FORM ADV PART 2A
DISCLOSURE BROCHURE

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This brochure provides information about the qualifications and business practices of Success Wealth Management 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 724-934-8128. 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 Success Wealth Management LLC (CRD #299094) is available on the SEC's website at www.adviserinfo.sec.gov

OCTOBER 13, 2026

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 on June 17, 2026, the following has changed:

- Effective October 1, 2026, Lisa Evans of Concierge Compliance serves as SWM's Chief Compliance Officer, replacing Brian Goldman. Brian Goldman remains Managing Member and sole owner of SWM. Items 10, 11 and 13 and the Brochure Supplement (Part 2B) have been updated accordingly.
- Item 14 has been updated to disclose the compensation SWM receives in connection with the SAVE Program and to update the referral disclosure to reflect the SEC Marketing Rule.

Full Brochure Available

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

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Item 4: Advisory Business

Firm Description

Success Wealth Management LLC ("SWM") was founded in July 2018 and became a Registered Investment Advisor in January 2019. Brian Goldman is 100% owner of SWM.

Types of Advisory Services

ASSET MANAGEMENT

SWM offers discretionary asset management services to advisory Clients. SWM 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 SWM discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

SUB-ADVISOR

SWM offers clients access to the Market Savings Liquid Program (the "Program") through a sub-advisory arrangement with SAVE. SWM retains responsibility for client relationships, suitability determinations, and overall portfolio allocation.

SAVE acts as a discretionary sub-adviser for assets allocated to the Program and is responsible for all investment decisions. SAVE invests in strategy-linked securities based on the client's investment profile.

Clients participating in the Program must open a bank account and a custodial account. Client principal is held in the bank account, while investments are held in the custodial account. Clients forgo interest on bank deposits, and instead, funds derived from the Program are used to purchase investments. Any investment returns are transferred back to the client's bank account at the end of the investment term.

FINANCIAL PLANNING AND CONSULTING

SWM offers the following financial planning and consulting services as outlined below:

Full Financial Plan

Financial planning services include a complete evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. SWM will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals**: Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement**: A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis**: An income and spending plan determines how much can be set

aside for debt repayment, savings and investing each month.

- **Retirement strategy**: A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan**: Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan**: Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy**: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation**: Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

Consultation Services

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may select individual topics above, or other topics as may be deemed appropriate. The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

If a conflict of interest exists between the interests of SWM and the interests of the Client, the Client is under no obligation to act upon SWM's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through SWM. Financial plans will be completed and delivered inside of thirty (30) 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

SWM does not sponsor any wrap fee programs.

Artificial Intelligence

SWM uses various technologies, including artificial intelligence ("AI"), to improve its business operations.

- Marketing: AI tools may be used to assist in drafting marketing materials, which are

reviewed by human staff for accuracy.

- Note-Taking: SWM may use AI-powered, third-party tools to transcribe and summarize client meetings. These tools are used to enhance recordkeeping accuracy, and we obtain Client consent prior to use in meetings.

SWM does not utilize AI to make investment decisions or to analyze securities. We believe the use of these tools provides operational efficiencies but acknowledge that they may introduce risks regarding data privacy. We maintain oversight of these tools to ensure they align with our fiduciary duty to our clients.

Client Assets Under Management

SWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$110,470,000	$0	April 15, 2026

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

SWM offers discretionary direct asset management services to advisory Clients. Lower fees for comparable services may be available from other sources. Total fees to Client will never exceed 3% of assets under management per year. SWM charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
$0 - $250,000	1.50%	0.375%
$250,001 - $1,000,000	1.25%	0.3125%
$1,000,001 and up	1.00%	0.25%

This is a tiered or breakpoint fee schedule, the entire portfolio is charged the same asset management fee. For example, a Client with $750,000 under management would pay $9,375 on an annual basis. $750,000 x 1.25% = $9,375.

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in arrears 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. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the day's services are provided during the given period. All unpaid earned fees will be due to SWM. 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.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian. Each month, clients will receive a

statement from their account custodian showing all transactions in their account, including the fee. Fees are calculated by SWM and not independently calculated by the custodian. Clients should carefully review their statements, including the fee amounts, and let SWM know of any questions.

The investment advisory fee is billed directly to the Custodian. The Custodian deducts the fee for the Account upon receipt of the invoice, or shortly thereafter. SWM will not be compensated based on the basis of a share of capital gains or capital appreciation of the assets in the Account.

In computing the market value of any investment in the Account, each security listed on any national securities exchange or otherwise subject to current last-sale reporting shall be valued at the last sale price on the valuation date. However, for assets such as alternative investments where a fee is charged and the custodian does not price the security, the asset may be priced by the provider of the asset according to their pricing policy or may also involve independent pricing services for assets that are priced in that manner. SWM itself, does not price any investment or security for which it charges a management fee or that is included in the portfolio return.

There are a number of other fees that can be associated with holding and investing in securities. These include some fees that may be paid by SWM on your behalf, such as transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock, as discussed above. All other fees will be deducted from your account. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. When selecting mutual funds that have multiple share classes for recommendation to clients, SWM will take into account the internal fees and expenses associated with each share class, and it is SWM policy to choose the lowest-cost share class, absent circumstances that dictate otherwise. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. SWM can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

SUB-ADVISOR

For assets held in the SAVE Program, SAVE nor SWM do not charge a direct advisory fee. Instead, the Partner Bank pays revenue associated with client deposits. From this revenue, a 0.70% annual fee (calculated daily and deducted monthly) is paid to Save Tech for platform services. SWM receives 0.10% of the amount paid for platform services.

This fee is not charged directly to client accounts but reduces the amount available for investment, meaning clients bear the cost indirectly.

For example, if a client deposits $100,000 and the account earns 4.50% annually, it would generate approximately $375 in interest for the month.

From this amount, a 0.70% annual fee would equal about $58.33 for that month. This fee is deducted from the program revenue (not directly from the client's account).

The remaining, approximately $316.67, is then used to purchase strategy-linked investments in the client's custodial account.

FINANCIAL PLANNING AND CONSULTING

SWM charges fixed fee based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee.

FIXED FEES

Financial Planning Services are offered based on a negotiable flat fee up to $5,000.

Fees for financial plans are due upon delivery of the completed plan/recommendations.

Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. 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 SWM. SWM reserves the right to waive the fee should the Client implement the plan through SWM.

Client Payment of Fees

Investment management and assets held away fees are billed quarterly in arrears. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed:

- Check – to be remitted by Client to SWM.
- Electronic Payment via ACH, Debit Card, Credit Card, Venmo and/or PayPal (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. SWM will not have continuous access to the Client's banking information.)

SWM, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transaction fees, postage and handling and miscellaneous fees.

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

SWM does not require any prepayment of fees of more than $1,200 per Client and six months or more 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 SWM. All refunds will be sent via Check to the Client's address of record within ten (10) days termination.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of SWM receive external compensation sales of investment related products such as insurance as licensed insurance agents. From time to

time, they will offer clients services from those activities. More than 90% of Mr. Goldman's compensation is from external compensation.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As an insurance agent, Mr. Goldman does not charge advisory fees on the insurance products he receives a commission on. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

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.

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

Item 7: Types of Clients

Description

SWM generally provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

Account Minimums

SWM does not require a minimum to open an account.

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

Methods of Analysis

Security analysis methods include Modern Portfolio Theory. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Modern Portfolio Theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

SWM may participate in initial public offerings (IPOs) for client accounts. Our methods of analysis for IPO investments involve a fundamental assessment of the issuing company's business model, management team, industry dynamics, and financial valuation to determine if the offering aligns with a client's investment objectives and risk tolerance.

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 SWM. 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, short-term purchases and trading.

Depending on a client's given circumstances, SWM may recommend that a client rollover retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result, SWM may earn fees on those accounts. This presents a conflict of interest, as SWM has a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. This conflict is disclosed to clients verbally and in this brochure. Clients are also advised that they are under no obligation to implement the recommendation to roll over retirement plan assets. SWM attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

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. Investing in securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks and should discuss these risks with SWM:

- *Market Risk*: The prices of securities held by mutual funds 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.
- *Alternative Investments Risk:* Alternative investments involve a high degree of risk and can be illiquid due to restrictions on transfer and lack of a secondary trading market. They can be highly leveraged, speculative and volatile, and an investor could lose all or a substantial amount of an investment.
- *Private Equity/Placement Risk:* Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.
- *Structured Notes Risk:* The risks involved with using structured notes include but are not limited to credit risk of the issuing investment bank, illiquidity, and there is a risk to the pricing accuracy as most structured notes do not trade after issuance.

  Structured notes carry the risk of losing the entire investment. They are also subject to creditor risk, meaning investors could lose their principal if the issuer defaults. Additionally, a decline in the underlying asset could result in a total loss of principal. Selling structured notes before maturity may be challenging and could lead to substantial losses. These investments also carry call risk, which is the possibility that the issuer may redeem the note before its maturity—typically when interest rates decline, but potentially at any time depending on the terms—thereby limiting investor returns. Clients whose goals are not aligned should not invest.

- *Initial Public Offerings* (IPOs): Investing in IPOs involves a higher degree of risk than investing in more established, seasoned public companies. IPO shares are subject to significant market volatility, particularly during the initial trading period. The market value of IPO shares can fluctuate dramatically due to factors such as market psychology, limited historical financial data, and lack of a public trading history. Clients may suffer significant financial losses on IPO investments. Furthermore, IPOs may be subject to Lock-Up Agreements (where insiders and early investors are restricted from selling shares for a specified period after the offering), which can limit the Advisor's ability to liquidate the position in a timely manner. The firm's ability to access IPOs may also be limited, resulting in inconsistent allocation across client accounts.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
    - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
    - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self- Regulatory Organization Enforcement Proceedings

SWM 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 SWM or the integrity of its management.

For Massachusetts Clients Only: Pursuant to Mass. Code Regs. 12.205(8)(d), Clients can obtain the disciplinary history of SWM or its representatives upon request of the Massachusetts Securities Division.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

SWM is not registered as a broker-dealer and no affiliated investment advisor representative(s) of SWM are registered representative(s) of a broker-dealer.

Futures or Commodity Registration

Neither SWM 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
Managing Member Brian Goldman is a licensed insurance agent and retirement specialist with Success Financial Solutions, LLC. Approximately 50% of his time is spent on these activities. From time to time, he will offer Clients insurance products and receive commissions from the sale of insurance products.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Some investment advisor representatives of SWM may provide insurance services to California clients.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest
SWM may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and SWM. Sub-Advisors execute all trades on behalf of SWM in Client accounts. SWM will be responsible for the overall direct relationship with the Client. SWM retains the authority to terminate the Sub-Advisor relationship at SWM's discretion.

In addition to the authority granted to SWM, Clients will grant SWM full discretionary authority and authorizes SWM to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to SWM in the Agreement. In addition, at SWM's discretion, SWM may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. SWM ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

This practice represents a conflict of interest as SWM may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that SWM has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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 SWM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of SWM affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of SWM. The Code reflects SWM 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.

SWM's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of SWM 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.

SWM's Code is based on the guiding principle that the interests of the Client are our top priority. SWM'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.

SWM 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

SWM and its affiliated persons do not recommend to Clients securities in which we have a material financial interest. However, SWM and its affiliated persons have a financial interest in certain products and program they recommend:

- SAVE Program. When Client assets are allocated to the Market Savings Liquid Program, SWM received a portion of the platform fee paid to Save Tech, as described in Item 5. SWM therefore has an incentive to recommend the Program over alternatives that do not pay SWM.
- Insurance Products. Brian Goldman, DWM's Managing Member, is a licensed insurance agent with American Senior Benefits and received commissions on insurance products he sells to Clients, as described in Item 5 and 10. He therefore has an incentive to recommend insurance products based on the commission received.

SWM addresses these conflicts through disclosure, through its policies and procedures, and through its fiduciary duty to act in the Client's best interest. Clients are never required to participate in the Program or to buy insurance through Mr. Goldman. See Items 5, 10 and 14 for more information.

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

SWM 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 SWM with copies of their brokerage statements.

Effective October 1, 2026, the Chief Compliance Officer of SWM is Lisa Evans. She reviews all trades of the affiliated persons, including those of Brian Goldman, 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

SWM does not maintain a firm proprietary trading account. Except as described above under "Investment Recommendations Involving a Material Financial Interest," SWM does not have a material financial interest in any securities being recommended to Clients. However, affiliated persons may buy or sell securities for their own account at the same time they recommend, buy or sell the same 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 SWM with copies of their brokerage statements.

Effective October 1, 2026, the Chief Compliance Officer of SWM is Lisa Evans. She reviews all employee trades, including those of Brian Goldman, 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

SWM 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. SWM will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. SWM 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 SWM. SWM does not receive any portion of the trading fees.

SWM will recommend the use of Charles Schwab & Co., Inc. or Altruist.

- *Directed Brokerage*
  In circumstances where a Client directs SWM to use a certain broker-dealer, SWM still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: SWM's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals. SWM may be unable to achieve most favorable execution of Client transactions, and this practice may cost Clients more money.

- *Best Execution*

  Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. 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 effected, the ability to affect 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. The firm does not receive any portion of the trading fees.

- *Brokerage for Client Referrals*
  SWM does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Soft Dollar Arrangements*

  SWM does not receive soft dollar benefits

Aggregating Securities Transactions for Client Accounts

SWM is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of SWM. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Certain investment opportunities, including IPOs and other limited offerings, may be available in quantities insufficient to satisfy all client interest. In such circumstances, SWM will allocate opportunities among eligible clients pursuant to its allocation policies and procedures, which are designed to achieve fair and equitable treatment over time. Clients who specifically request participation in a particular offering may receive priority consideration for allocations. However, no client is guaranteed participation or any particular allocation amount.

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 Brian Goldman, Managing Member and Investment Adviser Representative of SWM. 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 bands 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 SWM's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

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

SWM receives additional economic benefits from external sources as described above in Item 12. In addition, SWM receives a portion of the platform fee paid to Save Tech in connection with the SAVE Program, as described in Item 5. Because SWM is compensated when Client assets are allocated to the Program, SWM has an incentive to recommend the Program over other alternatives. This conflict is mitigated by disclosure, by SWM's fiduciary duty to act in the best interest of its Clients, and by the fact that Clients are not required to participate in the Program.

Advisory Firm Payments for Client Referrals

SWM may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with SWM, that refer Clients to SWM in exchange for compensation. All such arrangements will be documented in a written agreement where required and will comply with Rule 206(4)-1 under the Investment Advisers Act of 1940 (the "Marketing Rule") and applicable state law. If a Client is introduced to SWM by a referring party, SWM may pay that referring party a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon SWM's engagement of new Clients and is calculated using a fixed fee or varying percentage of the fees paid to SWM by such Clients. Any such fee shall be paid solely from SWM's investment management fee, and shall not result in any additional charge to the Client.

Each prospective Client who is referred to SWM under such an arrangement will receive a copy of this brochure and a disclosure, provided at the time of the referral, stating that the referring party is compensated by SWM, whether the referring party is a current Client of SWM, the material terms of the compensation arrangement, and any material conflicts of interest arising from the referral relationship. Compensated referrals create a conflict of interest because the referring party has a financial incentive to recommend SWM. SWM addresses this conflict through disclosure and oversight of its referral arrangements.

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 compare the account statements received directly from their custodians to any documentation or reports prepared by SWM.

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

Item 16: Investment Discretion

Discretionary Authority for Trading

SWM requires discretionary authority to manage securities accounts on behalf of Clients. SWM 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.

SWM allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to SWM in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. SWM 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

SWM 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, SWM is available to answer questions. If a conflict of interest exists, it will be disclosed to the Client. Client may call SWM at 724-934-8128 with questions.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because SWM does not serve as a custodian for Client funds or securities and SWM 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

SWM 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

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