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## Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Stash Wealth, LLC. If a client has any questions about the contents of this brochure, please contact us by email at: [hey@stashwealth.com](mailto:hey@stashwealth.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 Stash Wealth, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Stash Wealth is a registered investment advisor. Registration as an investment advisor does not imply a certain level of skill or training.

Stash Wealth, LLC's CRD number is: 167072

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November 29, 2023

## Item 2: Material Changes

As this is the Firm's initial application for SEC registration, there are no material changes to note. In the future, this section will identify and describe any material changes from the previous annual update.

## Item 3: Table of Contents

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## Item 4: Advisory Business

### A. Description of the Firm

Stash Wealth, LLC is a limited liability company organized in the state of Delaware. The firm was formed in April of 2013, and the principal owner is Priya Malani.

### B. Types of Services

Stash Wealth, LLC (hereinafter, “SW” or “Stash Wealth”) works with HENRYs™ (a.k.a. **H**igh **E**arners, **N**ot **R**ich **Y**et) and offers the following services to its clients:

#### **Stash Plan®**

SW offers two planning engagements: (i) Stash Plan® for Individuals, and (ii) Stash Plan® for Couples. Financial planning services may include, but is not limited to:

- Cash-flow planning
- Retirement Planning
- Business Planning
- Debit/Credit Planning
- Investment Planning
- Tax Planning
- College Planning
- Insurance Needs Analysis
- Estate Planning Analysis
- Corporate Benefits Analysis
- Student Loan Analysis

When clients purchase the Stash Plan®, an advisor from SW works with the client to create a financial plan which outlines a client’s current financial situation including but not limited to income, tax levels and financial goals and then constructs a plan to aid in the selection of a portfolio that matches a client’s financial goals. If a client does not need financial planning services in a specific area, Stash Wealth will provide education in that area, to account for any potential future need.

Financial planning services are offered as a stand-alone service in addition to advisory services. Individuals who receive a financial plan have the right to decide whether to act upon the recommendations independently or implement the plan with SW. Because, in the context of a financial plan we can recommend that a client engage in investment management services, which SW provides, there is a conflict of interest. SW does not receive any compensation for sale of securities or other products or services.

#### **Stash Management®**

Once a client has completed the Stash Plan® process, the client has the option of separating from SW or continuing by engaging SW to receive wealth management services via the Stash Management® Service (the “SM Service”). The SM Service covers comprehensive advisory services for clients, including a recalibration of the client’s Stash Plan®. Clients are not required to engage in an annual recalibration, however, if they skip more than one year (i.e., two to three years) SW reserves the right to terminate its contract with the client.

Engagement with the SM Service involves access to SW for ongoing financial advice, Stash Plan® implementation and annual financial plan updates. SW will also identify a team of experts who can provide support such as tax support, estate planning, protection and creative lending professionals. This team of experts are not directly employed by SW but are recommended to assist clients with needs other than advisory services. Clients who choose to engage an expert do so at their discretion and expense.

Advisory services include asset management support based on the financial goals outlined in the client's Stash Plan® including, but not limited to, the following:

- Stash Model Portfolios
- Investment strategy
- Portfolio Rebalancing
- Asset allocation
- Tax loss harvesting
- Investment advice

SW evaluates the current investments of each client with respect to their financial goals and recommends model portfolios based on time horizon of the goal. SW further educates clients through conversations about how risk affects returns. SW does not make investment decisions based on investment objectives or risk tolerance, and as a result, clients should understand that their actual portfolio risk may be more or less than they are comfortable with. This is documented in the Stash Management® Service Agreement, which is acknowledged and accepted by the client upon subscription of the SM Service.

SW uses a team-based approach to provide advisory services. If clients receive advisory services on multiple occasions, they are likely to interact with multiple financial personnel.

Services are based on fees as outlined in Item 5: Fees and Compensation.

#### **Educational Seminars and Speaking Engagements**

SW may offer seminars on an "as announced" basis for groups seeking general advice on personal finance. The content of these seminars will vary depending on the needs of the attendees and is available to all clients. These seminars are purely educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person's need, or on individualized investment advice to attendees.

#### **Additional Services**

SW provides educational videos to individuals and couples that can be purchased on the SW website. The videos discuss financial planning advice such as budgeting guidance, savings information, debt reduction and retirement planning. The videos do not include specific investment recommendations or performance related data.

SW also offers regular newsletters that the public can sign up to receive via email. The newsletter offers practical financial advice for millennials (a.k.a. HENRYs - High Earners, Not Rich Yet) with occasional market commentary. Newsletters do not include specific investment recommendations or performance related data and there is no fee involved to sign up to receive the newsletter.

### C. Client Tailored Services and Client Imposed Restrictions

SW has built a proprietary dashboard (the “Stashboard™”) which allows clients to securely transmit financial documents to our planning team. Access to the Stashboard™ is made available to the client during the term of their engagement with Stash Wealth’s services. There is no cost for this service.

SW offers the same suite of services to all of its clients. However, specific client financial advice and its implementation is dependent upon the client’s Stash Plan®, which outlines each client’s current situation (income and tax levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and goals.

Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SW from properly servicing the client account, or if the restrictions would require SW to deviate from its standard suite of services, SW reserves the right to terminate the relationship.

### D. Wrap Fee Programs

SW does not participate in any wrap fee programs.

### E. Assets Under Management

Discretionary	Non-discretionary	Date
\$39,462,659	\$0	10/31/23

## Item 5: Fees and Compensation

### A. Fee Schedule

#### Financial Planning Fees

**Stash Plan® for Individuals \$1000.00** For HENRYs only, this is a multi-week engagement between the client and SW. Over several weeks, SW will evaluate the client’s financial situation to develop a comprehensive financial game plan. The plan centers around providing the client with the necessary steps to take to get on track for their short-, mid-, and long-term financial goals.

**Stash Plan® for Couples \$1,500.00.** For HENRY couples only, this is a multi-week engagement between the couple and SW. Over several weeks, SW will meet virtually with the client and his or her partner to discuss the couple’s current and future financial goals and develop a comprehensive financial plan. The plan centers around providing the couple with the necessary steps to take to get on track for their short-, mid-, and long-term financial goals.

### Subscription Process

Upon subscribing to any of the Stash Plan® engagements clients will have six (6) months to complete the Stash Plan® process which includes two meetings with a financial planner, submitting the appropriate financial information and access to the Stashboard™. This process usually takes about 5-6 weeks for the typical client. When the Stash Plan® process is complete the client will have ninety (90) days to take the following action: (i) subscribe to the SM Service for continued support for the client's established Stash Plan®; or (ii) conclude the relationship with SW. SW will send clients an email reminder of the ninety (90) day expiration. For the avoidance of doubt, once the Stash Plan® process has been completed, Stash Wealth will have no further obligation to continue to work with the client unless the client decides to hire SW to execute and manage the Stash Plan®. In such event, the client will subscribe to the SM Service and will be charged the fees in accordance with the SM Service fee schedule below. Unless an exception is made by SW, the Stash Plan® is a prerequisite to the SM Service.

Clients who choose not to engage in the SM service, which includes an annual financial plan update, are invited to update their plan on an annual basis for the cost of **\$897.00**.

### Advisory Services Fees

**Stash Management®.** The SM Service fees are subject to the breakpoints in accordance with the fee schedule below. Fees are withdrawn directly from the client's account by the custodian on a monthly basis, billed in arrears. At no time will the fee be less than \$90 per month.

Fees are assessed on accounts managed by SW excluding current employer retirement plans and 529 accounts. Fees are negotiable at SW's sole discretion. Client should be aware that lower fees for comparable services may be available from other sources.

Assets Under Management	Fee
Up to \$250,000.00	1.2%
\$250,000.01 - \$500,000	1.1%
\$500,000.01 - \$600,000	1.0%
\$600,000.01 - \$700,000	0.90%
\$700,000.01 - \$800,000	0.80%
\$800,000.01 - \$900,000	0.70%
\$900,000.01 - \$1,000,000	0.60%
\$1,000,000.01 and up	0.50%

### Educational Seminars and Speaking Engagements

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees range from \$750 - \$10,000. The fee will be announced in advance of the workshop and will be determined by



the number of events being purchased (i.e., package), in addition to whether or not educational materials are being provided.

### **Additional Services**

SW offers to the public an educational videos series and related online workbooks that can be purchased two ways. A five-video series is offered at a cost of \$247. And a six-video series is offered at a cost of \$284. If the five-video series is purchased, the purchaser has the option to add on the sixth video which contains content specific to relationships for an additional \$37. On occasion, limited time discounts and/or promotional codes may be offered. We also offer an educational newsletter at no charge.

## **B. Payment of Fees**

### **Payment of Financial Planning Fees – The Stash Plan®**

Fixed financial planning fees are charged to the client directly via SW's website through a third-party credit/debit card processing vendor. Fees are paid with a credit card only immediately upon subscription to any of the offerings. The Stash Plan® is paid for immediately and commences the engagement between the client and SW.

Meetings that are rescheduled by the client within 24 hours of the meeting date and time will be charged a rescheduling fee of \$75. The fee will be authorized to client's Payment Method with or without notice to client.

### **Payment of Advisory Fees – The SM Service™**

Fees for Regular advisory clients are withdrawn directly from the client's account and are paid monthly in arrears. Billing commences immediately upon subscription of the SM Service.

### **Payment of Educational Seminars and Speaking Engagement Fees**

SW typically invoices the event client prior to the event with net 30 payment terms.

### **Payment of Fees & Reimbursement – The Stash Plan®**

If a client is unable to begin the Stash Plan® process after subscription, the client can contact SW and SW will calculate and evaluate unearned fees, if any, and consider a refund on a case-by-case basis. Furthermore, SW strives to give clients a positive and fulfilling experience, however, if a client is dissatisfied with SW's service they may request a refund request form to provide feedback and request a refund by emailing [hey@stashwealth.com](mailto:hey@stashwealth.com). SW will, in our sole discretion, consider a partial or full refund based on unearned fees, if any, less a \$75 administrative fee.

## **C. Clients Are Responsible for Third Party Fees**

Clients are responsible for the payment of all fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the Stash Management® fees and expenses charged by SW. Please see Item 12 of this brochure regarding broker/custodian fees.

#### D. Payment of Advisory Fees - The Stash Management® Service

SW collects fees during the first week of the month, based on the daily average account balance of the preceding month. Should the client decide to discontinue the SM Service, assets will remain subject to fee schedule until transferred out, on an account by account basis. Clients are billed \$0 for the month during which the final account is transferred out to prevent a negative account balance.

#### E. Outside Compensation for the Sale of Securities to Clients

Neither SW nor its supervised persons accept any compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

### Item 6: Performance-Based Fees and Side-By-Side Management

SW does not accept performance-based fees and does not engage in side-by-side management.

### Item 7: Types of Clients

SW generally provides financial planning, investment advice and/or management supervisory services to the following types of clients:

- Individuals

SW generally provides financial seminars and speaking engagements for the following types of clients:

- Organizations, corporations, and businesses

#### Minimum Account Size

There is no account size minimum for the Stash Plan® or the Stash Management® Service. There is a minimum monthly fee of \$90 for the SM Service (\$1,080.00 annually).

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

#### A. Methods of Analysis and Investment Strategies

##### Methods of Analysis

During the development of a client's Stash Plan®, SW will gather and consider several factors including a client's current financial situation, career path and investment goals and objectives to recommend a model portfolio based on a client's investment time horizon that the client can implement on their own or via the SM Service. Generally, SW's investment advice is based on Modern Portfolio Theory and the belief that proper diversification and risk management will provide an investor with a stable and consistent return over time. The practice of Modern

Portfolio Theory does not employ market-timing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

### **Investment Strategies**

Generally, SW does not engage in general market-timing, or specific timing of economic cycles, asset or sector classes, or individual securities. SW's primary approach is passive asset allocation aimed at reducing overall portfolio risk through diversification. The asset allocations are based upon tenets of Modern Portfolio Theory. Such an approach considers the client's stated financial goal and is based upon assumptions about future economic factors such as inflation, interest rates, and the risk and return characteristics of asset classes and their correlations. This is affected through the use of ETFs and/or mutual funds, equities and cash equivalents. Such assets are all subject to varying degrees of investment, market, credit, interest rate, and regulatory risks. Moreover, clients should be aware that diversification does not ensure a profit or protect against a loss in a declining market. There is no guarantee that any particular asset allocation or mix of funds will meet their investment objectives or provide a given level of income or return.

At times, SW may choose to blend passive (or index) and active investing to assist in the over-or under allocation to specific themes, sectors, regions, assets classes, etc. SW may also buy and sell positions that are more short-term in nature, depending on the goals of the client and/or the fundamentals of the security, sector or asset class.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

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

### **Types of Investments**

SW typically recommends portfolios that contain investment vehicles considered diversified, tax efficient and low-cost whenever practical. It would be common to find a broad range of ETFs, index funds, no-load and/or no transaction fee mutual funds within a portfolio. SW may also recommend an investor retain pre-existing holdings when appropriate due to tax or other implications.

## **B. Material Risks Involved**

SW believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk. However, there are risks associated with investing, and as such it is not possible for SW to guarantee any level of performance or that an investment objective or planning goal will be achieved. There are many different risk items inherent in investing for all clients, which may affect the probability of success and amount of potential loss. Clients should be aware of, and consider, the risks outlined below - but also recognize that this may not be all inclusive - before retaining SW, or any investment advisory services.

### **Company Risk**

When investing in securities, such as stocks, there is always a certain level of company or industry specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and

can be reduced or mitigated through appropriate diversification.

### **Socially Conscious Investing**

If clients require their portfolio to be invested according to socially conscious principles, clients should note that returns on investments of this type may be limited and because of this limitation clients may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

### **Failure to Implement**

Financial planning clients always have the right to accept or reject any or all of the recommendations made to them. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved. Additionally, if any of the information provided by the client is incomplete or inaccurate, the resulting portfolio may not adequately meet the client's financial goals. SW reserves the right to terminate a client's participation in the Stash Management® Service Agreement if SW determines, in its sole discretion, that the client is unresponsive or otherwise uncommitted to the program.

### **Financial Risk**

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### **Inflation Risk**

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

### **Market Risk**

When the stock market as a whole or an industry as a whole fails, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

### **Passive Markets Theory**

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class. We believe this variance from the expected return is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

### **Research Data**

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm

makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

### C. Risks of Specific Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Exchange Traded Funds (ETFs)** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**Mutual Funds** investing in mutual funds carries the risk of capital loss and thus a client may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond and fixed income nature (lower risk), or stock equity nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds** The risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Stocks** Investing in stocks carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

**Real Estate Funds** face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth- oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

**Precious Metal ETFs** (Gold, Silver, and Palladium Bullion backed electronic shares, not physical metal) Investing in precious metal ETFs carries the risk of capital loss.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that the client should be prepared to bear.

## Item 9: Disciplinary Information

### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

### B. Administrative Proceedings

There are no administrative proceedings to report.

### C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

## Item 10: Other Financial Industry Activities and Affiliations

### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SW nor its representatives are registered as or have pending applications to become a broker/ dealer or as representatives of a broker/dealer.

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

Neither SW nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

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

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

### D. Selection of Other Advisers or Managers and How This Adviser is Compensated for those Selections

SW does not utilize nor select other advisers or third-party managers. All assets are managed by SW.

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

### A. Code of Ethics

SW holds itself to a fiduciary standard, which means we will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients. We have adopted a Code of Ethics that establishes policies for

ethical conduct for our personnel. SW accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. SW periodically reviews and amends its Code of Ethics to ensure that it remains current and requires firm personnel to annually attest to their understanding of and adherence to the Code of Ethics. A copy of the Code of Ethics is made available to any client or prospective client upon request.

#### **Recommendations Involving Material Financial Interests**

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

#### **B. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of SW buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SW to buy or sell the same securities before, during, or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. SW employs block trading, and therefore transacts its own security trading alongside client securities trading. Employees will not front-run or disadvantage clients in the execution of securities trading. Such transactions may create a conflict of interest. SW will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

#### **C. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of SW buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of SW to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SW employs block trading, and therefore transacts its own security trading alongside client securities trading. Employees will not front-run or disadvantage clients in the execution of securities trading.

### **Item 12: Brokerage Practices**

#### **A. Factors Used to Select Custodians and/or Broker/Dealers**

The custodian is selected based on the transaction fees relative to other custodians and access to mutual funds and ETFs. Additional factors used to choose the Custodian are the Custodian's support services, reputation, and cost-benefit compared to other custodians. A robust trading platform is another consideration in selecting a custodian. SW requires clients to use Apex as their custodian.

#### **Research and Other Soft-Dollar Benefits**

SW does not receive any research, products, or services from its broker-dealer or another third-party in connection with client securities transactions ("soft dollar benefits").

### **Brokerage for Client Referrals**

SW receives no referrals from a broker-dealer or third party in exchange for using that broker dealer or third party.

### **Clients Directing Which Broker/Dealer/Custodian to Use**

SW does not allow clients to direct brokerage. SW requires clients to use Apex as custodian for all client accounts.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

SW maintains the ability to block trade purchases across accounts, via a third-party technology provider. Block trading may benefit a large group of clients by providing SW the ability to purchase larger blocks resulting in smaller transaction costs to the client.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

SW invites all clients to update their Stash Plan® on an annual basis. Unless provided for as part of the SM Service, financial planning reviews will be assessed at the current rate (see Item 5). For SM Service Clients, who have engaged with SW for ongoing advisory services, Stash Plan® updates are encouraged on an annual basis whenever practical. Updates are included as part of the advisory fee.

Client accounts undergo formal reviews on an annual basis by an Investment Advisor Representative, at which point clients are invited to update SW on life & financial changes that need to be addressed. Upon formal review, financials are re-evaluated to ensure clients are invested in accordance with their most updated financial goals. Informal reviews may be conducted more or less frequently at the client's request.

The client is encouraged to notify SW if changes occur in the client's personal financial situation that might adversely affect their Stash Plan®.

### **B. 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 a client's financial situations (such as termination of employment, pregnancy, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive a statement or confirm at least quarterly from the custodian that details the client's account including assets held and asset value which will come from the custodian. SW itself does not provide clients with written report or invoice. The client may also establish electronic access to the custodian's website so that the client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the client's account(s). Clients should understand that the Custodian shows account values that are based on the last day of the month, however, SW bills the Client based on Client's average daily balance.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

SW receives compensation for referring current clients to third-party business professionals. This creates a conflict of interest that is mitigated by making such referrals only when they are pertinent to the individual being referred. In keeping with its Fiduciary duty, SW puts the needs and interests of the client first and foremost and are only making such recommendations when they provide a value-added benefit to the client.



Additionally, SW, through general web-traffic on its website or through meetings with an investment advisor representative, may direct clients to a third-party website. SW maintains a blog on its website that uses affiliate links to generate additional revenue. If a client decides to click on a link and give a third-party provider their business, Stash Wealth will receive compensation at no extra cost to the client. Links to third-party websites, advertisers, services, special offers, or other events or activities are not owned or controlled by SW. SW does not warrant, guarantee, or assume responsibility for any product or service advertised or offered by a third party through SW or any hyperlinked website or service. SW will not be a party to or in any way monitor any transactions between a client and the third-party provider of the products or service.

Individuals are under no obligation to pursue recommendation and always maintain the right to decide through whom to obtain professional services.

SW also receives compensation for writing or publishing video content that is intended to educate people about finances.

SW has reasonably disclosed all material conflicts of interest.

## **B. Compensation to Non-Advisory Personnel for Client Referrals**

SW may engage influencers to promote SW's platform and services and pays these promoters for posting about SW on their social media. SW will not charge clients any additional fees for promotional activities and no client pays more than the standard investment advisory fees disclosed under Item 5.

## **Item 15: Custody**

At no time will SW accept, maintain possession, or have custodial responsibility for the client's funds, assets or securities. The custodian will directly debit the client's advisory fee from the client's account. SW does not have access to the client's account and all funds/securities will be delivered between client and the custodian only. Instructions of SW to the client or the custodian with respect to investments shall be made in writing or electronically and confirmed as soon as practicable thereafter. If the identity of the custodian changes, then SW will provide client with prompt notice of the change and action must be taken by the client to establish an account at the new custodian. Client hereby authorizes SW to receive from the custodian a copy of any agreement between client and the custodian in effect at any time with respect to the client's account. As per state regulation, clients domiciled in the state of Colorado will receive an invoice from SW.

## **Item 16: Investment Discretion**

SW maintains investment discretion for all clients, with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. Discretionary authority is executed by agreement through the custodian account application and the Stash Management® Service Agreement. The client provides SW discretionary authority via a limited power of attorney in the Stash Management® Service Agreement and executing limited power of attorney in the contract between the client and the custodian.

SW provides financial planning advisory services (Stash Plan®) to its clients on a non-discretionary basis, meaning that all recommendations given within the scope of such services are not implemented by SW, and that the client makes the ultimate decision as to whether or not to implement such recommendations.

## **Item 17: Voting Client Securities (Proxy Voting)**

SW 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. If the client has questions regarding a particular proxy they may reach out to SW.

## Item 18: Financial Information

### A. Balance Sheet

SW does not require nor solicit prepayment of more than \$1200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SW nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### C. Bankruptcy Petitions in Previous Ten Years

SW has not been the subject of a bankruptcy petition in the last ten years.