

Accurate Wealth Management, LLC

Wrap Fee Program Brochure

Form ADV, Part 2A

Appendix 1

This wrap fee program brochure provides information about the qualifications and business practices of Accurate Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (813) 994-0984 or by email at: gguinta@accuratewealth.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.

Additional information about Accurate Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Accurate Wealth Management, LLC's CRD number is: 298137.

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Registration as an investment adviser does not imply a certain level of skill or training.

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General

Item 2: Material Changes

Accurate Wealth Management has no material changes to this brochure to report.

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

Accurate Wealth Management, LLC (hereinafter “AWM”) provides portfolio management to clients under a wrap fee program, as described herein, as sponsor and portfolio manager.

Portfolio management fees are withdrawn directly from the client’s accounts with client’s written authorization.

Fees are paid quarterly in advance. The advisory fee is calculated using the value of the assets on the last business day of the prior billing period. Refunds for any fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client’s account. For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Clients may terminate the agreement without penalty, for full refund of AWM’s fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days written notice.

Services, Fees and Compensation

The fee schedule is set forth below:

Total Assets Under Management	Annual Fee
All accounts	Up to 2.5%

The fees are negotiable. The fees will not exceed 2.5%

B. Contribution Cost Factors

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client’s account, the adviser’s ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

C. Additional Fees

AWM will wrap third party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.) for wrap fee portfolio management accounts. AWM will charge clients one fee and pay all transaction fees using the fee collected from the client. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that AWM has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, fees associated with “step out” transactions if the account uses different custodians or broker-dealers, 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. Tax and trust service fees are not included.

AWM uses the brokerage and custody services of Schwab Advisor Services, a division of Charles Schwab & Co., an unrelated registered broker-dealer and member of FINRA/SIPC. Schwab has eliminated commissions for online trades of 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 schwab.com/aspricingguide.

Our firm receives economic benefit from Schwab in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described in our Firm brochure (*see Item 14 of the Firm brochure*). The availability of Schwab’s products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

D. Compensation of Client Participation

Neither AWM, nor any representatives of AWM receive any additional compensation beyond advisory fees for the participation of clients in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, AWM may have a financial incentive to recommend the wrap fee program to clients.

Item 5: Types of Clients

There is no account minimum.

Item 6: Portfolio Manager Selection and Evaluation

A. Selecting/Reviewing Portfolio Managers

AWM will select outside portfolio managers for management of this wrap fee program.

AWM will use industry standards to calculate portfolio manager performance.

AWM reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed by AWM.

B. Related Persons

AWM and its personnel serve as the portfolio managers for all wrap fee program accounts.

C. Advisory Business

AWM offers ongoing wrap fee portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AWM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Determine investment strategy
- Asset allocation
- Assessment of risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

AWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon.

Portfolio management accounts participating in the wrap fee program will not have to pay for transaction or trading fees. AWM will charge clients one fee and pay transaction fees using the advisory fee collected from the client. Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, 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.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that AWM has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, AWM will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

Services Limited to Specific Types of Investments

AWM generally limits its investment advice to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, REITs, insurance products including annuities, private placements, and government securities. AWM may use other securities as well to help diversify a portfolio when applicable.

Client Tailored Services and Client Imposed Restrictions

AWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients are not permitted to impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

As discussed herein, AWM acts as manager for this wrap fee program. AWM manages the investments in the wrap fee program in the same way in which it manages non-wrap fee accounts.

Amounts Under Management

AWM has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$295,872,312	\$0	June 30, 2020

Performance-Based Fees and Side-By-Side Management

Except for wrap accounts in the McElhenny Sheffield Capital Management covered call portfolio, which is not accepting new accounts, AWM does accept performance-based fees or other fees based on a share of capital gain or capital appreciation of the assets of a client.

Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

Methods of Analysis and Investment Strategies

Methods of Analysis and Investment Strategies

When we manage a client's portfolio, we start with an individualized asset allocation method. When deciding on the asset allocation for a client, we take into account the client's risk tolerance, goals, investment objectives and other data gathered during the client meetings. Asset Allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon among various asset classes. The asset classes typically include equities, fixed Income, and cash and equivalents. Each class has different levels of risk and return, so each will behave differently over time.

After establishing a client's individualized asset allocation, we use a combination of fundamental and technical analysis to purchase or sell securities within the account. Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis is that despite that appearance that a security is undervalued, it may not rise in value as predicted.

Technical Analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The risk associated with technical analysis is that there is no broad consensus among technical traders on the best method of identifying future price movements.

Our analysis of securities and advice relating thereto may be based upon information obtained from financial newspapers and magazines, research materials prepared by others, corporate ratings services, and annual reports, prospectuses and filings made with the Securities and Exchange Commission. We may also utilize third party analytical tools for performance analysis, asset allocation and risk management.

With respect to our Selection and Monitoring of Third-Party Advisers, we will meet with each client to obtain the client's financial situation, goals and risk tolerance. With this information, we will recommend a Third-Party Adviser that we believe meets the client's financial situation, goals and risk tolerance. We will use various sources of information to help recommend a Third-Party Adviser for the client. These sources include but are not limited to Third Party Adviser's ADV Part 2A, marketing materials, financial newspapers and magazines, research prepared by other advisers, company press releases, prospectuses, and other SEC filings.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Methods of Analysis

We may use several types of securities in our clients' accounts. These securities may include, but are not limited to, the following: Stocks; Bonds; Exchange Traded Funds; Mutual Funds; Government Debt instruments Including Treasury Bills and Municipal

securities; Traded Real Estate Investment Trusts; and Money Market Funds and Cash.

All investments bear different types and degrees of risk **and investing in securities involves risk of loss that clients should be prepared to bear.** While we use investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. Clients should feel free to ask questions about risks they do not understand we would be pleased to answer all questions.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. A client's account performance could be hurt by:

- **Options Risk:** Like other securities - including stocks, bonds, and mutual funds - options carry no guarantees, and a person must be aware that it is possible to lose all of the principal he/she invests, and sometimes more. As an option holder, a person risks the entire amount of the premium he/she paid pay. But as an options writer, a person takes on a much higher level of risk. For example, if a person writes an uncovered call, he/she faces unlimited potential loss, since there is no cap on how high a stock price can rise. Since initial options investments usually requires less capital than equivalent stock positions, potential cash losses as an options investor are usually smaller than if someone bought the underlying stock or sold the stock short. The exception to this general rule occurs when an option is used to provide leverage: Percentage returns are often high, but it is important to remember that percentage losses can be high as well.
- **Covered Call Risk:** A covered call involves selling call options against stock owned in a portfolio. Covered call sellers have to hold onto underlying shares or contracts or they'll be holding naked calls, which have theoretically unlimited loss potential if the underlying security rises. Therefore, sellers need to buy back options positions before expiration if they want to sell shares or contracts, increasing transaction costs while lowering net gains or increasing net losses. We do not permit naked options writing in our wrap fee program.
- **Stock Market Risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- **Interest Rate Risk:** The chance that bond prices overall will decline because of rising interest rates.
- **Manager Risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign

securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.

- **Liquidity Risk:** One Common risk associated with private placements and REITs is a relative lack of liquidity due to the highly customized nature of the investment. Moreover, the full extent of returns is often not realized until maturity. Because of this, these products tend to be more of a buy-and-hold investment decision rather than a means of getting in and out of the position with speed and efficiency.
- **Credit Risk:** This is the risk that in issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of your investment and/or the future purchasing power of your assets.

Risks of Specific Securities Utilized

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Securities (Proxy Voting)

AWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security. In the case of investments in GS separately managed account available from Fidelity and Schwab, we are required to permit GS to vote proxies on behalf of holders.

Item 7: Client Information Provided to Portfolio Managers

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to the portfolio manager. The portfolio manager will also have access to that information as it changes and is updated.

Item 8: Client Contact with Portfolio Managers

AWM does not restrict clients from contacting portfolio managers. AWM's representatives can be contacted during regular business hours using the information on the Form ADV Part 2B cover page.

Item 9: Additional Information

A. Disciplinary Action and Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-Regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Registration as a Broker/Dealer or Broker/Dealer Representative

A number of our investment adviser representatives are also registered representatives of AAG Capital, Inc., an affiliated broker/dealer.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither AWM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AWM does select third-party investment advisers for this wrap fee program. Investment adviser representatives are permitted to select Third Party Advisors from a list approved by AWM. In cases where a Third Party Adviser is selected, the Third Party Advisor and AWM will share the management fee charged by the Third Party Adviser. This creates a conflict of interest, since AWM has an incentive to select Third Party Advisers that agree to allow AWM to retain a larger share of the overall fee. This conflict is addressed through applying standard selection criteria to the Third Party Advisors and

monitoring their performance. AWM ensures that products offered by selected Third Party Advisors are appropriate for clients' investment objectives and risk profile, and Investment Advisor Representatives may select Third Party Advisor products from a curated list.

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

Code of Ethics

AWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AWM's Code of Ethics is available free upon request to any client or prospective client.

Recommendations Involving Material Financial Interests

AWM does not recommend that clients buy or sell any security in which AWM or a related person has a material financial interest.

Investing Personal Money in the Same Securities as Clients

AWM will in some instances recommend to clients' securities in which the firm or its representatives also invest.

Trading Securities At/Around the Same Time as Clients' Securities

Not applicable - see "Investing Personal Money in the Same Securities as Clients" response above.

Frequency and Nature of Periodic Reviews

Accounts are reviewed at least annually with regard to clients' respective investment policies and risk tolerance levels.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive a quarterly account statement from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

AWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to AWM clients.

Compensation to Non – Advisory Personnel for Client Referrals

AWM does not directly or indirectly compensate any person for client referrals.

Balance Sheet

AWM neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

AWM does not have any financial condition that would impair its ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

AWM has not been the subject of a bankruptcy petition.

Item 10: Requirements For State Registered Advisers

Not applicable.