

# **Form ADV, Part 2A, Appendix 1**

Item 1 - Cover Page

## **WRAP FEE PROGRAM BROCHURE – STRATEGIC ASSET MANAGEMENT PROGRAM**

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This wrap fee program Brochure provides information about the qualifications and business practices of Relevant Wealth Advisors, LLC ("Relevant Wealth Advisors"). If you have any questions about the contents of this Brochure, please contact Bruce Raabe, Managing Member and Chief Compliance Officer, at (415) 925-4000. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

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

Relevant Wealth Advisors is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

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**Item 2 – Material Changes**

This document shall serve as an update to our previous brochure dated April 8, 2021. The following sections have been updated with this amendment:

- Various sections were updated to reflect our new custodial relationship with Charles Schwab & Co., Inc.

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**Item 4 - Services, Fees and Compensation**

Relevant Wealth Advisors is a full-service investment adviser and brokerage firm offering comprehensive asset management services. Relevant Wealth Advisors is the sponsor and portfolio manager of the Strategic Asset Management Program, a wrap fee program that provides client with continuous investment advice based on their individual needs. This includes evaluating assets and obligations to determine the appropriate investment allocation necessary to realize the client's objectives. This can be done on either a discretionary or non-discretionary basis. Some of Relevant Wealth Advisors' advisory client(s) have accounts outside of the Strategic Asset Management Program. For disclosure relating to those accounts, please reference the Relevant Wealth Advisors' ADV Part 2A.

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In addition to the advisory services, the wrap fee program includes certain brokerage services of Charles Schwab & Co., Inc. (“Schwab”) a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. Relevant Wealth Advisors is independently owned and operated and not affiliated with Schwab. Schwab will act solely as a broker-dealer and not as an investment advisor to you. Schwab will have no discretion over your account and will act solely on instructions it receives from Relevant Wealth Advisors. Schwab has no responsibility for our services and undertakes no duty to you to monitor our management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when we instruct them to. Relevant Wealth Advisors does not open the account for you.

Clients invested in the Strategic Asset Management Program are charged a single, all-inclusive fee for portfolio management, brokerage, custodial, recordkeeping and other services associated with managing the account. Relevant Wealth Advisors, a registered broker and member of FINRA, also provides brokerage services to the Strategic Asset Management Program. In addition to compensating Relevant Wealth Advisors for advisory services, the wrap fee you pay Relevant Wealth Advisors allows us to pay for brokerage services provided by Schwab. Relevant Wealth Advisors generally charges a flat percentage rate that ranges from 0.5% to 1.5% which is specified in each client’s Investment Management Agreement. Fees may be negotiable. Advisory fees are payable in arrears in quarterly installments at the end of each calendar quarter based on the average daily balance of the entire account. Accounts opened between billing periods will be billed on a prorated amount based on the number of days the account was opened during that quarter. If the agreement is terminated prior to the last day of a calendar quarter, the fees will be adjusted according to the number of days the account was open on a pro rata basis. All prepaid but unearned advisory fees are refunded to the Client upon termination of an account. Account closing fees may apply.

Relevant Wealth Advisors pays Schwab a single asset-based fee in lieu of transaction-based commissions. The fees we pay Schwab are assessed on certain assets in your account(s) at Schwab, including stocks, bonds, and certain mutual funds. If there is limited or no trading activity in your account, we will receive more compensation from your participation in our wrap fee program than if you purchased our advisory services and Schwab’s services separately. The primary factor affecting the comprehensive fee is the provision by Relevant Wealth Advisors of individualized investment advice and portfolio management services tailored to needs of each individual. Brokerage, custodial and recordkeeping fees also impact the amount of the comprehensive fee, but to a lesser extent. Advisory clients who open accounts outside of the wrap program pay separate fees for these services (advisory, brokerage, custodial and recordkeeping).

When managing a client's account on a wrap fee basis, we receive as compensation for our investment advisory services, the balance of the total wrap fee you pay after custodial, trading and other management costs (including execution and transaction fees) have been deducted. Accordingly, we have a conflict of interest because we have a financial incentive to maximize our

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compensation by seeking to reduce or minimize the total costs incurred in your account(s) subject to a wrap fee. Schwab has eliminated transaction fees for online trades of U.S. equities, ETFs and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab. We encourage you to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab's most recent pricing schedules available at <https://www.schwab.com/legal/schwab-pricing-guide-for-advisor-services>.

The fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), fees for trades executed away from the custodian, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. A small annual fee may also be charged by the account custodian of Individual Retirement Accounts and qualified plan accounts. This fee will be disclosed upon opening of the account. Additionally, postage may be charged for the mailing of confirmations.

Relevant Wealth Advisors, as the sponsor and portfolio manager of the Strategic Asset Management Program generally does not use outside portfolio managers and brokers. Relevant Wealth Advisors generally does not pay or receive any referral fees for client referrals. Relevant Wealth Advisors generally does not receive any sales commissions, 12b-1 fees or other fees from mutual funds and ETFs for investing such funds on behalf of advisory clients.

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

The minimum account size to participate in the Strategic Asset Management Program is \$10,000,000. A traditional commission-based brokerage account may be more appropriate for smaller accounts. Under certain circumstances, the \$10,000,000 minimum amount may be waived. Clients invested in the Strategic Asset Management Program include individuals, high net-worth individuals, trusts & estates, businesses, pension plans and charitable organizations.

The benefits under a wrap fee program depend, in part, upon the size of the account, the costs associated with managing the account, and the frequency or type of securities transactions executed in the account. For example, a wrap fee program may not be suitable for all accounts, including but not limited to accounts holding primarily, and for any substantial period of time, cash or cash equivalent investments, fixed income securities or no-transaction-fee mutual funds, or any other type of security that can be traded without commissions or other transaction fees. In order to evaluate whether a wrap fee arrangement is appropriate for you, you should compare the agreed-upon wrap program fee and any other costs associated with participating in our wrap fee program with the amounts that would be charged by other advisers, broker-dealers, and custodians, for advisory fees, brokerage and execution costs, and custodial services comparable to those provided under the wrap fee program.

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**Item 6 - Portfolio Manager Selection and Evaluation****A. Portfolio Manager Selection and Evaluation**

Relevant Wealth Advisors is the portfolio manager of the Strategic Asset Management Program. Portfolio management services are provided to clients of the Strategic Asset Management Program by Bruce Raabe, President, Chief Executive Officer, Managing Member and Chief Investment Officer, and Justin Burt, Senior Portfolio Manager. Both Mr. Raabe and Mr. Burt are experienced portfolio managers, hold the Chartered Financial Analyst designation, are registered as General Securities Representatives, and hold undergraduate and/or advanced college degrees. Detailed information regarding Mr. Raabe's and Mr. Burt's experience, education, professional designations and other qualifications are provided in Form ADV, Part 2B.

Clients generally receive quarterly reports from Relevant Wealth Advisors, including performance results. These performance results are generated by Relevant Wealth Advisors using a third-party data aggregator who receives account feeds from the account custodian(s) directly. Performance calculations are in accordance with the Global Investment Performance Standards (GIPS), which are issued by the CFA Institute. Clients receive monthly or quarterly statements showing all account activity from an independent custodian. Performance calculations are reviewed by Mr. Raabe and Mr. Burt to ensure their accuracy.

Relevant Wealth Advisors recognizes that potential conflicts of interest may arise because its employees, Mr. Raabe and Mr. Burt, are the portfolio managers of the Strategic Asset Management Program. However, Relevant Wealth Advisors has addressed these issues by requiring that its ongoing evaluations of the portfolio managers' performance be based on objective criteria (e.g. standardized performance results and adherence to client determined guidelines). Relevant Wealth Advisors has also adopted a Code of Ethics, described in Item 9.C. below and Form ADV, Part 2A, requiring its employees to always act in the best interest of the firm's clients in accordance with the firm's high fiduciary standards. The Code of Ethics also prohibits all employees of Relevant Wealth Advisors from abusing confidential client information for their personal gain.

**B. Description of Wrap Fee Program Services**

Relevant Wealth Advisors provides investment advisory services to its wrap fee program clients and other advisory clients based on the individual needs of each client. Advisory services include consulting with each client about their financial needs and objectives; providing advice regarding investment strategy and asset allocation; selecting, purchasing, and selling securities for clients; monitoring securities; and providing appropriate reports as to asset holdings and valuation. Generally, Relevant Wealth Advisors develops a personalized investment policy for each client and creates and manages a portfolio based on that policy. Relevant Wealth Advisors also provides certain clients with wealth management services, which may include advice on personal assets, professional relationships, charitable giving, retirement plans, taxes, business succession, liability management, family giving and investment policy development.

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Clients may impose restrictions on their investments upon request. These restrictions may include prohibitions or limits on individual securities, security types, asset classes, allocation, liquidity, credit quality, and income. Relevant Wealth Advisors, as a registered broker-dealer and member of the NYSE and FINRA, provides trade execution services to clients invested in the Strategic Asset Management Program. Brokerage clearing services are provided by Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC.

The primary difference between wrap fee program clients and other advisory clients is that wrap fee clients pay a single, all-inclusive fee for portfolio management, trade execution, and custodial services. Clients who are not invested in the wrap fee program pay for these services separately. Clients invested in the wrap-fee program do not have the discretion to select their own broker.

C. Performance Based Fees and Side-by-Side Management

Relevant Wealth Advisors does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Relevant Wealth Advisors does not believe any material conflicts of interest exist between management of clients invested in the Strategic Asset Management Program and other advisory clients because each client portfolio is individually tailored to the unique needs and objectives of each client.

D. Methods of Analysis, Investment Strategies and Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

Relevant Wealth Advisors' research focuses on fundamental analysis. This disciplined approach evaluates companies individually based on past and expected financial performance relative to the price of related security. Additionally, Relevant Wealth Advisors' portfolio managers may use technical, charting, and cyclical analysis to time the sale or purchase of investments. The main sources of information used for this analysis include annual reports, financial news services, research materials prepared by others and corporate rating services.

The primary investment strategy used to implement investment advice given to a client is to make long-term purchases (securities held for at least one year). However, based on the client's specific desires, short-term and margin transactions may also be a part of the investment strategy. Relevant Wealth Advisors offers advice on the following types of securities: (1) equities (exchange listed, over-the-counter and foreign issues); (2) warrants; (3) corporate debt securities; (4) municipal securities; (5) United States government securities; (6) options contracts on securities; (7) mutual funds and Exchange Traded Funds ("ETFs"), and (8) alternative investments.

E. Voting Client Securities (i.e., Proxy Voting)

Relevant Wealth Advisors may or may not have authority for voting client securities (proxy voting), depending on the terms of the applicable client's Investment Management Agreement. For those client accounts where Relevant Wealth Advisors has accepted proxy voting authority, Relevant Wealth Advisors will be responsible for the voting of all proxies related to securities held in those client accounts. Relevant Wealth Advisors uses a third-party proxy voting service, Institutional

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Shareholder Services (ISS), to vote client proxies in accordance with its standard proxy voting guidelines.

Conflicts may arise when any employees have any financial, business or personal relationship with the issuer of a proxy proposal for a security held in a client's account. To avoid potential conflicts of interest, Relevant Wealth Advisors votes proxies in accordance with predetermined guidelines. In limited situations, we may consider voting under our own initiative for a particular issue, if we believe that it is in the best interest of the client. Before Relevant Wealth Advisors reclaims proxy voting authority from ISS, Relevant Wealth Advisors will determine and confirm that no potential conflict of interest exists.

Relevant Wealth Advisors maintains records in accordance with Rule 204 under the Advisers Act relating to proxy voting for securities in client accounts. Such records include:

- A copy of related policies and procedures;
- Proxy statements received regarding client securities, which were satisfied by relying on the third-party vendor contracted to provide voting services;
- A record of each vote cast, which the third-party vendor maintains on our behalf; and
- Each written client request for proxy voting records and any written response.

A client may obtain the following information by submitting a verbal request by calling the firm or a written request to the firm's mailing address:

- A copy of the Standard ISS Proxy Voting Manuals, which detail the policies and procedures for casting proxy votes; and
- Information about how the client's proxies were voted.

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

All client information is provided to the portfolio managers of the Strategic Asset Management program. This information includes background information, investment objectives and guidelines, risk tolerance, restrictions on investments, and other information detailing each client's personal financial and investment needs and objectives.

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

There are no restrictions on clients' ability to contact portfolio managers.

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**Item 9 – Additional Information****A. Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Relevant Wealth Advisors or the integrity of Relevant Wealth Advisors' management. Relevant Wealth Advisors has no information applicable to this Item.

**B. Other Financial Industry Activities and Affiliations**

Relevant Wealth Advisors is a registered broker-dealer under the Securities Exchange Act of 1934 and is a member of FINRA. Bruce Raabe, President, Chief Executive Officer, and Managing Member, is registered as representative of Relevant Wealth Advisors as a broker-dealer agent, Investment Advisor Representative. Mr. Raabe may receive commissions in accordance with industry standards as compensation for providing brokerage services to advisory clients.

It is anticipated that Mr. Raabe will spend approximately 80% of his time on investment advisory activities and 20% of his time on broker-dealer activities. These estimates are expected to change from time to time.

Relevant Wealth Advisors' or Mr. Raabe's receipt of fees, commissions or other compensation for providing brokerage services may result in potential conflicts of interest with the fiduciary duty to act in the best interests of advisory clients. Relevant Wealth Advisors has addressed these potential conflicts of interest by recognizing its fiduciary duty to act in the best interest of its advisory clients at all times, by providing advisory clients with written disclosure of potential conflicts of interest, and by adopting and implementing compliance policies and procedures and a Code of Ethics designed to ensure that Relevant Wealth Advisors acts in the best interests of its clients at all times.

**C. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Relevant Wealth Advisors has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions that require employees to act in the best interests of clients at all times, prohibit employees and others from using confidential client information for their personal benefit, and require employees to submit at least quarterly reports of their personal securities transactions and holdings.

Relevant Wealth Advisors does not participate or have an interest in transactions of clients who participate in the wrap fee program. However, employees of Relevant Wealth Advisors may personally invest in securities owned by clients invested in the Strategic Asset Management Program. Employees' personal securities transactions are subject to Relevant Wealth Advisors' Code of Ethics, and such transactions are monitored by Relevant Wealth Advisors to ensure that employees' personal investment do not conflict with Relevant Wealth Advisors' fiduciary duty to always act in its clients' best interests. Relevant Wealth Advisors does not act in the capacity of a

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principal in executing advisory clients' securities transactions. Relevant Wealth Advisors also does not engage in cross-trades among advisory clients (e.g. causing one advisory client to buy or sell a security to or from another advisory client). Relevant Wealth Advisors' present policy is not to execute agency-cross transactions (e.g. Relevant Wealth Advisors acting as an investment advisor on behalf of one client to buy or sell a security while acting as the broker for the other party to the same transaction.).

#### D. Review of Accounts

Client accounts are continually monitored. These reviews include a Portfolio Summary, a Performance Summary, and any other additional information necessary to accurately review the account. Reviews are conducted by the portfolio managers Mr. Raabe and Mr. Burt.

#### E. Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described in Item 12—Brokerage Practices of our ADV Part 2A brochure.

Relevant Wealth Advisors generally does not pay or receive client referral fees.

#### F. Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures regarding any financial conditions that may impair their ability to meet contractual commitments to clients. Relevant Wealth Advisors has no financial conditions that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.