



## Item 1: Cover Page

# Form ADV Part 2A Brochure & Form ADV Part 2B Brochure Supplement

August 2023

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This brochure provides information about the qualifications and business practices of Silicon Valley Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact the Firm's Chief Compliance Officer, Tracy Lasecke, at telephone (650) 323-3700 or via email at ([tracy@svwadvisors.com](mailto:tracy@svwadvisors.com)). The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state authority.

This Brochure provides information upon which a prospective client may determine whether or not to hire our Firm. You are encouraged to review this Brochure and Supplements regarding the Firm's associates for information on the qualifications of the Firm and its employees. The use of the term "registered investment adviser" and description of Silicon Valley Wealth Advisors, LLC and/or our associates as "registered" does not imply a certain level of skill or training.

Additional information about Silicon Valley Wealth Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our searchable IARD/CRD number is 106017. Our SEC registration number is 801-41892.

## Item 2: Summary of Material Changes

This updated Form ADV Part 2A contains the following changes from the prior version:

- Updated disclosures regarding the Firm’s selection of sub-advisors at Item 4.
- Updated disclosures regarding options securities at Item 8.
- No material updates to professional biographies at Part 2B.

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## **Item 4: Advisory Business**

Silicon Valley Wealth Advisors, LLC (“SVWA”), is an independent, fee-only wealth management and financial planning firm. With locations in San Jose and Half Moon Bay, California. Our professional financial advisors and investment specialists help wealthy individuals and families manage their investments and make sound financial decisions. Based on your needs, our team skillfully builds and manages comprehensive financial solutions for your life.

SVWA is an SEC-registered investment advisory firm that provides financial planning and investment advisory services to individual clients, as well as trusts, endowments, qualified retirement plan sponsors, and business entities. We are a fee-only firm.

When SVWA provides investment advice to you regarding your investment accounts, including your retirement plan account or individual retirement account, we are fiduciaries within the meaning of certain state and federal laws such as the Employee Retirement Income Security Act and/or the Internal Revenue Code and the regulations of the U.S. Securities and Exchange Commission, as applicable. These regulations require us to act in your best interest and not put our interests ahead of yours.

We actively seek to avoid, or at least minimize, conflicts of interest which exist between our firm and you. We sell no products. We accept no commissions. However, all investment advisory firms will likely possess some unavoidable conflicts of interest. In those instances when conflicts of interest arise, we have adopted policies which seek to keep your best interests paramount at all times. See Items 5, 11 and 12 of this Brochure, and other items, which explore in further detail how we act to keep your best interests first at all times during the course of our relationship with you.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Conflicts of interest will be disclosed to you in the unlikely event they should occur.

### **Our Principal Owner**

Tracy Lasecke, Owner and Managing Member

### **Assets under Management**

As of December 31, 2022, we managed approximately \$326,602,241 in assets on a discretionary basis and approximately \$2,547,794 on a non-discretionary basis.

## **Types of Advisory Services**

### **Asset Management**

At SVWA, we create investment portfolios that are customized to you. We don’t believe in offering our clients “one-size-fits-all” financial solutions. Instead, we focus on learning about you and your financial life—your values, experience, and goals — so that we have a clear idea of what we need to do to achieve your financial objectives. Then, we allocate your assets in a way that

balances risk and reward so that you are positioned to reach your goals. In this way, we are able to deliver the correct customized portfolio allocation and associated risk necessary for you to achieve your goals.

Advice is provided through client consultations and may include: setting financial goals & objectives, setting an investment strategy to meet those goals and objectives, selecting other advisors, where appropriate, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

We generally recommend institutional-class stock mutual funds with low annual expense ratios, and extremely low internal transaction costs. At times we may recommend other low-cost investment solutions, such as ETFs, low-cost bond funds, individual fixed income securities, and other products. For more on our investment philosophies, and the risks of our strategies and/or specific investments recommended, please refer to Item 8.

Use of Sub-advisors – SVWA may select certain sub-advisors to manage a portion of clients’ assets. In these situations, SVWA continues to conduct ongoing due diligence and monitoring of such sub-advisors, but such recommendations depend on the Sub-advisors’ ability to successfully implement their investment strategies.

For example, for those clients interested in adding option securities (see Item 8 for a description of such securities) to their portfolio, SVWA may recommend SpiderRock Advisors (“SpiderRock”) as a sub-advisor to actively manage a portion of such clients’ assets. SVWA evaluated a variety of information about SpiderRock, including public disclosure documents, materials supplied by SpiderRock and other third-party information it believes is reliable. The specific terms and conditions under which a client engages SpiderRock will be set forth in a separate written agreement between the client and SpiderRock and the client will enter into an agreement with SpiderRock that sets forth the scope of the SpiderRock’s discretion. In addition to this Form ADV Part 2A, clients will also receive the written disclosure documents of the SpiderRock.

Under this arrangement, SVWA continues to provide services directly to the client by monitoring that the performance, strategies and allocations of SpiderRock remain aligned with clients’ investment objectives and overall best interests. Clients with assets managed by SpiderRock will incur fees payable directly to SpiderRock in addition to fees payable to SVWA. Fees charged by SpiderRock will be established in a client’s written agreement with SpiderRock.

We do not sponsor wrap fee programs or manage assets for any wrap fee accounts.

We do not act as the physical custodian of your assets. You always maintain asset control with your designated custodian. We place trades for you under a limited power of attorney that grants us the authority to determine, without obtaining your specific consent, the securities to be bought or sold.

## **Our Fees**

We base our fees on a percentage of assets under management, hourly charges, or fixed fees. Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has begun. The minimum annual fee is \$2,500. Our standard fee schedule for investment management services is as follows:

<b>Assets Under Management</b>	<b>Annual Fee</b>
\$0 to \$3,000,000	0.95%
\$3,000,001 to \$5,000,000	0.80%
\$5,000,001 to \$10,000,000	0.70%
Above \$10,000,000	0.50%

Services provided for the above fees are for investment advice and quarterly reporting of asset holdings, valuations and performance reviews. The client's investment management fee to the Firm is determined in accordance with the above standard fee structure, with exceptions negotiated on a case-by-case basis at our discretion. Any deviations from the fee structure are based on a number of factors including the nature and length of the client relationship, the services requested, account composition, the amount of work involved, the amount of assets placed under management and the attention needed to manage the account.

Our investment strategy generally does not encourage clients to use margin account trading. The decision as to whether to employ margin is left to the sole discretion of each client. To the extent that a client authorizes the use of margin, and margin is thereafter employed, the market value of the client's account and corresponding management fee payable to Advisor may be increased as any margin balance will not be offset against the value of assets purchased on margin when Advisor calculates its advisory fee.

Payment in full is expected upon invoice presentation. Fees are usually deducted from an account designated by you to facilitate billing. You must consent in advance to direct debiting of your investment account. We will send a statement to you (a) showing the amount of the fee, the value of your assets upon which the fee was based, and the specific manner in which the fee was calculated, (b) disclose to you that it is your responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated, and (c) send a bill to the custodian indicating only the amount of the fee to be paid by the custodian.

### **Account Minimums**

SVWA requires that prospective clients have a minimum of \$500,000 (which may be waived at our discretion) in investment assets exclusive of residence and personal property. Financial plans are prepared subject to a minimum fee of \$4,000 (for SVWA clients with more than \$3,000,000 in assets under management the fee is waived).

### **Financial Planning**

Depending on your needs and interests, we will provide advice in the form of a Financial Plan. The Financial Plan will assess the likelihood of your achieving various goals and objectives dependent on various personal and financial assumptions, including portfolio design, lifestyle, work and retirement plans, pursuit of charitable and/or family goals and normal savings and consumption behavior. Depending on your needs, the Plan may also address elements of tax planning, estate planning and insurance planning, including life, disability, health and long-term care insurance. However, the Firm does not undertake to provide comprehensive legal, tax or accounting services and does not sell insurance products.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement;

a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Implementation of the financial plan recommendations is at your discretion.

### **Our Fees for Financial Planning**

The fee for a financial plan is predicated upon the facts known at the start of the engagement. Since financial planning is a discovery process, situations occur wherein you are unaware of certain financial exposures or predicaments.

In the event that your situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. You must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to 12 months and lifetime if we manage your portfolio.

### **Management of Conflicts of Interest between Clients**

Our relationship with you is non-exclusive; in other words, we provide investment advisory services and financial planning services to multiple clients. We seek to avoid situations in which one client's interest conflicts with the interest of another of our clients. More information about this policy is found in your Client Agreement.

### **How Fees are Calculated**

Billing amounts are based upon the value (market value or fair market value in the absence of market value) of the client's account(s) (including both securities and cash) at the end of the previous quarter (or, for new clients, upon a date agreed to by us and you). Valuations are derived from recognized and independent pricing sources, such as Charles Schwab & Co. Institutional and TD Ameritrade Institutional.

### **Return of Unearned Fees upon Termination**

Should you terminate your engagement of our firm during a quarter, for any reason, the fee for such quarter is prorated and any pro rata unearned amount will be refunded.

### **Other Fees or Expenses Paid in Connection with Our Services**

All fees paid to us for investment advisory and financial planning services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. Mutual fund expenses are generally described in each fund's prospectus. These expenses will generally include a management fee, other fund expenses, and possibly a distribution fee. In addition, mutual funds incur transaction costs and opportunity costs, which are disclosed in the fund's prospectus or Statement of Additional Information, but which may be estimated.

You will incur transaction fees or commissions in connection with trading of certain non-stock/ETF purchase and sale transactions, i.e. certain mutual fund and bonds transactions (and/or principal mark-ups and mark-downs for principal trades), which are charged by the executing broker. Mutual fund transaction fees charged by our recommended custodians, primarily Charles

Schwab & Co. Institutional, Fidelity Institutional Asset Manager and TD Ameritrade Institutional, generally varies from \$0 to \$50 for each transactions. The transaction costs for stock and bond trades vary. Accordingly, you should review both the fees charged by the funds (including transaction and opportunity costs within funds which are not included in a fund's annual expense ratio), the transaction fees charged by the custodian, as well as the fees charged by us, to fully understand the total amount of fees and costs paid by you, in connection with any recommended transaction. For a discussion of our practice in recommending brokers (custodians) to you and negotiating brokerage fees on your behalf, please see Item 12.

You may also incur "account termination fees" upon the transfer of an account from one brokerage firm (custodian) to another. The range for these account termination fees is believed to range generally from \$0 to \$200 at present, but at times may be much higher. You should contact your custodians (brokerage firms, bank or trust company, etc.) to determine the amount of account termination fees which may be charged and deducted from your accounts for any existing accounts which may be transferred.

### **Comparable Services**

We believe that the charges and fees offered are competitive with alternative programs available through other firms offering a similar range of services; however, lower fees for comparable services could be available from other sources.

### **Management of Conflicts of Interest Relating to the Fees We Receive, and Receipt of Percentage-Based Compensation.**

The vast majority of our clients pay us fees based upon a percentage of the assets we advise upon. This is a very common form of compensation for registered investment advisory firms and avoids the multiple inherent conflicts of interest associated with commission-based compensation (we do not accept commission-based compensation of any nature, nor do we accept 12b-1 fees). Asset-advised-upon percentage method of compensation can still at times lead to conflicts of interest between our firm and you as to the advice we provide. For example, conflicts of interest often arise relating to the following financial decisions in life: incur or pay down debt; gift funds to charities or to individuals; purchases of a (larger) home or cars or other non-investment assets; the purchase of a lifetime immediate annuity; personal expenditures; investment in private equity investments, and the amount of funds to place in non-managed cash reserve accounts. We have adopted internal policies to properly manage these and other potential conflicts of interest. Our goal is that our advice to you remains at all times in your best interests, disregarding any impact of the decision upon our firm. Each time such a potential conflict arises, we will give you notice of the conflict in that given situation if our advice regarding the proposed transaction would impact our compensation

### **Our Services are Tailored to Meet Your Needs and Investment Restrictions.**

In general, our advisory services are tailored to meet your needs. While model portfolios may be utilized for some clients. For most clients each investment portfolio is individually designed. Additionally, financial planning, estate planning, tax planning, and risk management planning services are generally delivered upon your engaging us for such services. As appropriate you will have a conference with your advisor at least annually to review any changes to your financial situation, your investment portfolio, and planning issues.

After consultation with us, you may impose restrictions on investing in certain securities or types

of securities. This most often occurs when you request certain social investing needs be addressed, such as through the use of mutual funds which avoid investments in certain companies. Other restrictions may be imposed by you with respect to the (average or longest) maturity or credit quality of fixed income investments. Our Agreement with you may not be assigned without your consent.

## **Item 5: Fees and Compensation**

Please refer to the discussion about our fees under Item 4, above.

### **Cancellation and Termination of Agreements**

Upon termination of any account, any prepaid, unearned fees will be promptly refunded, with the refund calculations based pro rata to the date of termination. Termination of an agreement will not affect: (a) the validity of any action previously taken by us under the agreement; liabilities or obligations of the parties from transactions initiated before termination of the agreement; or your obligation to pay advisor fees (prorated through the date of termination). Upon the termination of the agreement, we will have no obligation to recommend or take any action with regard to the securities, cash, or other investments in your account.

## **Item 6: Performance Based Fees and Side-by-Side Management**

Our fees are not based on a share of the capital gains or capital appreciation of managed securities. We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation creates an incentive for the adviser to recommend an investment that could carry a higher degree of risk to you.

## **Item 7: Types of Clients**

We provide investment advice primarily to individuals and their families, including high net worth individuals, and trusts. We also provide investment advice to pension and profit-sharing plans and plan participants as well as foundations and other institutions, and to business entities.

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

### **Methods of Analysis**

We provide the investment strategy and its implementation for all clients, utilizing a variety of securities or pooled investment vehicles (such as mutual funds). Our clients receive the benefit of our developed investment philosophies and strategies, research and due diligence, account monitoring, and personal financial planning recommendations.

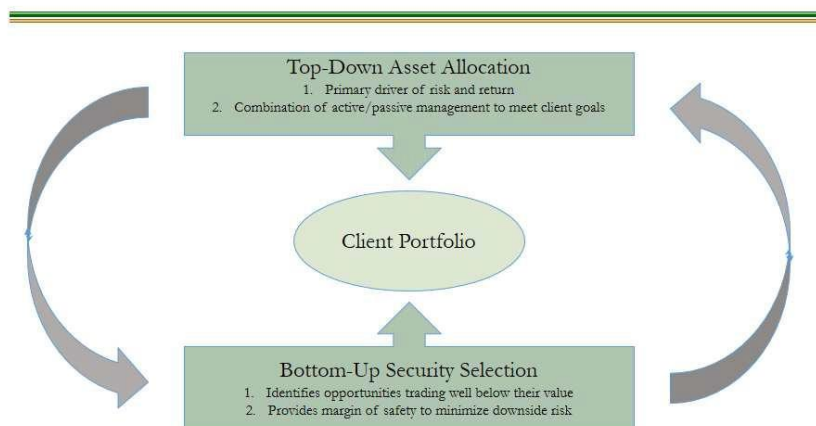
### **Investment Committee**

The Investment Committee members are Tracy Lasecke, Scott Yang and R. Scott Ponder, each of whom is a Certified Financial Planner®.

### Opportunistic Security Selection

This service is limited to clients that maintain a minimum account relationship of \$2 million with the Firm and that have requested ownership of individual securities. While our core approach is driven by top-down asset allocation management, our resources and research capabilities enable us to identify select securities that we believe to be mispriced relative to their current market value and opportunity. Our criteria for determining value combine comprehensive review of the company's financial position, product portfolio, and industry. When paired with our core top-down approach, we believe this can enhance returns without materially contributing to risk. Certain small capitalization companies will not exhibit all of the characteristics listed and represent additional risks.

### Top-Down Allocation/Bottoms-Up Selection



### **Our Security Selection Process Focuses on the Following:**

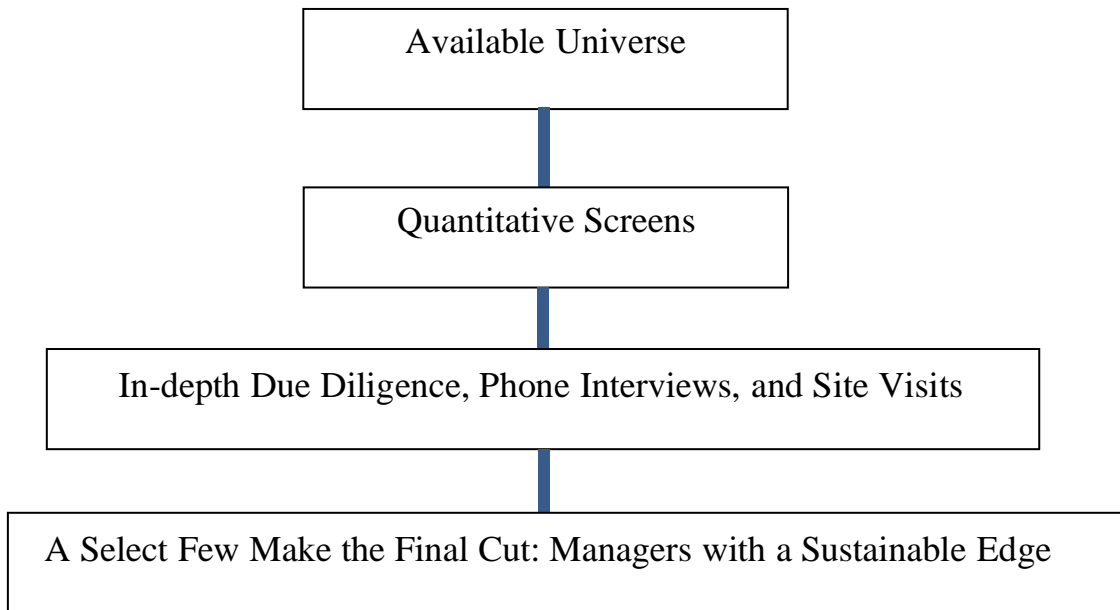
- Superior balance sheet – avoiding names with excessive leverage
- Compelling price multiples – e.g. Price/Book, Price/Earnings, Price/Cash Flow
- Product portfolio
- Industry positioning
- Identify what consensus is missing

### **How We Research**

- Formal Investment Committee
- Core and Explore Approach
- Specific Criteria for Active Managers
- Underweight/Overweight when appropriate

### **Selecting Money Managers**

<u>Quantitative Review</u>	<u>Qualitative Review</u>
<ul style="list-style-type: none"><li>– Manager Records</li><li>– Return vs. Peer Group</li><li>– Consistency</li><li>– Expenses</li></ul>	<ul style="list-style-type: none"><li>– Disciplined Approach</li><li>– Obsessive in Seeking an Edge</li><li>– Team Focus</li><li>– Stability &amp; Culture</li><li>– Quality Team</li><li>– Shareholder Orientation</li></ul>



### Personalized Portfolio Management

- Match investment strategy to goals and values.
- Alternatives to risk/reward objectives
- Conservative to Aggressive Strategies
- Core holdings mostly indexed instruments.
- Carefully selected actively managed mutual funds added
- Carefully selected sub-advisors to advance client investment goals and objectives
- Can include Environmental, Social, and Governance (ESG)
- Screen for good social records: products or services have immediate, positive impact on society's major challenges.
- Respect individual needs

Based upon the client's financial condition, personal goals, investment preferences, risk profile, time horizons, and other applicable factors as listed above, we tailor an investment approach appropriate for each client which sets forth a recommended strategic asset allocation. Expansive academic research, investment information, and certain proprietary analyses are drawn upon by us, in order to provide innovative investment advisory services customized to each client's needs.

Client portfolios are then periodically monitored, and changes to investment portfolios are suggested when appropriate. A disciplined approach to rebalancing is employed in order to maintain asset class exposures within desired risk tolerances, subject to reduction, tax planning or other reasons.

This information becomes the basis for the strategic asset allocation plan which we believe will best meet your stated long term personal financial goals. The strategic asset allocation provides for investments in those asset classes which we believe (based on historical data and our analysis) will possess attractive combinations of return, risk, and correlation over the long term.

A tremendous amount of academic research reveals that strategic asset allocation is determinative of the majority of the long-term gross returns of investor's portfolios. Our selection of asset classes is driven by research into global asset classes by such academics as Professor Eugene Fama, Sr. of the University of Chicago, Booth Graduate School of Business and the Center for Research in Security Prices, Professor Kenneth French of Dartmouth College, and many other academics and researchers.

The investment advice which we provide is based upon long-term investment strategies which incorporate the principles of Modern Portfolio Theory. The utilization of several different asset classes as part of an investor's portfolio is emphasized, as this has been shown to usually effect a reduction in portfolio volatility (i.e., the standard deviation of the portfolio returns) over long periods of time. We allocate and diversify client assets among various asset classes and then among individual investments, following the investment approach and asset allocation established for each client.

Our investment approach is firmly rooted in the belief that markets are fairly efficient (although not always rational) and that investors' gross returns are determined principally by asset allocation decisions. A focus is provided on developing and implementing globally diversified portfolios, principally through the use of low-cost and tax-efficient passively managed stock mutual funds and exchange traded funds (ETFs).

A client's investment approach and overall portfolio weightings as between equities and fixed income investments are based upon each client's needs and desires, perceived risk tolerance and the need to assume various risks, and investment time horizon. The client's portfolio may then follow models designed by us to fit the overall weightings of equities (stocks, stock mutual funds, etc.) and fixed income investments (notes, bonds, bond funds, CDs, etc.) in the client's portfolio. For other clients, the investment portfolio's strategic asset class allocation is customized to meet the specific circumstances of a client, the presence of investments in 401(k) or other accounts, as well as a perception of the client's understanding of the fundamental forces affecting risk and return in the capital markets

In addition, an initial or revised strategic asset allocation will be influenced by a review of the relative valuation levels of various asset classes and the investment time horizon of that client. While asset class "bubbles" are attempted to be discerned when they occur, tactical asset allocation strategies are not generally employed in connection with the management of the portfolio.

In certain cases, and where appropriate to a client's overall investment position, we may advise the selection of a sub-advisor whose investment strategy would advance the client's investment objectives to manage a portion of the client's portfolio. . . .

### **Methods of Analysis; Sources of Information**

Our security analysis is based upon a number of factors including those derived from commercially available software technology; securities rating services; general economic and market and financial information; due diligence reviews; and specific investment analyses that clients may request. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, academic white papers and periodicals. Prospectuses, statements of additional information, other issuer- prepared

information, and data aggregation services are also utilized. Including but not limited to Morningstar, Zacks, and Ycharts.

### **Types of Investments**

Assets are invested in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, Unit Investment Trusts, options contracts, futures contracts, and interests in partnerships.

For clients with a substantial fixed income allocation, we generally recommend a combination of bond funds and individual fixed income investments, with recommended actual investments dependent upon our view of the risk/return relationship for various forms of fixed income investments or bond funds. We will typically request discretionary authority from you to manage individual fixed income assets, as such may be necessary to enable us to purchase or sell such assets in a timely manner at quoted prices.

**Options Trading/Writing** – A securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the expiration of the option regardless of the market value of the security at expiration of the option. The seller of an uncovered call or put option assumes the risk of increases or decreases, respectively, in the market price of the underlying option with respect to the exercise price of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option. The buyer of a call or put option assumes the risk of losing the entire investment in the price of the option.

**Alternative Investments.** We occasionally recommend that certain clients for whom the investment is suitable and for which the client constitutes a qualified investor when required, invest in one or more alternative investments, including hedge funds, publicly traded real estate investment trusts (REITS), commodities index or passive mutual funds or ETFs, private equities, Delaware Statutory Trust, and/or commercial mortgage pools.

Insurance products such as annuities and various types of life insurance products may also be evaluated. Recommendations may be made for you to invest in low-cost, no-load (no commission) variable or fixed deferred or immediate annuities when appropriate to your circumstances and tax situation.

A client's existing investments are evaluated in light of the desired investment objectives. We work with you to develop a plan to transition from your existing portfolio to the desired portfolio. Investment advice may be offered on any investments held by you at the start of the advisory relationship. Your portfolio holdings and strategic asset allocation are then monitored periodically, taking into account your cash flow needs. Review meetings with you are held regarding your investment assets under management and other personal financial planning issues.

### **Risk of Loss, Generally**

Investing in securities involves a risk of loss that you should be prepared to bear. The investment

recommendations seek to limit risk through broad global diversification in equities (through broadly diversified stock mutual funds and/or separate account management programs) and investment in high quality fixed income securities or diversified bond funds.

However, the investment methodology will still subject you to declines in the value of your portfolios which can at times be dramatic. We believe there exists a high probability in most market environments of a long-term (15-year or greater) outperformance of small cap and value stocks, relative to large cap and growth stocks, and hence the stock (equities) portion of your portfolio will likely be “tilted” toward small cap and value stocks. Accordingly, the normally greater expected returns of the equity portion of the portfolio will in turn often permit the overall allocation to equities (stocks, stock mutual funds) to be reduced, and the allocation to fixed income investments increased. We believe this is the best manner to temper the shorter-term volatility of the stock market, especially, for clients who derive cash flow from their portfolios (such as clients who are in retirement years).

Given the long-term nature of the expected equity premium (i.e., the additional expected return for investing in the overall stock market, relative to less “risky” U.S. Treasury bills), and the long-term nature of the expected value and small cap effects, our investment philosophy is best suited for investors who desire a buy and hold strategy for a substantial portion of their funds. Even then, investing is inherently uncertain as to future returns. While both macroeconomic and microeconomic risks are evaluated, for purposes of weighing risks and returns and for the computation of the expected returns of various asset classes (for use in financial planning decision-making), we do not generally engage in market-timing activities.

We believe the equity, value and small cap effects are highly likely to occur in the future, over long periods of time. However, there can be no assurance that these effects will occur over any given time period. While we seek to reduce exposure to non-compensated risks, other risks (including but not limited to the risk of a general stock market decline) are likely to be assumed in order to seek to attain the client’s longer-term financial goals and objectives; however, we cannot provide any guarantee that the client’s goals and objectives will be achieved.

Please also note that while all Certificates of Deposit (CDs) purchased for you are FDIC- insured, the pricing of certain of these CDs, which trade in the secondary market, can vary; accordingly, due to price declines and/or transaction costs associated with trading, these CDs could lose value if redeemed prior to maturity. When CDs are recommended to you, it is our intent that you hold the CDs to maturity.

### **Risk of Loss, Certain Higher-Risk Securities**

Certain securities recommended, such as U.S. small cap value and mid cap value stock mutual funds, U.S. small cap and micro-cap mutual funds, hedge funds and similar pooled investment vehicles inside variable annuities, possess higher levels of volatility (as individual asset classes within a portfolio). We may employ these securities as part of an overall strategic asset allocation, and when such is undertaken we possess a reasonable belief that the risk-return relationship for these securities will likely be beneficial you over the long term.

### **Risks Related to REITS**

Traded Real Estate Investment Trusts (“REITs”) are companies that own and operate income-producing real estate or related assets. Because REITS are traded publicly, on national

securities exchanges, they are subject to the same general risks as those of stock trading such as market risk and income risk. In addition, investments in REITS may involve:

**Concentration risk** - the value of a REIT is derived from one or only a few properties;

**Liquidity risk** - a REIT will be relatively less liquid compared to funds investing in financial securities such as stocks and bonds; **Leverage risk** - if a REIT uses debt to finance the acquisition of underlying properties, the assets of the REIT will be used to pay off debtors first; and **Refinancing risk** - higher refinancing cost or stricter underwriting standards when loans are due for renewal.

### Alternative Investments - Potential risks

**Alternative Assets.** Many alternative investments are illiquid, having “lock-up” periods or only set intervals in which client redemptions may be made which render the investments sometimes more difficult to trade. Consequently, such holdings would limit a client's ability to dispose of such investments in a timely manner and at an advantageous price. Furthermore, depending upon the asset itself and its holdings, there may be no readily available market value for the asset potentially affecting the valuation at redemption.

**IPOs.** Are generally investments in companies with limited operational histories and non-existent or weak earnings and are highly subject to market sentiment. Shares purchased through an IPO can often trade down immediately from their offer price or can be subject to wild fluctuations in performance at certain time periods after their entry to the public markets and, as such, carry increased risks of investment loss.

**Private Equities.** We may purchase or recommend the inclusion of shares in non-publicly traded equities in the accounts of accredited clients. These companies will generally have little available information on their financial status, capital structure or revenues, resulting in increased risk of loss, including total loss. In addition, these securities are sometimes highly illiquid or experience losses of liquidity – resulting in an inability to sell said equities or sales prices that are substantially below the purchase or market price. Unless otherwise expressly agreed, we will value these positions at their purchase price for any accounting purposes, which may not reflect losses that would be realized if the position was sold. Of particular risk is that the Firm will likely base its account values for billing purposes on these positions’ purchase price (unless another methodology is agreed upon with the client), leading to a potential motivation to overvalue said equities. Finally, we have clients who are executives of said firms or have other financial relationships that create conflicts of interest. Where such conflicts exist, the Firm will disclose these conflicts in written format to the clients who hold such securities or whom we intend to purchase such securities under our discretion prior to any transactions.

### Use of Margin

**Margin Trading.** In some cases, and generally only for short term financing considerations, clients may elect to assume a margin balance on their investment account. The client’s custodian may require a percentage of assets under management to be pledged as collateral for the margin amount. Clients risk that in a falling market, the pledged collateral will be insufficient to cover a margin call by their custodian. Consequently, all margin decisions are left to the client.

### **Cash Balances in Client Accounts**

Cash in your investment accounts are typically swept into the bank or money market mutual fund accounts of the institutions by the custodian, either TD Ameritrade, Member FINRA/SIPC/NFA, Fidelity Brokerage Services, LLC, Member FINRA/SIPC/NFA, or Charles Schwab & Co., Inc.. Member FINRA/SIPC/NFA. We discuss with you, during the time of review conferences and at other times, upcoming cash flow needs and seek to plan accordingly to meet those needs. While it is not the practice to encourage you to maintain a large amount of cash in your accounts, such may be undertaken at your request, to facilitate our billing of periodic fees, or for other reasons. Upon your request, cash balances will be maintained for temporary or short-term purposes.

Should you desire a “cash reserve account,” we will assist you to establish a separate, non-managed cash reserve account, which is not monitored thereafter by us. We then seek to review with you, during periodic conferences, whether any funds are needed to restore cash reserves. We exclude separate accounts established for cash reserve purposes from our fee calculations.

### **Item 9: Disciplinary Information**

SVWA has no disciplinary history and consequently, is not subject to any disciplinary disclosures.

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

#### **Financial Industry Activities**

Senior Wealth Manager R. Scott Ponder, holds an insurance agency license issued by the State of California. Although licensed to do so, Mr. Ponder and the Firm do not sell insurance products to clients of SVWA.

We are not involved in any other financial industry activities.

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

We seek to avoid material conflicts of interest. Accordingly, neither we nor its investment adviser representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

Although we believe that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to manage appropriate any material conflicts of interest that may remain, you should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Please refer to the additional discussion under Item 12 Brokerage Practices.

#### **Our Code of Ethics**

We have adopted a Code of Ethics, to which all investment advisor representatives and employees

are bound to adhere. The key components of our Code of Ethics states:

We and our investment advisor representatives and employees shall always:

- Act in the best interests of each and every client;
- Act with integrity and dignity when dealing with clients, prospects, team members, and others;
- Strive to maintain and continually enhance our high degree of professional education regarding Modern Portfolio Theory, strategic asset allocation, and financial, tax, estate, and risk management planning; and
- Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

We further adopted a detailed Code of Ethics expressing our commitment to ethical conduct, which is adopted by reference by us, and which is utilized to guide the personal conduct of our various team members. This detailed Code of Ethics describes our fiduciary duties and responsibilities to you and sets forth our practice of supervising the personal securities transactions of employees with prior or concurrent access to client trade information.

A copy of the Code of Ethics is available to you and prospects upon request.

### **Participation or Interest in Client Transactions and Personal Trading**

Our Code of Ethics provides that individuals associated with our firm are permitted to buy or sell securities for their personal accounts identical or different than those recommended to you. However, it is the expressed policy of our firm that no person employed by the firm shall prefer his or her own interest to yours nor make personal investment decisions based on your investment decisions.

To supervise compliance with the Code of Ethics, we require that anyone associated with this advisory practice and who possesses access to advisory recommendations (before or at the time they are entered into) (“access persons”) to provide annual securities holding reports and quarterly transaction reports to our Chief Compliance Officer or his or her designee. We also require access persons to receive advance approval from our Chief Compliance Officer or his designee prior to investing in any initial public offerings or private placements, and with regard to trading of certain individual securities.

The Code of Ethics further includes our policy prohibiting the use of material non-public information and protecting the confidentiality of client information. We require 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 will be subject to discipline.

## **Item 12: Brokerage Practices**

### **Recommendation of Custodians And Executing Brokers**

SVWA recommends that clients establish brokerage accounts with TD Ameritrade Institutional, Division of TD Ameritrade (“TD”), Fidelity Brokerage Services (“Fidelity”), or Charles Schwab

Institutional division of Charles Schwab (“Schwab”) (sometimes, collectively the “Custodians”) to maintain custody of their investment assets and to effect trades for their accounts. TD, Fidelity and Schwab are independently owned and operated and not affiliated with SVWA and do not supervise or otherwise monitor SVWA’S investment management services to its clients. The Custodians provide SVWA with access to their institutional trading and custody services, which typically are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a set minimum of the advisor’s clients’ assets is maintained in accounts at the Custodian but are not otherwise contingent upon SVWA committing to any specific amount of business (in the form of either assets in custody or trading). The Custodians’ services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

The Custodians also make available to SVWA other products and services that benefit SVWA but may not directly benefit each or any of clients. Some of these other products and services assist SVWA in managing and administering clients’ accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of SVWA’S fees from its clients’ accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of SVWA’S accounts, including accounts not maintained at the Custodians. The Custodians also make available to SVWA other services intended to help SVWA manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, the Custodians may make available, arrange and/or pay for these types of services to SVWA by independent third parties. The Custodians may discount or waive fees it otherwise would charge for some of these services or pay all or a part of the fees of a third-party providing these services to SVWA.

SVWA’S recommendation that clients maintain their assets in accounts at one of the Custodians is based in part on the benefit to SVWA of the availability of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by them.

### **Best Execution**

SVWA is not obligated to obtain the best net price or lowest brokerage commission on any particular transaction. Rather federal law requires investment managers to use their reasonable best efforts to obtain the most favorable execution for each transaction executed on behalf of client accounts.

In selecting broker-dealers, SVWA’S primary objective is to obtain the best execution. Expected price, giving effect to brokerage commissions, if any, and other transaction costs, are principal factors, but the selection also takes account of other factors, including the execution, clearance and settlement capabilities of the broker-dealer, the broker-dealer’s willingness to commit capital, the broker-dealer’s reliability and financial stability, the size of the particular transaction and its complexity in terms of execution and settlement, the market for the security, the value of any research and other brokerage services provided by the broker-dealer, and the cost incurred by placing prime brokerage trades in client accounts.

Based upon an evaluation of some or all of these factors, SVWA may execute client trades through broker-dealers that charge fees that are higher than the lowest available fees. SVWA may select broker-dealers whose fees may be greater than those charged for similar investments if SVWA determines that brokerage services and research materials provided by that broker-dealer warrant the payment of higher fees.

SVWA reviews transaction results periodically to determine the quality of execution provided by the various broker-dealers through whom SVWA executes transactions on behalf of clients.

### **Soft Dollar Arrangements**

SVWA is not a party to formal agreements whereby, in exchange for directing commissionable trades to a broker-dealer, it receives research or brokerage services, known as “soft dollar” services and research. “Soft dollars” refers to the use of brokerage commissions on client trades to pay for the soft dollar research or brokerage services received. Soft dollar research and services may include among others, economic and market information, portfolio strategy advice, proxy voting services, industry and company comments, technical data, recommendations, research conferences, general reports, periodical subscription fees, consultations, performance measurement data, on-line pricing, news wire charges, quotation services, computer hardware and software.

Although SVWA does not formally participate in soft dollar arrangements, it receives certain services and research from one or more of the Custodians by virtue of having its clients custody their assets with the Custodians. In such cases, it is the Firm’s policy is to limit its use of soft dollar arrangements to those falling within the safe harbor of Section 28(e) of the Securities and Exchange Act of 1934, as amended. Only *bona fide* research and brokerage products and services that provide assistance to SVWA in the performance of its investment decision-making responsibilities are permitted.

SVWA on occasion, receives discounts on software and other services from one or more of the Custodians. The discounts are generally offered to all firms who fit a common profile or asset threshold. Such discounts are accepted with the intent to benefit all clients and the value of these discounts is not considered in the process of selecting securities to purchase for client accounts. SVWA routinely reviews the amount and nature of the research products and services provided by brokers.

### **Aggregation of Trades And Potential Conflicts**

SVWA aggregates client orders into a single trade if aggregation appears to be in the best interests of all the clients involved. Trade aggregation results in a more favorable transaction price than would result with separate execution of each client order. The Firm does not aggregate securities transactions for client accounts unless it believes that aggregation is consistent with its duty to seek best execution and is consistent with the investment objectives and guidelines for the client accounts participating in the trade.

SVWA believes that combining trade orders should be advantageous to all clients over the long term. However, it is possible that the average price obtained through aggregation could be less advantageous for a client than if the client had executed the transaction separately and/or had executed the transaction before the other parties to the aggregated trade. The Firm tries to be conscious of this possibility before deciding to aggregate.

When orders are aggregated, the price paid by each account is the average price of the order. Transaction costs are allocated to each client by the client's custodian according to the client's custodial agreement. It is our policy that trades are not allocated in any manner that favors one group of clients over another over time. Client transactions may be aggregated according to custodial relationship in consideration of "trade away" charges that may be imposed if trades are directed to a non-custodial broker-dealer for execution. Aggregated trades placed with different executing brokers may be priced differently.

Generally, SVWA and/or its associated persons may participate in such aggregated orders. There may be circumstances in which transactions on behalf of SVWA or its associated persons may not, under certain laws and regulations, be combined with those of some of SVWA'S clients and in those cases, employees will not effect transactions in that security on the same day as clients until after the clients' transactions have been executed.

### **Allocation of Opportunities And Potential Conflicts**

Because we manage more than one client account, there may be a conflict of interest related to the allocation of investment opportunities among all accounts managed by the Firm. We attempt to resolve all such conflicts in a manner that is generally fair to all of clients over time. We may give advice and take action with respect to any of our clients that may differ from advice given or the timing or nature of action taken with respect to any other client based upon individual client circumstances. It is our policy, to the greatest extent practicable, to allocate investment opportunities over a period of time on a fair and equitable basis relative to all clients. The Firm is not obligated to acquire for any client account any security that the Firm or its owners, officers, employees or affiliated persons may acquire for their own accounts or for the account of any other client, if in the discretion of the portfolio managers, based upon the client's financial condition and investment objectives and guidelines, it is not practical or desirable to acquire a position in such security for that account.

### **Use of Third-Party Trade Data Management Services**

The Firm is aided in its ongoing client account monitoring and management services by the use of third-party portfolio and trade data management software and services provided by Schwab Portfolio Center, Fidelity WealthCentral and Orion. Such third-party services provide linked access to client custodial accounts and trade activity and provide "cloud" storage of such data on their secure, internal computer servers on behalf of the Firm. We only store non-public client information on non-affiliated third-party platforms when we believe it necessary for our provision of services to you or to maintain your account.

## **Item 13: Review of Accounts**

Client's investments are reviewed at the inception of the client relationship, and thereafter as often as is mutually agreed between us and the Client based on the Client's stated objectives.

Portfolio Reviews and Rebalancing of your portfolio, for the assets held under management with us will be undertaken: (1) periodically; (2) upon request, and (3) upon a substantial asset class decline, under the following adopted policies and procedures.

Periodic Portfolio Reviews are undertaken by the Firm's Wealth Managers to ascertain if the

values in any asset class have strayed beyond their target minimums or maximums, and for purposes of meeting your cash flow needs. Even if one or more asset classes fall outside their target minimums or maximums, we may determine not to rebalance the asset class for various reasons, such as avoidance of short-term capital gains, deferring long-term capital gains realization, minimization of transaction costs, or our view on whether the asset class is undervalued or overvalued relative to historic norms and our view of the level of the macroeconomic risks to which the asset class may be exposed.

Additional Portfolio Reviews are undertaken upon your request, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. We will respond to such requests within a reasonable period of time.

We may also undertake sales and purchases during this time to effect tax loss harvesting, in addition to rebalancing actions.

In undertaking rebalancing actions, we will seek to rebalance one or more asset classes closer to the targets. We may decline to rebalance a specific asset class, due to tax concerns, high transaction costs relative to the trade amount, or other reasons.

### **Regular Reports**

Quarterly Reports from us of your investment portfolio, including a consolidated inventory of the investments upon which advice is provided to you. Such reports also include a performance report of your portfolio. In addition, in January or February of each calendar year, you may be provided with a realized gains and loss report for any taxable accounts which are under management to aid your CPA/accountant/tax preparer in income tax preparation.

We may also offer periodic data for other investment accounts upon which we provide advice, not held at the foregoing custodians, if such information can be obtained from our account aggregation services, and provided your consent is obtained to furnish such account aggregation information with any account passwords required to access account information.

While we are hopeful that the information supplied by custodians and data aggregation services is reliable, we cannot guarantee its accuracy.

Clients may also directly access account information at the custodians with which the accounts are held online (TD Ameritrade Institutional and Charles Schwab & Co. Institutional), each and every business day, via the secure web sites of these institutions.

Monthly or Quarterly Statements Directly from Account Custodians are sent to you directly from the corresponding brokers, banks, mutual funds, partnership sponsors, and/or insurance companies which hold your investments. These statements reflect the assets in the custodian's custody, together with confirmations of each transaction executed in the account(s) if desired by you. For some custodians, you may elect to receive these statements by e-mail rather than U.S. mail.

You are strongly encouraged to review the monthly or quarterly statements you receive from custodians. Despite the best efforts of any firm to safeguard client's assets, fraud could still occur. While we hope that you trust our firm and advisors, and we have never had an instance of theft of client funds, it is nevertheless important for you to verify your investment holdings.

## **Item 14: Payment for Client Referrals**

### **Incoming Referrals**

The firm does not currently compensate referring parties for new client referrals.

### **Referrals Out**

We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Item 15: Custody**

SVWA does not maintain physical custody of client funds or securities. Clients are required to set up their investment accounts with a “qualified custodian,” namely a broker dealer, bank or trust company. SVWA is unable to take even temporary possession of client assets for the purpose of transferring them to the client’s account. Each client has a direct relationship with their custodian and is responsible for making deposits to and withdrawals from their account as necessary.

Although SVWA does not maintain physical custody of client investment accounts, it is deemed to have custody of client assets on the basis of the Firm’s authority to: 1. direct client-approved transfers of assets between a client’s own accounts and if authorized, to client-designated third party accounts; and 2. to receive payment of its investment management fees via direct payment by the client’s custodian from the client’s investment account.

Occasionally, clients authorize us to log onto and implement portfolio changes to certain client retirement accounts. In these instances, we are deemed to have custody client assets and are required to have these retirement accounts audited on an annual basis. In compliance with this requirement, we have retained the services of Frank Rimerman, LLP, a PCAOB registered and regulated auditing firm, to perform a surprise audit of those accounts on an annual basis.

However, with your consent, we will be provided with the authority to seek deduction of our fees from your accounts; this process generally is more efficient for both you and us, and there could be tax benefits for you to this method when fees can be paid from certain tax- deferred accounts of clients.

## **Item 16: Investment Discretion**

Clients appoint SVWA as their investment advisor and grant full trading and investment authority over their assets at the time they establish their investment accounts. Subject to the Firm’s investment strategy and the client’s investment objectives, our portfolio managers are given full discretion to determine:

- Types of investments;
- Which securities to buy;
- Which securities to sell;
- The timing of any buys or sells;
- The amount of securities to buy or sell; and
- The broker-dealer to be used in the transaction

This discretion may be limited by client investment guidelines and by any investment restrictions set by the client. Each client approves the custodian to be used and the commission rates paid. We do not receive any of the transaction fees or commissions a client pays to their custodian.

On occasion the Firm may accept a portion of a client's investment assets on a non-discretionary basis. In these instances, our portfolio manager will make recommendations to the client regarding types of investments to buy and sell, the timing and amount of such transactions and where applicable, the executing broker-dealer to effect the transactions. The decision to implement or reject the portfolio manager's recommendations remains with the client and transactions will be entered only after specific client authorization.

## **Item 17: Voting Client Securities**

As a matter of firm policy and practice, we do not accept authority to vote proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. Generally, you will receive their proxies or other solicitations directly from the custodian or transfer agent. However, you may call or e-mail us with questions regarding a particular proxy or other solicitation, and we may provide advice to you regarding your voting of proxies or such solicitations, upon your request.

You should note that we will not advise nor act on your behalf in legal proceedings involving companies whose securities are held or previously were held in your account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, you may direct us to transmit copies of class action notices to you or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18: Financial Information**

We do not require prepayment of more than \$1,200 in investment management fees, six months or more in advance.

We accept limited forms of discretion over your accounts, as described in Item 16 of this Brochure. Due to this acceptance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. We currently possess no such financial condition and have never been the subject of a bankruptcy proceeding.

## **Additional Information**

### **Business Continuity Plan General**

We have a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers natural and manmade disasters. Electronic files are backed up and archived offsite.

An alternate office has been identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact you within five days of a disaster that dictates moving

our office to an alternate location.

### **Information Security Program**

We maintain an information security program to reduce the risk that your personal and confidential information may be breached. We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

### **Privacy Notice**

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The nonpublic information we collect from you includes information about your finances and about transactions between you and third parties, personal information that it is needed for the financial planning process, and data from consumer reporting agencies. We use this information to help you meet your personal financial goals.

We will disclose limited information to your authorized attorneys, accountants, and mortgage lenders with your authorization. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf. We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our records and your personal data as required by law.

Personally identifiable information about you is maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, the information will be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver our Privacy Policy to you annually, in writing.



## **Form ADV Part 2B**

### **Brochure Supplement**

This brochure supplement provides information about Tracy Lasecke, CFP®, Scott Yang, CFP® and R. Scott Ponder, MBA, CFP® that supplements the Silicon Valley Wealth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact us if you did not receive Silicon Valley Wealth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Tracy Lasecke, CFP®, Scott Yang, CFP® and R. Scott Ponder, MBA, CFP® is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



**Tracy Lasecke, CFP®**  
Born: 1957

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

### **Educational Background:**

San Jose State University, 1978 - 1980

### **Professional Designations and Exams:**

Admitted to the Registry of CFP Licensed Practitioners in 2003

Certificate in Personal Financial Planning from the University of California, Santa Cruz, 2001

### **Business Experience:**

- Silicon Valley Wealth Advisors, LLC; 2005 to present; Managing Member, Chief Executive Officer, Chief Investment Officer, Chief Compliance Officer, Senior Wealth Manager
- Weil Capital Management, 2000-2005; Senior Portfolio Manager
- Bank of the West, 1998-2000; Sales/Trust Officer

## **Item 3. Disciplinary Information**

We invite you to visit <https://www.adviserinfo.sec.gov/> for a free and simple search tool to research our Firm and our financial professionals.

## **Item 4. Other Business Activities**

None

## **Item 5. Additional Compensation**

None

## **Item 6. Supervision**

Tracy Lasecke, Managing Member, Chief Executive Officer and Chief Compliance Officer is primarily responsible for all investment management services provided to clients. Mr. Lasecke is joined in certain of his supervisory responsibilities by Mr. R. Scott Ponder, Member and Senior Wealth Advisor. Mr. Lasecke's and Mr. Ponder's supervision is ongoing and includes account reviews, trade supervision, annual compliance reviews including the forensic testing of Firm systems, staff meetings and employee reviews. All Firm personnel are bound by our Firm's Code of Ethics. Contact information: Tracy Lasecke ([tracy@svwadvisors.com](mailto:tracy@svwadvisors.com)); 408-688-0888.

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**Scott Yang, CFP®**

Born: 1965

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

### **Educational Background:**

San Jose State University; 1989; BA

### **Professional Designations and Exams:**

Admitted to the Registry of CFP Licensed Practitioners in 2006

Certificate in Personal Financial Planning from the University of California, Santa Cruz, 2001

### **Business Experience:**

- Silicon Valley Wealth Advisors, LLC, 2005 to present; Planning/Investment Research Manager
- Sun Microsystems, 2000-2004; Senior Financial Analyst

## **Item 3. Disciplinary Information**

We invite you to visit <https://www.adviserinfo.sec.gov/> for a free and simple search tool to research our Firm and our financial professionals.

## **Item 4. Other Business Activities**

None

## **Item 5. Additional Compensation**

None

## **Item 6. Supervision**

Tracy Lasecke, Managing Member, Chief Executive Officer and Chief Compliance Officer is primarily responsible for all investment management services provided to clients. Mr. Lasecke is joined in certain of his supervisory responsibilities by Mr. R. Scott Ponder, Member and Senior Wealth Advisor. Mr. Lasecke's and Mr. Ponder's supervision is ongoing and includes account reviews, trade supervision, annual compliance reviews including the forensic testing of Firm systems, staff meetings and employee reviews. All Firm personnel are bound by our Firm's Code of Ethics. Contact information: Tracy Lasecke ([tracy@svwadvisors.com](mailto:tracy@svwadvisors.com)); 408-688-0888.

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**R. Scott Ponder, MBA, CFP®**

Born: 1959

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

### **Educational Background:**

Oklahoma City University, BA General Business; 1981

Golden Gate University, MBA Finance, 1985

### **Professional Designations and Exams:**

Admitted to the Registry of CFP Licensed Practitioners in 1992.

### **Business Experience:**

- Silicon Valley Wealth Advisors, LLC; 2019 to present; Member, Senior Wealth Manager
- Ponder Financial Group, 1990 to 2019; Founder, President, Investment Advisor

## **Item 3. Disciplinary Information**

We invite you to visit <https://www.adviserinfo.sec.gov/> for a free and simple search tool to research our Firm and our financial professionals.

## **Item 4. Other Business Activities**

Scott Ponder is licensed as an insurance agent. He is not actively selling new policies but rather retains his license solely to service policies previously issued to existing clients. Mr. Ponder does not receive outside compensation for these services. Mr. Ponder also serves as a consulting wine maker, under the name of Blue Run Cellars. Wines are produced at a licensed winery.

## **Item 5. Additional Compensation**

None

## **Item 6. Supervision**

Tracy Lasecke, Managing Member, Chief Executive Officer and Chief Compliance Officer is primarily responsible for all investment management services provided to clients. Mr. Lasecke is joined in certain of his supervisory responsibilities by Mr. R. Scott Ponder, Member and Senior Wealth Advisor. Mr. Lasecke's and Mr. Ponder's supervision is ongoing and includes account reviews, trade supervision, annual compliance reviews including the forensic testing of Firm systems, staff meetings and employee reviews. All Firm personnel are bound by our Firm's Code of Ethics.

Contact information: Tracy Lasecke ([tracy@svwadvisors.com](mailto:tracy@svwadvisors.com)); 408-688-0888.

## **Education and Business Standards**

General standards, which we expect of persons associated with us, are an undergraduate degree and/or previous employment experience in the areas of securities, estate planning, taxes, or financial counseling.

## **Professional Certifications**

The Certified Financial Planner™ (“CFP®”) designation requires the holder to meet education, examination, experience and ethics requirements, and pay an ongoing certification fee. A bachelor's degree (or higher), or its equivalent in any discipline, from an accredited college or university is required. Students are required to complete course training in nine core financial topic areas, sit for a 10-hour CFP Board Certification Examination, acquire three years full-time or equivalent (2,000 hours per year) part-time work experience in the financial planning field and undergo an extensive background check—including an ethics, character and criminal check. To maintain the CFP certification, CFP® professionals must complete 30 hours of continuing education (CE) accepted by CFP Board (including completion of 2 hours of CFP Board approved Ethics CE).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold the CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.