLake does not exercise discretion over the selection of the Custodian, the Advisor will typically recommend the Custodian[s] to Clients. SilverLake will typically recommend LPL as a Custodian due to the affiliation its Advisory Persons have with LPL. SilverLake may also recommend that Clients establish accounts at Charles Schwab, Inc. ("Schwab") or Fidelity Clearing & Custody Solutions and other divisions of Fidelity Investments, Inc. ("Fidelity"). Clients are not obligated to use any Custodian recommended by SilverLake, however, Because of SilverLake's affiliation with LPL, the Advisor may be limited in the services it can offer if a Custodian is selected that is not approved by LPL. SilverLake does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those generally obtainable through other Custodians. As a result of the Advisor's relationship with LPL, LPL may have access to certain confidential information regarding the Client's account[s], including any accounts held at Schwab or Fidelity. This confidential information may include personal information, financial information, portfolio holdings, transactions and other information. For a copy of LPL's privacy policy, please contact us at (802) 857-5083 or by email at info@silverlakewealth.com.

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

SilverLake Wealth Management LLC
33 Blair Park Road, Suite 100, Williston, VT 05495
Phone: (802) 857-5083 * Fax: (802) 857-5082
www.silverlakewealth.com

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. **SilverLake does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives economic benefits from its relationship with LPL and Schwab. Please see Item 14 below.**

2. Brokerage Referrals - SilverLake 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 SilverLake 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 designated 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]). SilverLake 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. SilverLake will execute its transactions through the Custodian as authorized by the Client.

SilverLake may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. 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 particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Principals of SilverLake, which may periodically include the CCO. 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 SilverLake if changes occur in his/her personal financial situation that might adversely affect his/her 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

A. Compensation Received by SilverLake

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www.silverlakewealth.com

Participation in Institutional Advisor Platforms (LPL)

SilverLake has established an institutional relationship with LPL to assist the Advisor in managing Client account[s]. Access to the LPL platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at LPL. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its 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 from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

The owners and Advisory Persons of SilverLake are also registered representatives of LPL Financial. During the initial start-up of the Advisor in 2012, owners of SilverLake received transition assistance from LPL Financial to assist the Advisor in its transition to LPL Financial. The transition assistance included forgivable and non-forgivable loans paid to the Advisor's owners. The financial support was utilized to reimburse Clients for account transfer costs and for the period of time in which the owners were not compensated during the transition. The Advisor has not received further financial support and have since retired these obligations.

Participation in Institutional Advisor Platforms (Schwab)

SilverLake has also established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like SilverLake. As a registered investment advisor participating on the Schwab Advisor Services platform, SilverLake receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its 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 from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and support to SilverLake that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. SilverLake believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platforms (Fidelity)

SilverLake has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its 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 from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information. The Advisor will also receive credits from Fidelity which can be used toward qualifying third-party service providers used in connection with the initial set up of the Firm's research technology, software platforms, as well as offsetting client transfer/close out fees.

B. Client Referrals from Solicitors

SilverLake does not engage paid solicitors for Client referrals.

Item 15 – Custody

SilverLake 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 select their own Custodian to retain their funds and securities and direct SilverLake to utilize the Custodian for the Client's security transactions. SilverLake encourages Clients to review statements provided by the Custodian for accuracy. The deduction of the Advisor's investment advisory fee from the Client is considered custody of Client funds. To mitigate any conflict, the Advisor recommends LPL Financial as the qualified Custodian. LPL calculated and deducts the investment advisory fees on behalf of the Advisor and the Client pursuant to the Client's direct agreement with LPL. The Advisor does not have the authority to deduct any fees. 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

SilverLake offers its investment advisory services on either a discretionary or non-discretionary basis. For discretionary accounts, SilverLake will have the authority 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 SilverLake. 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 SilverLake will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

SilverLake 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

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

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SilverLake Wealth Management LLC

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

Effective: March 19, 2020

This Form ADV 2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices of SilverLake Wealth Management LLC ("SilverLake" or the "Advisor") when offering services where securities transaction fee are combined with investment advisory fees into single fee (a "wrap fee program"). If you have any questions about the contents of this Wrap Fee Program Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

SilverLake 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 through SilverLake to assist you in determining whether to retain the Advisor.

Additional information about SilverLake and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 165525.

Item 2 – Material Changes

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 Brochure discusses wrap fee programs offering by SilverLake.

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 SilverLake Disclosure Brochure) or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of SilverLake.

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 by searching with the Advisor's firm name or CRD# 165525. You may also request a copy of this Wrap Brochure at any time, by contacting the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

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Item 4 – Services Fees and Compensation

A. Advisory Services

SilverLake Wealth Management LLC (“SilverLake” or the “Advisor”) provides customized wealth advisory services for its Clients. The SilverLake Wrap Fee Program (the “Wrap Fee Program”) is an investment advisory program sponsored by SilverLake whereby SilverLake includes normal securities transaction fees with its investment advisory fees to provide Clients with a single overall fee.

The SilverLake Wrap Fee Program Brochure is provided solely as a disclosure when SilverLake includes securities transaction fees as part of its overall investment advisory fee (as detailed in Item 5 of the Disclosure Brochure). Clients may be offered a fee structure that includes, as a single fee, the securities transaction costs for trading in Client accounts along with the investment advisory fees earned by SilverLake. The securities regulations often refer to such a structure as a “Wrap Fee Program”. While traditional Wrap Fee Programs are often rigid, pre-packaged investment programs, SilverLake customizes its investment strategies individually for its Clients.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees with investment advisory fees. This Wrap Fee Program Brochure will reference back to the SilverLake Disclosure Brochure in which this Wrap Fee Program Brochure is an Appendix.

SilverLake offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and retirement plans (each referred to as a “Client”). Please see Item 4 of the Disclosure Brochure for details regarding SilverLake’s investment management services.

B. Program Costs

Advisory Services provided by SilverLake pursuant to a wrap fee structure may cost the Client more or less than purchasing these types of investment management services separately. When SilverLake absorbs normal securities transactions fees, SilverLake may have a financial incentive to limit the transactions in Client accounts, as each trade will increase costs to SilverLake. The costs of the Wrap Fee Program vary depending on services to be provided be to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee Program structure has a conflict of interest as the Advisor has an incentive to limit the number of trades placed in the Client’s account[s] or to utilize no transaction fee (“NTF”) funds in order to lower overall costs 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.

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 market value of assets under management at the end of the previous calendar quarter. Investment advisory fees range from 0.50% to 1.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. Investment advisory fees are negotiable and the agreed-upon fee will be included in the investment advisory agreement. The Client’s fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by SilverLake will be independently valued by the designated Custodian. SilverLake will not have the authority or responsibility to value portfolio securities.

SilverLake provides this Wrap Fee Program Brochure when SilverLake pays all typical securities transactions costs associates with SilverLake investment strategies. Clients should only read this Wrap Fee Program Brochure in connection with SilverLake’s Disclosure Brochure.

C. Fees

The SilverLake Wrap Fee Program includes typical securities trading costs incurred in connection with the discretionary investment management services provided by SilverLake. Securities transaction fees for Client-directed trades may be charged to the Client. Clients engaging SilverLake under this Wrap Fee Program will typically pay a higher overall investment advisory fee, but will not be responsible for securities transaction fees for

their accounts. Clients should discuss the expected level of trading in the Client's account[s] to determine whether to engage SilverLake under this Wrap Fee Program or pay for securities transaction fees separately. Fees may be negotiable at the sole discretion of SilverLake.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. All fees paid to SilverLake for investment advisory services are separate and distinct from the expenses charged by mutual funds and Exchange Traded Funds ("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 as a shareholder in a fund. Additionally, account activity fees, such as electronic funds and wire transfers fees, certificate delivery fees, markups and markdowns, bid-ask spreads, selling concessions, and other miscellaneous fees and expenses as outlined in the account opening paperwork executed with the Custodian, are generally charged to the Client. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third party fees not covered under this Wrap Fee Program.

D. Compensation

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

Item 5 – Account Requirements and Types of Clients

SilverLake offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans (each referred to as a "Client"). Please see Item 7 of the Disclosure Brochure for additional information.

Item 6 – Portfolio Manager Selection and Evaluation

A. Portfolio Manager Selection

SilverLake serves as both the sponsor and the portfolio manager for the SilverLake Wrap Fee Program. SilverLake does not select third-party advisors to manage the Wrap Fee Program.

B. Related Persons

SilverLake personnel serve as portfolio managers for services under this Wrap Fee Program. SilverLake only manages this Wrap Fee Program. SilverLake does not serve as a portfolio manager for any third-party wrap fee program.

C. Supervised persons

SilverLake Supervised Persons serve as portfolio managers for the SilverLake Wrap Fee Program described in this Wrap Fee Program Brochure. Please refer to the Items 4 and 8 of the Disclosure Brochure for details on the services provided by SilverLake. For information related to the background of SilverLake Supervised Persons, please see Items 9 and 11 of the Disclosure Brochure.

Performance-Based Fees

SilverLake does not charge performance-based fees for its investment advisory services. The fees charged by SilverLake are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. SilverLake 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. Please see Item 6 of the Disclosure Brochure.

Methods of Analysis

SilverLake primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. The Advisor may also employ other analysis methods. Research and analysis from SilverLake is 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. As noted above, SilverLake generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SilverLake will typically 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, SilverLake 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.

As noted above, SilverLake generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SilverLake will typically 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, SilverLake 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. Please see Item 8.A. of the Disclosure Brochure

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. SilverLake 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. Some of those risks are as follows:

Market Risk

The price of a security may decrease in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.

Fundamental Analysis - 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 in "Item 13 – Review of Accounts".

Technical Analysis - In its technical analysis, the Advisor seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. While this type of analysis helps the Advisor to determine approximate timing for purchases and sales, it does not guarantee that the investment will increase in value.

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 have 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.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6)

Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

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.

Non-Purpose Loans and Lines of Credit

Non-purpose loans and lines of credit carry a number of risks, including but not limited to the risk of a market downturn, tax implications if collateralized securities are liquidated, and an increase in interest rates. A decline in the market value of collateralized securities held in the account[s] at the Custodian, may result in a reduction in the draw amount of the Client's line of credit, a demand from the Lending Program that the Client deposit additional funds or securities in the Client's collateral account[s], or a forced sale of securities in the Client's collateral account[s].

Voting Client Securities

SilverLake does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. SilverLake 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

SilverLake is required to describe the type and frequency of the information it communicates to any external managers that may be involved in managing its Clients' investment portfolios. SilverLake serves as the sole portfolio manager under this Wrap Fee Program and, as such, the Advisor has no information to disclose in relation to regarding this Item.

Item 8 – Client Contact with Portfolio Managers

There is no restriction on the Client's ability to contact SilverLake.

Item 9 – Additional Information

A. Disciplinary Information and Other Financial Industry Activities and Affiliations

Disciplinary Information

There are no legal, regulatory or disciplinary events involving SilverLake or any of its management persons. SilverLake value 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 on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Clients may search by the Advisor's firm name or CRD #165525.

Other Financial Activities and Affiliations

Broker-Dealer Affiliation - Advisory Persons of SilverLake are also registered representatives of LPL Financial, LLC, a registered broker-dealer (CRD No. 6413), member FINRA, SIPC (herein "LPL"). In their separate capacity as registered representatives, 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 of SilverLake. Neither SilverLake nor its Advisory Persons will earn investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative where commissions are also earned.

Generally, recommendations made by SilverLake to its Clients are implemented by Advisory Persons in their role as Investment Advisor Representatives of SilverLake and not in their role as registered representatives. As such,

Clients of SilverLake only pay advisory fees as described above. In no circumstances, will SilverLake earn an advisory fee and a commission on the same investment.

Insurance Agency Affiliations - Certain Advisory Persons of SilverLake are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with the SilverLake. As insurance professionals, Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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 Advisory Persons or the Advisor.

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

Code of Ethics

SilverLake has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SilverLake ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. SilverLake and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SilverLake associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may address employee ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Personal Trading and Conflicts of Interest

SilverLake allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SilverLake 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. SilverLake does not have a material interest in any securities traded in Client accounts.

Personal Trading in Same Securities as Clients

SilverLake 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 may be recommended (purchase or sell) to Clients presents a potential conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of SilverLake 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 SilverLake 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.

Personal Trading at Same Time as Client

While SilverLake 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 SilverLake or any Supervised Person of SilverLake, transact in any security to the detriment of any Client.**

Please see Item 11 of the Disclosure Brochure for additional disclosures.

Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Principals of SilverLake, which may periodically include the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. The Client is encouraged to notify SilverLake if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may

be triggered by material market, economic or political events.

Other Compensation

As noted throughout this Disclosure Brochure, Advisory Persons of SilverLake may also be registered representatives of LPL Financial and/or licensed insurance professionals. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the Item 10 of the Disclosure Brochure.

Client Referrals from Solicitors

SilverLake does not receive any compensation from any third party in connection with providing investment advisory services to its Clients.

Financial Information

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

Form ADV Part 2B – Brochure Supplement

for

**Richard J. Briand
Managing Partner**

Effective: March 19, 2020

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Richard J. Briand (CRD# **1045809**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Mr. Briand is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

The Managing Partner of SilverLake is Richard J. Briand. Mr. Briand, born in 1955, is a dedicated Portfolio Manager for Client accounts of SilverLake. Mr. Briand earned a B.S. in Accounting from Bentley University in 1978. Additional information regarding Mr. Briand's employment history is included below.

Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial	10/2012 to Present
Managing Partner, Wells Fargo Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	10/2005 to 05/2009
Financial Advisor, Wachovia Securities, LLC	05/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securities, Inc.	08/2000 to 06/2002

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Briand. Mr. Briand 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. Briand.

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. Briand.***

However, we do encourage you to independently view the background of Mr. Briand on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD#1045809.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Briand is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Briand will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Briand. Neither the Advisor nor Mr. Briand will earn ongoing investment advisory fees in connection with any services implemented in Mr. Briand's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Briand earns a commission on an investment, the advisory fee will be waived by SilverLake.

Insurance Agency Affiliations

Mr. Briand is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Briand will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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. Briand or the Advisor.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Briand serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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 – Individual Disclosure Brochure

for

**Robert W. Eddy
Managing Partner**

Effective: March 19, 2020

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert W. Eddy (CRD# **75378**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Robert W. Eddy is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Robert W. Eddy is a Managing Partner of SilverLake. Mr. Eddy, born in 1945, is dedicated to serving the Clients of SilverLake. Mr. Eddy earned a Bachelor of Science from Ithaca College in 1967. Additional information regarding Mr. Eddy's employment history is included below.

Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial	10/2012 to Present
Managing Partner, Wells Fargo Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network Inc.	06/2003 to 05/2009
Managing Partner, Wachovia Securities Financial Network LLC	06/2002 to 05/2003
Financial Advisor, Morgan Stanley DW	02/1978 to 04/2002

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Eddy. Mr. Eddy 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. Eddy.

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. Eddy.***

However, we do encourage you to independently view the background of Mr. Eddy on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD# 75378.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Eddy is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Eddy will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Eddy. Neither the Advisor nor Mr. Eddy will earn ongoing investment advisory fees in connection with any services implemented in Mr. Eddy's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Eddy earns a commission on an investment, the advisory fee will be waived by SilverLake.

Insurance Agency Affiliations

Mr. Eddy, Managing Partner of SilverLake, is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Eddy will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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. Eddy or the Advisor.

Item 5 – Additional Compensation

Mr. Eddy has additional business activities were compensation is received. These business activities are detailed in Item 4 above.

Item 6 – Supervision

Mr. Eddy serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steel, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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 – Individual Disclosure Brochure

for

**Thomas Golonka, CFA, CFP®
Managing Partner**

Effective: March 19, 2020

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Thomas Golonka (CRD# **2209094**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Thomas Golonka is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Thomas Golonka is a Managing Partner of SilverLake. Mr. Golonka, born in 1967, is dedicated to serving the Clients of SilverLake. Mr. Golonka earned an MBA from Union College in 1991 and a Bachelor of Arts from the University of Notre Dame in 1989. Additional information regarding Mr. Golonka's employment history is included below.

Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representatives, LPL Financial, LLC	10/2012 to Present
Managing Partner, Wells Fargo Advisors Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	10/2005 to 5/2009
Financial Advisor, Wachovia Securities, LLC	06/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	08/2000 to 05/2003

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct

Certified Financial Planner™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Golonka. Mr. Golonka 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. Golonka.

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. Golonka.*** However, we do encourage you to independently view the background of Mr. Golonka on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD# 2209094.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Golonka is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Golonka will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Golonka. Neither the Advisor nor Mr. Golonka will earn ongoing investment advisory fees in connection with any services implemented in Mr. Golonka's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Golonka earns a commission on an investment, the advisory fee will be waived by SilverLake.

Insurance Agency Affiliations

Mr. Golonka is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Golonka will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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. Golonka or the Advisor.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Golonka serves as a Managing Partner of SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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 – Individual Disclosure Brochure

for

**Jeffrey D. Steele
Managing Partner and Chief Compliance Officer**

Effective: March 19, 2020

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Jeffrey D. Steele (CRD# **2111373**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Jeffrey D. Steele is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jeffrey D. Steele is a Managing Partner and the Chief Compliance Officer of SilverLake. Mr. Steele, born in 1967, is dedicated to serving the Clients of SilverLake. Mr. Steele earned a B.A. in Economics from SUNY Cortland in 1989. Additional information regarding Mr. Steele's employment history is included below.

Employment History:

Managing Partner & Chief Compliance Officer, SilverLake Wealth Management LLC	10/2012 to Present
Financial Advisor, LPL Financial, LLC	10/2012 to Present
Managing Partner, Wells Fargo Advisors Financial Network LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network LLC	10/2005 to 05/2009
Financial Advisor, Wachovia Securities, LLC	06/2003 to 10/2005
Financial Advisor, Wachovia Securities, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securities, Inc.	04/2002 to 06/2002
Financial Advisor, Dean Witter Reynolds, Inc.	10/1990 to 04/2002

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Steele. Mr. Steele 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. Steele.

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. Steele.***

However, we do encourage you to independently view the background of Mr. Steele on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD# 2111373.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Steele is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Steele will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Steele. Neither the Advisor nor Mr. Steele will earn ongoing investment advisory fees in connection with any services implemented in Mr. Steele's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Steele earns a commission on an investment, the advisory fee will be waived by SilverLake.

Insurance Agency Affiliations

Mr. Steele is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Steele will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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. Steele or the Advisor.

Item 5 – Additional Compensation

Mr. Steele has additional business activities were compensation is received. These business activities are detailed in Item 4 above.

Item 6 – Supervision

Mr. Steele serves as the Managing Partner and the Chief Compliance Officer and Chief Compliance Officer of SilverLake. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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 – Individual Disclosure Brochure

for

**Theodore M. Riehle
Managing Partner**

Effective: March 19, 2020

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Theodore M. Riehle (CRD# **1053690**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or SilverLake’s Disclosure Brochure, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Theodore M. Riehle is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Theodore M. Riehle is a Managing Partner of SilverLake. Mr. Riehle, born in 1947, is dedicated to serving the Clients of SilverLake. Mr. Riehle earned a Bachelor of Science from the University of Vermont in 1970. Additional information regarding Mr. Riehle's employment history is included below.

Employment History:

Managing Partner, SilverLake Wealth Management LLC	10/2012 to Present
Registered Representative, LPL Financial, LLC	10/2012 to 11/2019
Managing Partner, Wells Fargo Advisors Financial Network, LLC	05/2009 to 10/2012
Managing Partner, Wachovia Securities Financial Network, LLC	06/2003 to 05/2009
Managing Partner, Wachovia Securities Financial Network, Inc.	06/2002 to 05/2003
Financial Advisor, First Union Securities Financial Network, Inc.	03/2002 to 06/2002
Financial Advisor, Morgan Stanley	01/1995 to 03/2002

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Riehle. Mr. Riehle 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. Riehle.

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. Riehle.***

However, we do encourage you to independently view the background of Mr. Riehle on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD# 1053690.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Riehle is also a licensed insurance professional. This activity is done separate and apart from his role with SilverLake. As an insurance agent, Mr. Riehle will receive customary commissions and other related revenues from the various insurance companies whose products are sold. 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. Riehle or the Advisor.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Riehle serves as the Managing Partner and Chief Compliance Officer and Chief Compliance Officer of SilverLake. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight

by various agencies. These agencies require registration by SilverLake and its Supervised Persons. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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

**Derek G. Eddy
Investment Advisor Representative**

Effective: March 20, 2018

This Form ADV Part 2B (“Brochure Supplement”) provides information about the background and qualifications of Derek G. Eddy (CRD# **5648908**) in addition to the information contained in the SilverLake Wealth Management LLC (“SilverLake”) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the SilverLake Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (802) 857-5083 or by email at info@silverlakewealth.com.

Additional information about Mr. Eddy is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Derek G. Eddy is an Investment Advisor Representative with SilverLake. Mr. Eddy, born in 1984, is dedicated to advising Clients of SilverLake. Mr. Eddy earned a Bachelors in Business and Economics from Bishop University in 2008. Additional information regarding Mr. Eddy's employment history is included below.

Employment History:

Investment Advisor Representative, SilverLake Wealth Management LLC	03/2009 to Present
Registered Representative, LPL Financial LLC	12/2012 to Present
Registered Representative, Wells Fargo Advisor Financial Network LLC	05/2009 to 12/2012
Sales Assistant, Wachovia Securities Financial Network, LLC	05/2008 to 05/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Eddy. Mr. Eddy 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. Eddy.

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. Eddy.*** However, we do encourage you to independently view the background of Mr. Eddy on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by his full name or by his CRD# 5648908.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Eddy is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Eddy will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Eddy. Neither the Advisor nor Mr. Eddy will earn ongoing investment advisory fees in connection with any services implemented in Mr. Eddy's separate capacity as a registered representative. In no circumstances will SilverLake earn an advisory fee and a commission on the same investment. In the event that Mr. Eddy earns a commission on an investment, the advisory fee will be waived by SilverLake.

Item 5 – Additional Compensation

Mr. Eddy has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Eddy serves as an Investment Advisor Representative with SilverLake and is supervised by Jeffrey Steele, the Chief Compliance Officer. Mr. Steele can be reached at (802) 857-5083.

SilverLake has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of SilverLake. Further, SilverLake is subject to regulatory oversight by various agencies. These agencies require registration by SilverLake and its employees. As a registered entity, SilverLake is subject to examinations by regulators, which may be announced or unannounced. SilverLake 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

Effective: March 19, 2020

Our Commitment to You

SilverLake Wealth Management LLC ("SilverLake" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. SilverLake (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have 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. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

SilverLake does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper 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 Privacy Policy.

Why you need to know?

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

What information do we collect from you?

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 sources do we collect information from in addition to you?

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 we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
<p>Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc. <p>We are required to share your information with LPL Financial, LLC due to the affiliation of our advisory persons as registered representatives of LPL.</p>	SilverLake may share this information.	Clients cannot limit the Advisor's ability to share.
<p>Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p>	SilverLake may share this information.	Clients cannot limit the Advisor's ability to share.
<p>Marketing Purposes SilverLake 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 SilverLake or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	SilverLake does not share personal information.	Clients cannot limit the Advisor's ability to share.
<p>Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent[s] or representative[s].</p>	SilverLake does share personal information.	Clients can limit the Advisor's ability to share.
<p>Information About Former Clients SilverLake 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.</p>	SilverLake does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about SilverLake's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy 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.

State specific regulations

Vermont

In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties we will only disclose your name, address, other contract information, and general information about our experience with you.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (802) 857-5083 or by email at info@silverlakewealth.com.