

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

**Wolfstich Capital, LLC**

**Office Address:**

445 Main Street, Suite 303  
Medfield, MA 02052

Tel: 781-475-6157

[ted@wolfstichcapital.com](mailto:ted@wolfstichcapital.com)

**Website:**

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

This brochure provides information about the qualifications and business practices of Wolfstich Capital, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 508-242-9400. 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 Wolfstich Capital, LLC (CRD #146026) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**October 30, 2023**

## **Item 2: Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

Since the last filing of this brochure on April 13, 2023, the following changes have been made:

- Document updated to reflect new business phone number.
- Document updated to reflect the removal of financial planning as a service offered by the Firm.

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

### Form ADV – Part 2A – Firm Brochure

#### Item 1: Cover Page

#### Item 2: Material Changes ..... ii

Annual Update..... ii

Material Changes since the Last Update ..... ii

Full Brochure Available ..... ii

#### Item 3: Table of Contents ..... iii

#### Item 4: Advisory Business ..... 1

Firm Description..... 1

Types of Advisory Services ..... 1

Client Tailored Services and Client Imposed Restrictions..... 2

Wrap Fee Programs ..... 2

Client Assets under Management..... 2

#### Item 5: Fees and Compensation..... 2

Method of Compensation and Fee Schedule ..... 2

Client Payment of Fees..... 3

Additional Client Fees Charged ..... 3

Prepayment of Client Fees..... 3

External Compensation for the Sale of Securities to Clients..... 4

#### Item 6: Performance-Based Fees and Side-by-Side Management..... 4

Sharing of Capital Gains..... 4

#### Item 7: Types of Clients ..... 4

Description..... 4

Account Minimums..... 4

#### Item 8: Methods of Analysis, Investment Strategies and Risk of Loss..... 4

Methods of Analysis ..... 4

Investment Strategy..... 4

Security Specific Material Risks..... 5

#### Item 9: Disciplinary Information ..... 7

Criminal or Civil Actions ..... 7

Administrative Enforcement Proceedings..... 7

Self- Regulatory Organization Enforcement Proceedings .....	7
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>7</b>
Broker-Dealer or Representative Registration .....	7
Futures or Commodity Registration.....	8
Material Relationships Maintained by this Advisory Business and Conflicts of Interest.....	8
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest.....	8
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>8</b>
Code of Ethics Description.....	8
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest.....	9
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest.....	9
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest.....	9
<b>Item 12: Brokerage Practices.....</b>	<b>9</b>
Factors Used to Select Broker-Dealers for Client Transactions .....	9
Aggregating Securities Transactions for Client Accounts.....	10
<b>Item 13: Review of Accounts.....</b>	<b>11</b>
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved .....	11
Review of Client Accounts on Non-Periodic Basis .....	11
Content of Client Provided Reports and Frequency.....	11
<b>Item 14: Client Referrals and Other Compensation.....</b>	<b>11</b>
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest.....	11
Advisory Firm Payments for Client Referrals.....	11
<b>Item 15: Custody .....</b>	<b>11</b>
Account Statements.....	11
<b>Item 16: Investment Discretion.....</b>	<b>11</b>
Discretionary Authority for Trading .....	11
<b>Item 17: Voting Client Securities .....</b>	<b>12</b>
Proxy Votes.....	12
<b>Item 18: Financial Information.....</b>	<b>12</b>
Balance Sheet.....	12
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients .....	12

Bankruptcy Petitions during the Past Ten Years.....	12
Principal Executive Officer – Theodore Wolfstich .....	14
Item 2 - Educational Background and Business Experience .....	14
Item 3 - Disciplinary Information.....	15
Item 4 - Other Business Activities .....	16
Item 5 - Additional Compensation .....	16
Item 6 - Supervision.....	16

## Item 4: Advisory Business

### Firm Description

Wolfstich Capital, LLC ("Wolfstich") was founded in 2007. Theodore Wolfstich is 100% owner.

### Types of Advisory Services

#### ASSET MANAGEMENT

Wolfstich offers discretionary asset management services to advisory Clients. Wolfstich will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Wolfstich discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

If a conflict of interest exists between the interests of Wolfstich and the interests of the Client, the Client is under no obligation to act upon Wolfstich's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Wolfstich. Financial plans will be completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation.

### Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

### Wrap Fee Programs

Wolfstich does not sponsor any wrap fee programs.

### Client Assets under Management

As of December 31, 2022, Wolfstich had \$119,834,625 in discretionary assets under management and no non-discretionary assets under management.

## Item 5: Fees and Compensation

### Method of Compensation and Fee Schedule

#### ASSET MANAGEMENT

Wolfstich offers discretionary direct asset management services to advisory Clients. Wolfstich charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First \$3,000,000 (\$0-\$3,000,000)	1.00%	0.25%
Over \$3,000,000.01+	0.50%	0.125%

This is a blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. Wolfstich may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

**For example (based on quarterly billing period):**

Client with \$2,500,000 under management would pay \$6,250.00 on an quarterly basis.

<u>AUM</u>	<u>Quarterly fee</u>	<u>Total</u>
First \$2,500,000	x 0.25% =	\$6,250.00
Grand total for the quarter	<hr/> \$6,250.00	

The annual fee is negotiable. Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After five (5) business days, the Client may cancel by providing written notice to Wolfstich and Wolfstich may terminate advisory services with thirty (30) days written notice to the Client. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Wolfstich. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

**Client Payment of Fees**

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

**Additional Client Fees Charged**

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Wolfstich does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Wolfstich. For more details on the brokerage practices, see Item 12 of this brochure.

**Prepayment of Client Fees**

Wolfstich does not require any prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Investment management fees are billed quarterly in advance.



If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Wolfstich.

#### **External Compensation for the Sale of Securities to Clients**

Wolfstich does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Wolfstich.

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

#### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Wolfstich does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Wolfstich to recommend an investment that may carry a higher degree of risk to the Client.

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

#### **Description**

Wolfstich generally provides investment advice to individuals, high net worth individuals, and charitable organizations.

Client relationships vary in scope and length of service.

#### **Account Minimums**

Wolfstich does not require a minimum to open an account.

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

#### **Methods of Analysis**

In accordance with the Investment Plan for each client, Wolfstich Capital designs a portfolio, consisting of some combination of mutual funds, exchange traded funds, individual equities or fixed income securities. Investments are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Wolfstich Capital's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. Wolfstich Capital is generally a long-term investor, meaning that securities are generally purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

#### **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Wolfstich. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases and short-term purchases.

### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Wolfstich:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.

- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Foreign Investment Risk*: Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly- traded securities markets.
- *Bonds*: The risks associated with bonds include the inverse relationship between interest rates and bond prices. As interest rates fall, bond prices rise. Conversely, when interest rates rise, bond prices tend to fall. Investors must also be aware of credit/default risk, corporate bonds aren't guaranteed by the full faith and credit of the U.S. government, but instead depend on the issue's ability to repay the debt.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

Wolfstich and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

Wolfstich and its management have not been involved in administrative enforcement proceedings.

### **Self- Regulatory Organization Enforcement Proceedings**

Wolfstich and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Wolfstich or the integrity of its management.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary history of Wolfstich or its representatives upon request of the Massachusetts Securities Division.

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

### **Broker-Dealer or Representative Registration**

Wolfstich is not registered as a broker-dealer and no affiliated representatives of Wolfstich are registered representatives of a broker-dealer.

**Futures or Commodity Registration**

Neither Wolfstich nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Theodore Wolfstich does not have any financial affiliated business to disclose.

As a fiduciary, Wolfstich Capital, LLC has certain legal obligations, including the obligation to act in clients' best interest. Wolfstich Capital, LLC maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Wolfstich Capital, LLC has entered into a succession agreement with Buckingham Strategic Wealth, LLC, effective March 4, 2021. Wolfstich Capital, LLC can provide additional information to any current or prospective client upon request to Theodore J. Wolfstich, Managing Member at (781) 475-6157 or [ted@wolfstichcapital.com](mailto:ted@wolfstichcapital.com).

**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Wolfstich does not select or recommend other investment advisors.

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

The affiliated persons (affiliated persons include employees and/or independent contractors) of Wolfstich have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Wolfstich affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Wolfstich. The Code reflects Wolfstich and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Wolfstich's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Wolfstich may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Wolfstich's Code is based on the guiding principle that the interests of the Client are our top priority. Wolfstich's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Wolfstich will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Wolfstich and its affiliated persons do not recommend to clients securities in which we have a material financial interest.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Wolfstich and its affiliated persons may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Wolfstich with copies of their brokerage statements.

The Chief Compliance Officer of Wolfstich is Theodore Wolfstich. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Wolfstich does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Wolfstich with copies of their brokerage statements.

The Chief Compliance Officer of Wolfstich is Theodore Wolfstich. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

Wolfstich will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the

transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Wolfstich will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Wolfstich relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Wolfstich. Wolfstich does not receive any portion of the trading fees.

Wolfstich will require the use of TD Ameritrade, Charles Schwab, or Altruist.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Wolfstich from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Wolfstich has no formal soft dollar arrangements, Wolfstich may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Wolfstich receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Wolfstich. Wolfstich cannot ensure that a particular client will benefit from soft dollars or the client’s transactions paid for the soft dollar benefits. Wolfstich does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Wolfstich receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Wolfstich has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

Wolfstich does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

Wolfstich does not allow directed brokerage accounts.

### **Aggregating Securities Transactions for Client Accounts**

Wolfstich manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

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

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of Wolfstich. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Wolfstich's custodian. The client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Wolfstich does not provide additional reports to clients.

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

### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Wolfstich does not receive any economic benefits from external sources.

### **Advisory Firm Payments for Client Referrals**

Wolfstich does not compensate for Client referrals.

## **Item 15: Custody**

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Wolfstich.

Wolfstich is deemed to have limited custody solely because advisory fees are directly deducted from client's accounts by the custodian on behalf of Wolfstich.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

Wolfstich requires discretionary authority to manage securities accounts on behalf of clients. Wolfstich has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Wolfstich discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.



Wolfstich allows clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Wolfstich in writing.

Wolfstich does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

### **Proxy Votes**

Wolfstich does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Wolfstich will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

### **Balance Sheet**

A balance sheet is not required to be provided to clients because Wolfstich does not serve as a custodian for Client funds or securities and Wolfstich does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Wolfstich has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Wolfstich has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page  
**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Theodore Wolfstich

**Wolfstich Capital, LLC**

**Office Address:**

445 Main Street, Suite 303  
Medfield, MA 02052  
Tel: 508-242-9400

**[ted@wolfstichcapital.com](mailto:ted@wolfstichcapital.com)**

**Website:**

**[www.wolfstichcapital.com](http://www.wolfstichcapital.com)**

This brochure supplement provides information about Theodore Wolfstich and supplements the Wolfstich Capital, LLC brochure. You should have received a copy of that brochure. Please contact Theodore Wolfstich if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Theodore Wolfstich (CRD #2739474) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**October 25, 2023**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

#### Principal Executive Officer – Theodore Wolfstich

- Year of birth: 1972

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

##### Educational Background:

- State University of New York College at Brockport; Bachelor of Science – Political Science; 1994

##### Business Experience:

- Wolfstich Capital, LLC.; Managing Member/Investment Advisor Representative/Chief Compliance Officer; 01/2008-Present

#### Professional Certifications

*Theodore Wolfstich* has earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold 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.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 - Disciplinary Information**

- A. Mr. Wolfstich has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
  1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Wolfstich never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
  1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

- C. Mr. Wolfstich has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Wolfstich has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

**Item 4 - Other Business Activities**

Theodore Wolfstich does not have any financial affiliated business to disclose.

**Item 5 - Additional Compensation**

Theodore Wolfstich does not receive any additional compensation.

**Item 6 - Supervision**

Theodore Wolfstich is the sole owner and Chief Compliance Officer of Wolfstich. He is responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at [ted@wolfstichcapital.com](mailto:ted@wolfstichcapital.com) or (781) 475--6157.