



**Part 2A of Form ADV: Firm Brochure**

Form ADV, Part 2A, Item 1

***Cover Page***

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**MEADOWBROOK WEALTH MANAGEMENT, LLC**

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**March 4, 2021**

**FORM ADV PART 2  
FIRM BROCHURE**

**This brochure provides information about the qualifications and business practices of Meadowbrook Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (888) 888-5250. 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 Meadowbrook Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Meadowbrook Wealth Management, LLC is 801-110418/110508.**

**Meadowbrook Wealth Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

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***Material Changes***

This section discusses only material changes since our last update on January 23, 2020. The following material changes were made to the Brochure to accurately reflect our advisory business:

- None

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***Advisory Business***

Meadowbrook Wealth Management, LLC (hereinafter referred to as "MWM" or "Registrant") is a Registered Investment Adviser based in Garden City, New York. Founded in 1999 and formerly named GMG Asset Management, Inc., Meadowbrook Wealth Management, LLC provides investment advice and portfolio management services on a continuing basis, which may include the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Advisory services are tailored to the needs of clients on a case by case basis, and categorically fit into one of four basic categories; aggressive growth, growth, balanced and fixed income. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification.

Meadowbrook Wealth Management, LLC provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with Meadowbrook Wealth Management, LLC. Managed Accounts are available to individuals, small businesses and trusts.

Meadowbrook Wealth Management, LLC is owned by Thomas Efthimiou and Richard Jack. Meadowbrook Wealth Management, LLC is registered with the Securities and Exchange Commission and is subject to its rules and regulations.

Meadowbrook Wealth Management, LLC has a brokerage and custodial arrangements with Shareholder Services Group ("SSG"). Prospective clients are hereby advised that lower fees for comparable services may be available from other sources.

Meadowbrook Wealth Management, LLC provides discretionary and non-discretionary investment advisory services to some of its clients through various managed account programs. Meadowbrook Wealth Management, LLC will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. The Registrant and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account

- Performing client suitability check on account documentation, reviewing the investment objectives and evaluating the investment vehicle selections
- Providing Firm Brochure (this document)

The firm has the following assets under management as of January 19, 2021:

Discretionary Assets under Management: \$59,715,000

Non-Discretionary Assets Under Management: \$52,000

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### ***Fees and Compensation***

The following types of fees will be assessed:

**Asset Management** – Fees are charged in advance and are based primarily on asset size and the level of complexity of the services provided. In individual cases, MWM has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial quarter will be prorated based upon the number of calendar days remaining in the calendar quarter that the advisory agreement is in effect. Fees are charged in advance based on the market value of the assets on the last business day of the previous quarter. Annual fees range from .5% - 2.50% depending on the amount of assets under management (“AUM”) and the type of portfolio – See chart below. Consulting services may be included in these fees for asset management services.

Fee Schedules for Asset Management:

#### **Aggressive Growth Portfolio**

Total Account Value	Maximum Annual Advisory Fee
\$50,000 - \$249,999	2.50%
\$250,000 - \$749,999	2.00%
\$750,000 or more	1.75%

Note: A minimum of \$50,000 of assets is required for management of an Aggressive Growth Portfolio.

#### **Growth Portfolio**

Total Account Value	Maximum Annual Advisory Fee
\$100,000 - \$249,999	2.00%
\$250,000 - \$749,999	1.50%
\$750,000 or more	1.25%

Note: A minimum of \$100,000 of assets is required for management of a Growth Portfolio.

### **Balanced Portfolio**

Total Account Value	Maximum Annual Advisory Fee
\$100,000 - \$249,999	1.50%
\$250,000 or more	1.00%

Note: A minimum of \$100,000 of assets is required for management of a Balanced Portfolio.

### **Fixed Income Portfolio**

Total Account Value	Maximum Annual Advisory Fee
\$100,000 or more	0.50%

Note: A minimum of \$100,000 of assets is required for management of a Fixed Income Portfolio.

Clients may choose to have fees automatically deducted from their accounts, or be billed directly and remit payment to MWM. Client elects their option on how advisory fees are to be paid by initialing the appropriate box within the Investment Advisory Agreement. If a client so chooses, the account custodian withdraws MWM's advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodian in turn remits these fees to MWM. The custodial statement includes the amount of any fees paid directly to MWM to manage the account. MWM also sends quarterly invoices detailing the manner and amount of advisory fees to all clients. You should compare the statement we send to your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations. If the account does not contain sufficient funds to pay advisory fees, MWM has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. With the exception of IRA accounts, clients may reimburse the account for advisory fees paid to MWM.

MWM may charge an hourly consultation fee of \$350.00 in lieu of charging fees on assets under management which may not be applicable or feasible pertaining to a particular set of circumstances. The fee may be negotiable at the sole discretion of MWM and should be discussed prior to engaging MWM for consultation services.

Fees are charged in advance on a quarterly basis, meaning that advisory fees for a quarter are charged on the first day of the quarter. Clients may terminate investment advisory services obtained from MWM, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with MWM. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon 15 days' written notice delivered to and received by MWM. Clients who terminate investment advisory services during a quarter and provide written notice are refunded a prorated advisory fee based on the date of MWM's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable.

## **Additional Fees and Expenses**

In addition to advisory fees paid to MWM as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by broker and/or custodian. Clients should ask MWM for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. MWM does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with MWM and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of MWM or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive MWM's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Please refer to Item 12 "Brokerage Practices" of this brochure for additional information.

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## ***Performance-Based Fees and Side-By-Side Management***

MWM does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

### ***Types of Clients***

MWM offers investment advisory services to individuals, small businesses and trusts. The minimum account size for accounts with the objective of “aggressive growth” is \$50,000, while the minimum account size for accounts with the objective of either “growth”, “balanced” or “fixed Income” is \$100,000. At our discretion, we may waive the minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

### ***Methods of Analysis, Investment Strategies, and Risk of Loss***

MWM’s methods of analysis and investment strategies incorporate the client’s needs and investment objectives, time horizon, and risk tolerance. MWM is not bound to a specific investment strategy for the management of investment portfolios, but considers the risk tolerance levels determined at the account opening, as well as monitoring risk tolerance on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

**Asset Allocation** – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

**Dollar-Cost Averaging** – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

**Technical Analysis** – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

**Long-Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

**Short-Term Purchases** – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities’ short term price fluctuations.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.



Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

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### ***Disciplinary Information***

MWM or its Principal Executive Officers have not had any reportable disclosable events in the past ten years.

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### ***Other Financial Industry Activities and Affiliations***

Thomas Efthimiou oversees the operations of GM Systems, Inc. d/b/a GMG Systems, "GMG Systems." GMG Systems is a marine equipment manufacturer's representative and general reseller of ship parts and equipment. GMG Systems is wholly owned by Thomas Efthimiou. Thomas Efthimiou also oversees the operations of Camark Realty Corporation ("Camark"). Camark is a corporation which had been set up by Mr. Efthimiou's grandfather for the sole purpose of holding family real estate for investment purposes. The sole property held by Camark is an office/retail building on Franklin Avenue in Garden City, New York. Thomas Efthimiou will spend more than 75% of his time on the advisory activities of Meadowbrook Wealth Management, LLC and the remainder of his time on the activities of GMG Systems and Camark Realty.

Some employees of Meadowbrook Wealth Management are also licensed insurance agents. From time to time, they may offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. MWM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of MWM in their capacity as an insurance agent. Not more than 30% of their time is spent on these activities.

MWM does not recommend or select other investment advisors for our clients for which we receive compensation, directly or indirectly, from those advisors, nor do we have business relationships with any other investment advisors.

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

MWM's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of MWM's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with MWM are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

MWM and its employees may buy or sell securities that are also held by clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

The advisor may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of MWM shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor may block personal trades with those of clients but will ensure that clients are not at a disadvantage.

MWM's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting us at (888) 888-5250.

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### ***Brokerage Practices***

MWM recommends the services of Pershing, member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. Pershing maintains custody of all funds and securities. We believe that Pershing provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Pershing, including the value of research provided, the firm's reputation, execution capabilities, commission rates, reporting capabilities, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services Pershing provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

In order for MWM to provide you with advisory services, we will recommend that you establish an account with Pershing, for which we have an existing relationship. Our relationship with Pershing may include benefits provided to our firm, including research, market information, and administrative services that help our firm manage your account(s).

MWM does not have any soft dollar arrangements.

MWM does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

When MWM buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single “block” in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions, and no client is favored over any other client.

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### ***Review of Accounts***

Accounts are managed on a continuous basis and are reviewed at least quarterly by the Principal Executive Officers of the firm, Thomas Efthimiou and Richard Jack. Trades are reviewed on a daily basis. Confirmations of all buys and sells are sent to the client by the custodian, unless the client opts to suppress confirmations, if available to do so. Statements are provided to the client from the custodian at least quarterly if there is no activity, and monthly if there is activity. In addition, clients may receive a quarterly performance report. IARs may meet with clients as frequently as is agreed or as requested by the client or IAR.

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### ***Client Referrals and Other Compensation***

MWM does not compensate anyone for the referral of clients, nor does anyone compensate MWM for providing referrals to clients for other professional services.

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### ***Custody***

Any investment advisor having custody or access to customer funds or securities must comply with certain rules and regulations designed to protect the clients’ assets. Rule 206(4)-2 of the Investment Advisers Act of 1940 details strict requirements governing investment advisors that have “custody” over client securities or funds. MWM meets the definition of having custody due to the following circumstances:

- MWM directly debits fees from client accounts

MWM does not have physical custody of any client funds and/or securities. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian. MWM also sends quarterly invoices detailing the manner and amount of advisory fees to all clients.

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### ***Investment Discretion***

Before Meadowbrook Wealth Management, LLC can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

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### ***Voting Client Securities***

MWM will accept authority to vote client securities at client’s request. MWM will review proxies and vote them in the manner that we feel serves the best interest of the client. Client may direct MWM to vote securities in a certain manner by providing written instructions to MWM of their request. If MWM feels that there is a conflict of interest between us and the client in the voting of client securities, we will the contact client and solicit instructions from the client on how they would like for us to vote securities on the issue in question. Clients may obtain a copy of MWM’s complete proxy voting policies and procedures upon request. Clients may also obtain information from MWM about how MWM voted any proxies on behalf of their account(s).

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### ***Financial Information***

Meadowbrook Wealth Management, LLC is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$1,200 six or more months in advance.

***Requirements for State-Registered Advisers***

This section is not applicable, as the firm is registered with the Securities and Exchange Commission.