

## Item 1 – Cover Page

# BCR Wealth Strategies

1952 Urban Center Parkway Vestavia, AL 35242-2594

(205) 298-1234

[www.bcrwealth.com](http://www.bcrwealth.com)

September 1, 2021

This Brochure provides information about the qualifications and business practices of BCR® Wealth Strategies. If you have any questions about the contents of this Brochure, please contact us at (205) 298-1234 or at [kclayton@bcrwealth.com](mailto:kclayton@bcrwealth.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

BCR Wealth Strategies 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.

Additional information about BCR Wealth Strategies also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for BCR Wealth Strategies is 119670.

## **Item 2 – Material Changes**

This Item of the Brochure will discuss only specific material changes that were made to this Brochure since the last annual update. We had no material changes since the last annual update of our Brochure was January 1, 2021.

Currently, our Brochure may be requested by contacting Kristie Clayton, Chief Compliance Officer at (205) 298- 1234 or [kclayton@bcrwealth.com](mailto:kclayton@bcrwealth.com). Additional information about BCR Wealth Strategies including the firm’s Brochure is also available via the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 3 -Table of Contents

Item 1 – Cover Page .....	i
Item 2 – Material Changes .....	ii
Item 3 -Table of Contents .....	iii
Item 4 – Advisory Business.....	1
Item 5 – Fees and Compensation.....	2
Item 6 – Performance-Based Fees and Side-By-Side Management.....	4
Item 7 – Types of Clients.....	4
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	5
Item 9 – Disciplinary Information .....	7
Item 10 – Other Financial Industry Activities and Affiliations.....	7
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	7
Item 12 – Brokerage Practices.....	8
Item 13 – Review of Accounts.....	9
Item 14 – Client Referrals and Other Compensation .....	9
Item 15 – Custody .....	11
Item 16 – Investment Discretion .....	12
Item 17 – Voting Client Securities .....	12
Item 18 – Financial Information .....	12
Sandra Mitchell Cleveland .....	14
Marshall Peter Rathmell.....	17
Harold Sasnowitz .....	20

## **Item 4 – Advisory Business**

Sandra Cleveland, Marshall Rathmell, and Kristie Clayton own BCR Wealth Strategies which has been providing advisory services since 2002. As of December 31, 2020, BCR Wealth Strategies managed \$295,223,233 on a discretionary basis.

BCR Wealth Strategies offers financial planning and wealth management, consulting and investment management services to individuals, pension and profit sharing plans, trust estates, charitable organizations, corporations and business entities. BCR Wealth Strategies, depending upon the engagement, offers its services on a fee basis which may include hourly and/or fixed fees as well as fees based upon assets under management.

Prior to engaging BCR Wealth Strategies to provide any of the foregoing investment advisory services, the client will be required to enter into one or more written agreements with BCR Wealth Strategies setting forth the terms and conditions under which BCR Wealth Strategies shall render its services.

### **Financial Planning and Consulting**

BCR Wealth Strategies offers a broad range of financial planning and consulting services (which may include tax-related services, litigation support and expert witness services as well as other non-investment related matters). A financial plan consists of the following topics as applicable: clarifying and prioritizing goals, cash management, retirement planning, education planning, risk management, income tax planning, estate tax planning and investment planning.

BCR Wealth Strategies may recommend the services of itself and/or other professionals to implement financial planning and consulting recommendations. Clients are advised that a conflict of interest exists if BCR Wealth Strategies recommends its own services. A client is under no obligation to act upon any of the recommendations made by BCR Wealth Strategies under a financial planning/consulting engagement and/or engage the services of any such recommended professional, including BCR Wealth Strategies. The client retains absolute discretion over the implementation of all such financial planning/consulting decisions and is free to accept or reject any of BCR Wealth Strategies' recommendations.

### **Investment Management Services**

Based on a client's individual circumstances, BCR Wealth Strategies will manage a client portfolio(s) of investment assets. Clients may grant BCR Wealth Strategies discretionary authority to manage client portfolios by arranging for the purchase and sale of client investments through the client's investment account(s), or BCR Wealth Strategies may provide nondiscretionary services requiring the consent of the client prior to BCR Wealth Strategies arranging for the purchase or sale of any investment.

BCR Wealth Strategies will primarily allocate clients' investment management assets among mutual funds and exchange traded funds. BCR Wealth Strategies may also exercise

discretionary authority provided by the client to select a third party, unaffiliated investment manager to the extent it determines necessary for specific investment management services, primarily involving the management of large fixed income securities portfolios.

BCR Wealth Strategies also may render non-discretionary advice to clients relative to: (1) variable life/annuity products that they may own, and/or (2) their individual employer-sponsored retirement plans. In so doing, BCR Wealth Strategies either directs or recommends the allocation of client assets among the various mutual funds available within the variable life/annuity product or retirement plan. The client assets shall be maintained at either the specific insurance company that issued the variable life/annuity product which is owned by the client, or at the custodian designated by the sponsor of the client's retirement plan.

### **Retirement Plan Consulting**

BCR Wealth Strategies provides consulting services in connection with a "participant directed" retirement plan established pursuant to Section 404(c) of Employee Retirement Income Security Act ("ERISA"). BCR Wealth Strategies provides services on either a discretionary or non-discretionary basis based on the consulting agreement.

#### Information for all clients:

Each client is advised that it remains such person's responsibility to promptly notify BCR Wealth Strategies if there is ever any change in such person's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising BCR Wealth Strategies' previous recommendations and/or services.

## **Item 5 – Fees and Compensation**

### **Financial Planning and Consulting**

BCR Wealth Strategies will charge a fixed fee and/or hourly fee for these services. BCR Wealth Strategies' financial planning and consulting fees are negotiable, but generally range from a fixed fee of \$1,500 to \$10,000, or up to \$500 on an hourly rate basis, depending upon the level and scope of the services and the BCR Wealth Strategies professional rendering the financial planning and/or the consulting services. Certain clients that require more complex financial planning and consulting may be subject to additional fees.

For financial planning and/or consulting services, BCR Wealth Strategies requires one-half of the financial planning/consulting fee (estimated hourly or fixed) payable upon entering the written agreement. The balance is generally due upon delivery of the financial plan or completion of the agreed upon services. Either party may terminate the agreement by written notice to the other. In the event the client terminates BCR Wealth Strategies' financial planning and/or consulting services, any additional balance may be negotiated between BCR Wealth Strategies and the client.

## **Investment Management Services**

In the event the client determines to engage BCR Wealth Strategies to provide investment management services, BCR Wealth Strategies shall do so on a fee-only basis. If engaged, BCR Wealth Strategies shall charge an annual fee, up to 1.25%, based upon a percentage of the market value of the assets being managed by BCR Wealth Strategies. BCR Wealth Strategies' annual fee shall be prorated and charged quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter. In some cases, fees are negotiable.

BCR Wealth Strategies requires a minimum fee of \$5,000 per year and may be charged an annual administrative fee of \$300. BCR Wealth Strategies retains the discretion to negotiate the minimum fee on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

BCR Wealth Strategies may offset all or a portion of fees charged to a client for financial planning/consulting services if a client elects, based on such services, to retain BCR Wealth Strategies for investment management services.

BCR Wealth Strategies may only implement its investment management recommendations after the client has arranged for and furnished BCR Wealth Strategies with all information and authorization regarding accounts with appropriate custodians.

In its agreement with BCR Wealth Strategies, clients may authorize BCR Wealth Strategies to debit the client's custodial account(s) for the amount of BCR Wealth Strategies' fee. BCR Wealth Strategies may also invoice clients for fees.

The client may make additions to and withdrawals from account(s) at any time, subject to BCR Wealth Strategies' right to terminate an account. If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will not be adjusted or prorated based on the number of days remaining in the quarter. Clients may withdraw account assets on notice to BCR Wealth Strategies. BCR Wealth Strategies designs its portfolios as long-term investments and assets withdrawals may impair the achievement of a client's investment objectives.

An Agreement between BCR Wealth Strategies and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. BCR Wealth Strategies' annual fee shall be prorated through the date of termination and any remaining balance shall be charged or refunded to the client, as appropriate, in a timely manner.

Additions may be in cash or securities provided that BCR Wealth Strategies reserves the right to liquidate any transferred securities, or decline to accept particular securities into a

client's account. BCR Wealth Strategies may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge), and/or tax ramifications.

### **Retirement Plan Consulting**

BCR Wealth Strategies is compensated by the Plan Sponsor and/or from each participant's account for its consulting services, as determined by the Plan Sponsor, in accordance with the fee schedule included in the agreement signed by both parties.

### **Additional General Information**

BCR Wealth Strategies' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to BCR Wealth Strategies' fee, and BCR Wealth Strategies shall not receive any portion of these commissions, fees (except an investment manager's fees as previously discussed), and costs. See Item 12 for more information about brokerage transactions. In addition, the selection of third party investment manager for fixed income portfolios will result in the additional fees of such manager being charged to a client's account(s). In some cases, clients may be separately charged for required custody audit and related expenses incurred as a result of providing Trustee services.

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

BCR Wealth Strategies does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

### **Item 7 – Types of Clients**

BCR Wealth Strategies provides financial planning, consulting and investment management services to individuals, pension and profit sharing plans, trust estates, charitable organizations, corporations and business entities.

As a condition for starting and maintaining an investment management relationship, BCR Wealth Strategies shall generally impose a minimum portfolio size of \$250,000. BCR Wealth Strategies, in its sole discretion, may accept clients with smaller portfolios based upon

certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities. BCR Wealth Strategies shall only accept clients with less than the minimum portfolio size if, in the sole opinion of BCR Wealth Strategies, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. BCR Wealth Strategies may aggregate the portfolios of family members to meet the minimum portfolio size.

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

### *Methods of Analysis and Investment Strategy*

BCR Wealth Strategies' services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. BCR Wealth Strategies' investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. BCR Wealth Strategies recommends diversified portfolios.

Although all investments involve risk, BCR Wealth Strategies' investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients. BCR Wealth Strategies' investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that BCR Wealth Strategies' strategy seeks to minimize.

In addition to mutual funds and exchange trade funds, clients may hold or retain other types of assets as well, and BCR Wealth Strategies may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

BCR Wealth Strategies' strategies do not utilize securities that BCR Wealth Strategies believes would be classified as having any unusual risks, and BCR Wealth Strategies does not recommend frequent trading, which can increase brokerage and other costs and taxes.

### *Analysis of a Client's Financial Situation*

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, BCR Wealth Strategies relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, BCR Wealth Strategies may use a Monte Carlo simulation, a statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:



- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

### *Risk of Loss*

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

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by BCR Wealth Strategies may include funds invested in domestic and international equities, including real estate investment trusts (REITs), fixed income securities and commodities. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in BCR Wealth Strategies' investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by BCR Wealth Strategies may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

The firm typically completes all quarterly rebalancing before the last week of the quarter to prevent settling over two months/quarters.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses within each applicable sector.

## **Item 9 – 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 BCR Wealth Strategies or the integrity of the Firm's management. BCR Wealth Strategies does not have any disciplinary information applicable to this Item to disclose.

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

Neither BCR Wealth Strategies, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither BCR Wealth Strategies, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

BCR Wealth Strategies does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person.

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

BCR Wealth Strategies has adopted a Code of Ethics expressing its commitment to ethical conduct. BCR Wealth Strategies' Code of Ethics describes its fiduciary duties and responsibilities to clients and sets forth BCR Wealth Strategies' practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with BCR Wealth Strategies may buy and sell mutual funds for their personal accounts identical or different than those recommended to clients. It is the expressed policy of BCR Wealth Strategies that no person employed by BCR Wealth Strategies shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, BCR Wealth Strategies requires that anyone associated with its advisory practice with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the Chief Compliance Officer.

BCR Wealth Strategies' Code of Ethics further includes a policy prohibiting the use of material nonpublic information and protecting the confidentiality of client information. BCR Wealth Strategies requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

BCR Wealth Strategies will provide a complete copy of its Code of Ethics to any client, or prospective client, upon request.

## Item 12 – Brokerage Practices

BCR Wealth Strategies recommends TD Ameritrade Institutional, a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Factors which BCR Wealth Strategies considers in recommending TD Ameritrade or any other broker-dealer/custodian to clients include their respective financial strength, reputation, execution, pricing, research, and service.

For BCR Wealth Strategies to offer its investment management services, clients must generally agree to name TD Ameritrade as the custodian of the client accounts. Clients must further agree to direct that transactions in TD Ameritrade accounts will be arranged by BCR Wealth Strategies only through TD Ameritrade. The commissions and/or transaction fees charged by TD Ameritrade may be higher or lower than those charged by other broker-dealers.

BCR Wealth Strategies attempts to negotiate for clients reasonable commission rates and other fees charged by TD Ameritrade. TD Ameritrade receives its compensation from such fees. Clients’ fees charged by TD Ameritrade, nevertheless, are subject to the clients’ agreement with TD Ameritrade, or another custodian.

A client must direct BCR Wealth Strategies in writing to use a particular broker-dealer to execute transactions for the client. BCR Wealth Strategies will not seek better execution services or prices from other broker-dealers. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices on transactions for the account than would otherwise be the case. BCR Wealth Strategies may decline a client’s request to direct brokerage to a broker/custodian other than TD Ameritrade, if in BCR Wealth Strategies’ sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

BCR Wealth Strategies does and may assist clients with the management of certain investments and funds at additional other custodians of client assets. For example, clients may provide BCR Wealth Strategies with the authority to assist with the management of investment products and retirement assets that are held at or by specific third parties.

BCR Wealth Strategies does not generally aggregate any client securities transactions with other client transactions. BCR Wealth Strategies would engage in such batching based on a specific situation in which BCR Wealth Strategies determined that clients would receive a benefit, subject to the authority from clients, to arrange securities transactions at the same brokers as other clients.

BCR Wealth Strategies will refund to clients any losses it causes related to trade errors while arranging securities transactions. Gains resulting from trade errors will be donated to

charity.

BCR Wealth Strategies participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program.

## **Item 13 – Review of Accounts**

### **Investment Management Services:**

For those clients to whom BCR Wealth Strategies provides investment management services, BCR Wealth Strategies' Investment Advisor Representatives monitor those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis.

### **Financial Planning and Consulting Services:**

For those clients to whom BCR Wealth Strategies provides financial planning and/or consulting services, reviews are conducted on an "as needed" basis.

### **Regular Reports Provided to Clients:**

#### **Investment Management Services:**

Those clients to whom BCR Wealth Strategies provides investment management services will receive a report from BCR Wealth Strategies that will include account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis.

#### **Financial Planning and Consulting Services:**

Those clients to whom BCR Wealth Strategies provides financial planning and/or consulting services will receive reports from BCR Wealth Strategies summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by BCR Wealth Strategies.

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

BCR Wealth Strategies may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, BCR Wealth Strategies may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of an unaffiliated with BCR Wealth Strategies and there is no employee or agency relationship between them. TD

Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise BCR Wealth Strategies and has no responsibility for BCR Wealth Strategies' management of client portfolios or any other advice or services. BCR Wealth Strategies pays TD Ameritrade an on-going fee for each successful client referral. For referrals that occurred through AdvisorDirect before April 10, 2017, this fee is a percentage (not to exceed 25%) of the advisory fee that the client pays to BCR Wealth Strategies ("Solicitation Fee"). For referrals that occurred through AdvisorDirect on or after June 9, 2017, the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 25% of 1%, unless such client assets are subject to Special Services Addendum. In case of a Special Services Addendum, the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 10% of 1%. BCR Wealth Strategies will also pay TD Ameritrade the solicitation Fee on any assets received by BCR Wealth Strategies from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired BCR Wealth Strategies on the recommendation of such referred client. BCR Wealth Strategies will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

BCR Wealth Strategies participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, BCR Wealth Strategies may have an incentive to recommend to clients that the assets under management by BCR Wealth Strategies be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, BCR Wealth Strategies has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. BCR Wealth Strategies' participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

TD Ameritrade provides BCR Wealth Strategies with access to institutional trading and custody services, which are typically not available to retail investors. The services include brokerage, custody, research, and access to mutual funds and other investments that may not otherwise be generally available only to institutional-type investors. These services generally are available to independent investment advisors at certain charges to the

investment adviser by TD Ameritrade.

As disclosed under Item 12 above, BCR Wealth Strategies participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between BCR Wealth Strategies' participation in the program and the investment advice it gives to its Clients, although BCR Wealth Strategies receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving BCR Wealth Strategies participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to BCR Wealth Strategies by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by BCR Wealth Strategies' related persons. Some of the products and services made available by TD Ameritrade through the program may benefit BCR Wealth Strategies but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help BCR Wealth Strategies manage and further develop its business enterprise. The benefits received by BCR Wealth Strategies or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

As part of its fiduciary duties to clients, BCR Wealth Strategies endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by BCR Wealth Strategies or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the BCR Wealth Strategies' choice of TD Ameritrade for custody and brokerage services.

## **Item 15 – Custody**

BCR Wealth Strategies has entered into an independent service agreement with TD Ameritrade by which TD Ameritrade agrees to execute clients' securities transactions, and report to the client directly, regarding all transactions and quarterly statements of accounts. Clients should expect to receive these from TD Ameritrade either in paper or electronically. The client will make this selection for account information directly with TD Ameritrade, or another custodian.

All clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains clients' investment assets. BCR Wealth Strategies urges clients to carefully review such statements and compare such official custodial records to the account statements that BCR Wealth Strategies may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you are not receiving at least quarterly custodial account statements, please contact our Chief Compliance Officer at (205) 298-1234.

BCR Wealth Strategies is deemed to have custody of clients' funds as a result of holding client "login information" to access client accounts. As a result the firm is required to undergo a surprise audit on an annual basis by an independent public accountant that is registered with, and is subject to regular inspection by, the Public Company Accounting Oversight Board.

For accounts where the client requests the use of third party SLOAs, the firm is deemed to have custody of client funds or securities. BCR Wealth Strategies is not required to obtain a surprise annual examination of client assets; however, we are required to list these accounts in Item 9 of ADV Part 1.

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

For discretionary accounts, BCR Wealth Strategies requires that it be provided with written authority by each client to determine which securities and the amounts of securities that are bought or sold. BCR Wealth Strategies receives this discretion in advisory agreements with clients. Any limitations on this discretionary authority must be provided to BCR Wealth Strategies in writing.

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

As a matter of firm policy and practice, BCR Wealth Strategies does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. BCR Wealth Strategies may provide advice to clients regarding the clients' voting of proxies.

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

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about their financial condition. BCR Wealth Strategies has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

In an effort to support companies and industries impacted by the current Covid-19 pandemic, on March 27, 2020, Congress passed the CARES Act. A key component of the

CARES Act is the Paycheck Protection Program (PPP). The PPP was intended to provide low interest and forgivable loans to businesses and the self-employed to help retain employees and cover certain expenses. The Small Business Administration, SBA, has so far issued 4.2 million loans to small business owners throughout the US since the rollout of the program. Our firm applied for a loan to participate in the Paycheck Protection Program as part of the CARES Act and was granted one on April 10, 2020 in the amount of \$153,600. The company intends to use the loan proceeds for purposes consistent with the PPP; certain amounts of the loan may be forgiven if they are used for qualifying expenses as described in the CARES Act.



**Item 1- Cover Page**

**Sandra Mitchell Cleveland  
BCR Wealth Strategies, LLC**

1952 Urban Center Parkway, Vestavia, AL 35242-2594

205-298-1234

September 1, 2021

**This Brochure Supplement provides information about Sandra Cleveland that supplements the BCR Wealth Strategies Brochure. You should have received a copy of that Brochure. Please contact us at (205) 298-1234 or at [kclayton@bcrwealth.com](mailto:kclayton@bcrwealth.com), if you did not receive BCR Wealth Strategies' Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Sandra Cleveland is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Ms. Cleveland's CRD number is 4570085.**

## **Item 2- Educational Background and Business Experience**

SANDRA CLEVELAND, CCPS, CFP®

BORN: 1949

### **EDUCATION:**

- University of Alabama – 1971, BS, Mathematics
- Birmingham Southern College – 1996, MPPM

### **EMPLOYMENT HISTORY:**

- Managing Member, BCR Wealth Strategies, 09/2011 to present. Financial Advisor 01/2006 to 09/2011.
- Owner and Member of Financial Management Group, LLC from 04/2007 to 2014.
- Owner and Member, RCB Properties, 2013 to Present.
- Registered Representative, Ameritas Investment Corp./Nowlin and Associates, 10/2003 to 03/2006.

### **CFP® – Certified Financial Planner Minimum Qualifications**

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

## **CCPS - Certified College Planning Specialist – Minimum Qualifications**

Designation	Certified College Planning Specialist
Designation Status	Currently offered and recognized by the issuing organization
Acronym	CCPS
Issuing Organization	National Institute of Certified College Planners
Prerequisites/Experience Required	Candidate must meet <u>one</u> of the following requirements: <ul style="list-style-type: none"><li>• Professional financial certification/designation or</li><li>• Professional financial license (securities, insurance, accounting, etc.), or</li><li>• A combination of education and experience deemed satisfactory by the NICCP Advisory Council</li></ul>
Educational Requirements	Self-study course (three modules totaling 18 to 25 hours)
Examination Type	Final course exam for each module
Continuing Education/Experience Requirements	12 hours per year

### **Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

### **Item 4- Other Business Activities**

No other business activities.

### **Item 5- Additional Compensation**

No compensation from third parties for providing advisory services.

### **Item 6 - Supervision**

Ms. Cleveland is a Member of BCR Wealth. Client accounts are subject to regular review and verification that asset balances are being managed in accordance with a client's investment guidelines. If you need to contact another person at BCR Wealth please contact Marshall Rathmell at 1952 Urban Center Parkway, Vestavia, AL 35242- 2594. Telephone number: 205-298-1234.

**Item 1- Cover Page**

**Marshall Peter Rathmell  
BCR Wealth Strategies, LLC**

1952 Urban Center Parkway, Vestavia, AL 35242-2594

205-298-1234

September 1, 2021

**This Brochure Supplement provides information about Marshall Rathmell that supplements the BCR Wealth Strategies Brochure. You should have received a copy of that Brochure. Please contact us at (205) 298-1234 or at [kclayton@bcrwealth.com](mailto:kclayton@bcrwealth.com), if you did not receive BCR Wealth Strategies' Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Marshall Rathmell is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Rathmell's CRD number is 5657799.**

## Item 2- Educational Background and Business Experience

MARSHALL RATHMELL, CFP®, CPA, PFS

BORN: 1980

### EDUCATION:

- Graduated from the University of Alabama in 2005 with a Masters degree in Accounting and in 2004 with a B.S. in Commerce and Business Administration.

### BUSINESS EXPERIENCE:

- Managing Member, BCR Wealth Strategies, LLC 09/2011 to Present. Financial Advisor 02/2009 to 09/2011.
- Owner and Member, RCB Properties, 2013 to Present.
- Accounting Policy Manager, Compass Bank, 07/2007 to 02/2009
- Auditor, Deloitte & Touche, LLP, 09/2005 to 07/2007

### CFP – Certified Financial Planner Minimum Qualifications

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

**Certified Public Accountant (CPA)** is the title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met

additional state education and experience requirements for certification as a CPA.

### **PFS - Personal Financial Specialist Minimum Qualifications**

Issued by: The American Institute of Certified Public Accountants (AICPA)

Prerequisites/Experience Required: Candidate must meet all of the following requirements:

- Be a member of the AICPA;
  - Hold an unrevoked CPA certificate issued by a state authority;
  - Earn at least 100 points under the PFS point system. For example, 30 points are awarded for each year of 1,200 hours of experience; up to 40 points are awarded for passing various exams; one point is awarded for three CPE credits, etc. (See the PFS Credential Handbook for more on earning PFS points);
    - Substantiate business experience in personal financial planning-related services
- Educational Requirements: CPA plus personal financial planning specific education (See the PFS Credential Handbook)

Examination Type: Final Certification Exam

Continuing Education/Experience Requirements: A combined total of 60 PFS points in personal financial planning business experience and qualified "life-long learning" activities every 3 years. The PFS point system is described in the PFS Credential Handbook.

### **Item 3- 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 each supervised person providing investment advice. No information is applicable to this Item.

### **Item 4- Other Business Activities**

No other business activities.

### **Item 5- Additional Compensation**

No compensation from third parties for providing advisory services.

### **Item 6 - Supervision**

Mr. Rathmell is the Managing Member of BCR Wealth. Client accounts are subject to regular review and verification that asset balances are being managed in accordance with a client's investment guidelines. If you need to contact another person at BCR Wealth please contact Sandra Cleveland at 1952 Urban Center Parkway, Vestavia, AL 35242-2594. Telephone number: 205-298-1234.

## Item 1- Cover Page

Harold Sasnowitz

22 Lenox Avenue, Clifton, NJ 07012

Telephone: 607-238-7718

BCR Wealth Strategies, LLC

1952 Urban Center Parkway, Vestavia, AL 35242-2594

205-298-1234

September 1, 2021

**This Brochure Supplement provides information about Harold Sasnowitz that supplements the BCR Wealth Strategies Brochure. You should have received a copy of that Brochure. Please contact us at (205) 298-1234 or at [kclayton@bcrwealth.com](mailto:kclayton@bcrwealth.com), if you did not receive BCR Wealth Strategies' Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Harold Sasnowitz is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Sasnowitz's CRD number is 5313969.**

## Item 2- Educational Background and Business Experience

HAROLD SASNOWITZ, CFP®

BORN: 1946

### EDUCATION:

- Cornell University – 1969, Bachelor of Electrical Engineering
- Binghamton University – 1974, MS, Computer Science
- University of Phoenix – 1999, MBA

### BUSINESS EXPERIENCE:

- Financial Advisor, BCR Wealth Strategies, 06/2007 to Present
- Program Manager, Lockheed Martin Federal Systems, 04/1993 to 12/2006

### CFP – Certified Financial Planner Minimum Qualifications

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

## Item 3- 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 each supervised



person providing investment advice. No information is applicable to this Item.

#### **Item 4- Other Business Activities**

No other business activities.

#### **Item 5- Additional Compensation**

No compensation from third parties for providing advisory services.

#### **Item 6 - Supervision**

Mr. Sasnowitz is supervised by Marshall Rathmell, the Managing Member and Sandra Cleveland, a Member of BCR Wealth. Mr. Sasnowitz's client accounts are subject to regular review and verification that asset balances are being managed in accordance with a client's investment guidelines. Mr. Rathmell and Ms. Cleveland can be reached at 1952 Urban Center Parkway, Vestavia, AL 35242-2594. Telephone number: 205-298-1234