

Item 1: Cover Page

Singer Wealth Advisors LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Singer Wealth Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (561) 998-9985 or by email at: keith@singerwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Singer Wealth Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Singer Wealth Advisors LLC.'s CRD number is: 317218.

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Registration does not imply a certain level of skill or training.

Version Date: 06-02-2022

Item 2: Material Changes

The Spartan strategy has been removed from platform

Variable Annuities with Schwab as Agent of Record available

Item 3: Table of Contents

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Item 4: Advisory Business

Business Description

Our advisory firm is an SEC registered investment advisory firm. We provide investment advisory services to individuals, high-net-worth individuals, corporations, and pension and profit-sharing plans concerning various securities, including mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, structured notes, options, commodities and non-U.S. securities. As a registered investment advisor, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our clients’ interests first and must fully disclose any potential conflict of interest. We do not directly hold customer funds or securities and all transactions are sent to qualified custodians which execute, compare, allocate, clears, and settles them. Qualified custodians maintain our clients’ accounts and may grant clients access to them.

A. Description of the Advisory Firm

Singer Wealth Advisors LLC. (Herein after “SWA”) is a corporation organized in the State of Florida. We may market under the name Singer Wealth.

The firm was formed in January 2014 and the principal owner is Keith Singer. In August 2021 Singer Wealth Advisors, Inc. became Singer Wealth Advisors, LLC.

B. Types of Advisory Services

Portfolio Management Services

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

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

SWA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWA will request discretionary authority from clients to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement.

SWA seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of SWA's economic, investment or other financial interests. To meet its fiduciary obligations, SWA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, SWA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is SWA's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Third Party Platforms

Singer Wealth Advisors offers advisory and sub-advisory services to other investment advisory firms, (RIA Clients). RIA clients use models offered by Third Party Money Managers for the allocation of their client (End Clients) portfolios.

Singer Wealth Advisors has contracted with Castlevue Partners, LLC to utilize its technology platforms for trade execution, data reconciliation, fee calculation and billing, client database maintenance, quarterly performance evaluations, and other functions related to the administrative tasks of managing client accounts. Due to this arrangement, Castlevue Partners can have access to client accounts including the ability to trade in accounts and debit advisory fees from accounts; however, Castlevue Partners will not serve as an investment advisor to Singer Wealth Advisors clients.

Castlevue Partners, LLC makes available certain Sub-Advisors that SWA can select to assist with the management of client accounts. Each client will grant Castlevue Partners, LLC full authority to (i) invest and reinvest the assets in accounts and, (ii) retain Sub-Advisors with respect to all or a part of account assets. This means Castlevue Partners, LLC will have trading authority on client account which is necessary to trade investments recommended by Singer Wealth Advisors and/or Sub-Advisors.

Castlevue calculates fees in arrears using an average of the daily balance in the client's account at the end of the preceding quarter. Fees are withdrawn directly from the clients' accounts on a quarterly basis.

Model Managers/Sub-Advisors

As part of our Asset Management Services, we are able to select or recommend the use of unaffiliated, third-party investment advisors serving as "Sub-Advisors" to manage all or a portion of your assets. Through these relationships we can direct the use of tactically managed strategies or managed models on their platform. The selection of Sub-Advisors is affected on a discretionary basis. This means we can "hire and fire" the Sub-Advisors from your account without consulting with you in advance.

Any Sub-Advisor recommended by us shall be registered or exempt from registration in your home state of residence. The decision to use a Sub-Advisor is always based on each client's individual needs. A complete description of the third-party investment advisor's services

acting as Sub-Advisor, fee schedules and account minimums are disclosed in the third party investment advisor's Form ADV Disclosure Brochure which will be provided to clients at the time an agreement for services is executed and account is established with the Sub-Advisor, (if hired on a non-discretionary basis), or when we add or remove a Sub-Advisor from your account, (if selected on a discretionary basis).

Variable Annuities

Variable Annuities offered with Charles Schwab as agent of record. SWA holds limited power of attorney on clients' variable annuity accounts, allowing for the deduction of management fees as well as choosing and/or changing investment sub accounts.

Assignment of SWA Investment Advisory agreement may be made after investor's receipt of notification from Singer Wealth Advisors to investors identifying the proposed transaction. If notification is not received from investors within 60-days of receipt, SWA will presume no response is negative consent and will proceed with the transaction as described in notification sent.

We are always available to answer questions you may have regarding the portion of your account managed by the Sub-Advisor, and act as the communication conduit between you and the Sub-Advisor. Sub-Advisors will take discretionary authority to determine the securities to be purchased and sold for your accounts managed by the Sub-Advisor. We will not utilize trading authority with respect to your Accounts(s) and/or assets managed by a Sub-Advisor.

Financial Planning

Financial plans and financial planning may include but are not limited to investment planning; life insurance; tax concerns; retirement planning; college planning; and debit/credit planning.

Services Limited to Specific Types of Investments

SWA does not generally limit its investment advice. Investment advice includes blue chip stocks, ETFs (including ETFs in the gold and precious metal sectors), mutual funds, fixed income securities, real estate funds (including REITs), insurance products (including annuities), equities, treasury inflation protected/inflation linked bonds, structured notes, and other alternative investments, commodities and non-U.S. securities, options and private investments. SWA will consider other investments at the request of a client.

On occasion, Singer Wealth Advisors will offer non-publicly traded alternative investments to qualified investors. The standard Singer Wealth Advisors management fee will be assessed and will be documented in the advisory contract.

On occasion, Singer Wealth Advisors will present a private lending opportunity to accredited investors. Documentation is provided to the potential investor by the mortgage company. This investment is purchased directly with the mortgage company; management fees will be collected from the associated Schwab account under SWA management. Asset will not appear

in the Schwab account. The standard Singer Wealth Advisors management fee will be assessed and will be documented in the advisory contract.

C. Client Tailored Services and Client Imposed Restrictions

SWA offers the same suite of services to all its clients (predicated on the client meeting required criteria, if any, including but not limited to accredited investor status). However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent SWA from properly servicing the client account, or if the restrictions would require SWA to deviate from its standard suite of services, SWA reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. SWA does not participate in any wrap fee programs.

E. Assets Under Management

SWA has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated |
|------------------------|----------------------------|-------------------|
| \$298,380,789 | \$0 | December 31, 2021 |

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

| Total Assets Under Management | Annual Fee |
|-------------------------------|------------|
| Up to \$1,000,000 | 2.00% |
| \$1,000,001 and above | 1.50% |

These fees, which represent individually managed portfolios, are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of SWA's fees within five business

days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

SWA calculates fees in arrears using the value of the account on the last business day of the previous quarter. With the clients' written permission fees are withdrawn directly from the client's accounts on a quarterly basis. Upon client request and approval of SWA, fees may be invoiced, and payment remitted via check or credit card. For the first billing cycle for new accounts fees will be prorated as of the date of receipt of the first assets in the clients' account. If an existing SWA managed account is transitioning from another strategy/fee schedule, the new fee will be billed for that full quarter.

SWA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Payment of Tactical Management Account Fees

Fees for Tactical Management Accounts are up to 2%.

These fees, which represent individually managed portfolios, and the final fee schedule are attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of SWA's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

SWA calculates fees in arrears using the value of the account on the last business day of the previous quarter. With clients' written authorization, fees are withdrawn directly from the clients' accounts on a quarterly basis. Upon client request and approval of SWA, fees may be invoiced, and payment remitted via check or credit card. For the first billing cycle on new accounts, fees will be prorated as of the date of receipt of first assets into the account. If an existing SWA managed account is transitioning from another strategy/fee schedule, the new fee will be billed for that full quarter.

Charging higher fees for some strategies versus others is a conflict of interest controlled by investment guidelines, risk tolerance, and investment objectives as described in Exhibit I. The fees charged by SWA for any tactically managed strategy may be higher than fees charged for other model portfolios due to the actively traded nature of the strategy. On occasion SWA may utilize money managers, sub-advisers, or third-party platforms to trade a tactical strategy; fees are detailed under "3rd Party Platform/ Money Managers" on advisory contract

SWA believes that its annual fee for tactical management is reasonable in relation to: (1) services provided under this Agreement and (2) the fees charged by other investment advisers offering similar services/programs. In addition to compensation of SWA, Client may also incur transactional charges imposed by the custodian and underlying investment fund level.

Selection of Other Advisors Fees

SWA may direct clients to third-party investment advisors. SWA will receive its standard fee on top of the fee paid to the third-party advisor. The fee is divided and paid to (1) SWA (for its services as investment adviser and sponsor of the program), (2) selected third-party investment adviser(s) (i.e., Model Provider, Sub-Adviser) if any, and (3) third-party, administrative service provider(s) if any.

This relationship will be memorialized in each contract between SWA and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisors will depend on the specific third-party advisor selected.

Payment of Selection of Other Advisors Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party advisor selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor in Exhibit II of the contract.

Financial Planning Fees/Fixed Fees

The rate for creating client financial plans is between \$1,000 and \$100,000. The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

Clients may terminate the agreement without penalty for a full refund of SWA's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Payment of Financial Planning Fees

Financial planning fees are paid via check or with credit card. Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

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B. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SWA. Please see Item 12 of this brochure regarding custodian/ third parties.

C. Prepayment of Fees

SWA collects fixed financial planning fees in advance and the remainder of its fees in arrears, as indicated herein. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

D. Outside Compensation for the Sale of Securities to Clients

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

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

SWA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Sub-advisers do not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SWA generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Corporations

Minimum Account Size for Portfolio Management

There is an account minimum of \$250,000, which may be waived by SWA in its discretion.

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

A. Methods of Analysis and Investment Strategies

SWA's methods of analysis include fundamental analysis, and tactical analysis.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. Fundamental Analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Tactical analysis is a short-term speculative strategy, which utilizes technical analysis to track and predict the short-term movement of major stock indices. The strategies remain in cash until such time the analysis identifies a "high probability" trade. These strategies are designed for an investor's risk capital; it is for investors with capacity and tolerance for risk and is not for conservative investors.

Singer Wealth Advisors does not assume any responsibility or liability for investment results. Using a market timing trading strategy may result in tax consequences There is more risk involved with this strategy than with other strategies.

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

B. Risks of Specific Securities Utilized

Mutual Funds carry the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

Equity investments generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of

equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount and frequency of the payments can vary. This type of investment can include corporate and government debt securities, municipal bonds, leveraged loans, high yield, investment grade debt, and structured products, such as mortgage and other asset-backed securities. Although individual bonds may be the best-known type of fixed income security, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETF) is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes

and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Options and Derivatives involve risks and are not suitable for every investor. Options trading can be speculative in nature and carry substantial risk of loss. *Characteristics and Risks of Standardized Options* should be read prior to investing.

Structured Products involve significant risks. For a detailed discussion of the risks involved in investing in any particular structured product, reference the relevant offering materials for that investment. Singer Wealth Advisors, LLC does not guarantee in any way the obligations or the financial condition of any issuer or the accuracy of any financial information provided by any issuer. Structured products may have limited or no liquidity, and investors should be prepared to hold their investment to maturity. The tax treatment of a structured product may be complex and may differ from a direct investment in the underlying asset. Investors should consult their own tax advisor about their tax situation before investing in any securities. Investing in structured products is not suitable for all clients given their complexity and significant risks.

Private Mortgage Investment

- **Default risk:** If the borrower fails to make timely payment that will adversely affect the timing of expected cash flows.
- **Collateral risk:** If the collateral drops in value and the borrower defaults private lenders could lose a portion of their investment.
- **Liquidity risk:** There is a possibility that there will be no secondary market for the loan if the lender wishes to get their money back prior to maturity.
- **Interest rate risk:** Once the loan matures, there is no guarantee that there will be another similar loan available in which to reinvest the repaid loan proceeds.
- **Servicing risk:** If the loan servicer fails to fulfill their contractual obligations or becomes insolvent a majority of the borrowers will need to appoint a new servicer.
- **Participation risk:** All decisions related to the servicing and management of the loan is subject to a majority of the owners of the loan. It's possible that not all of the investors may agree on the appropriate course of action.

Private Lending Opportunities

- **Default risk:** If the borrower fails to make timely payment that will adversely affect the timing of expected cash flows.
- **Collateral risk:** If the collateral drops in value and the borrower defaults private lenders could lose a portion of their investment.

- Liquidity risk: There is a possibility that there will be no secondary market for the loan if the lender wishes to get their money back prior to maturity.
- Interest rate risk: Once the loan matures, there is no guarantee that there will be another similar loan available in which to reinvest the repaid loan proceeds.
- Servicing risk: If the loan servicer fails to fulfill their contractual obligations or becomes insolvent a majority of the borrowers will need to appoint a new servicer.
- Participation risk: All decisions related to the servicing and management of the loan is subject to a majority of the owners of the loan. It's possible that not all of the investors may agree on the appropriate course of action.

Non-Publicly Traded Alternative Investments

- Liquidity risk: There is a possibility that there will be no secondary market for the loan if the lender wishes to get their money back prior to maturity.
- Performance risk: There is risk that the investment will not do well or be profitable.
- May have complex legal and tax considerations.
- May be highly leveraged.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

Steven Eric Trachtenberg plead No contest to trespassing and no plea for possession. He was charged with possession of a controlled substance. Steven Eric Trachtenberg attended drug court 2007- 2008.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

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

Keith Eric Singer, Janyl Smith, Steven Eric Trachtenberg, John Hutchins, and Matthew Binder are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment advisor. SWA always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of SWA in such individuals outside capacities.

Keith Singer is the president of Insured Returns LLC, and Keith Singer P.A. and holds his J.D. Engaging Keith Singer P.A. for legal services is a conflict of interest in that it generates additional revenue for Keith Singer, the owner of SWA. This conflict is mitigated by attaining informed (written) consent from the client acknowledging their understanding between the conflict of Keith Singer P.A. and SWA. Clients are under no obligation to hire Keith Singer P.A. for legal services, and clients are free to engage any attorney of their choice. Offering of legal services through Keith Singer P.A. is made as an accommodation to the client and when legal services are in the best interest of the client. SWA does not view legal services by Keith Singer P.A. as a profit center. Fees for legal services are independent of SWA fees, services, and advice. Steven Trachtenberg is the owner of SET Wealth LLC, Vineyards LLC, and Zama LLC. Steven Trachtenberg has acquired 10% ownership in Singer Wealth Advisors LLC.

Janyl Smith is the president of Janyl Smith P.A and holds her J.D. Mrs. Smith is "Of Counsel" for Keith Singer P.A. Engaging Keith Singer P.A. or Janyl Smith P.A for legal services is a conflict of interest in that it generates additional revenue for Keith Singer, as owner of SWA, and/or Janyl Smith. This conflict is mitigated by attaining informed (written) consent from the client acknowledging their understanding between the conflict of Keith Singer P.A., Janyl Smith P.A, and SWA. Clients are under no obligation to hire Keith Singer P.A. or Janyl Smith P.A for legal services, and clients are free to engage any attorney of their choice. Offering of legal services through Keith Singer P.A. or Janyl Smith P.A is made as an accommodation to the client and when legal services are in the best interest of the client. SWA does not view legal services by Keith Singer P.A. as a profit center. Fees for legal services are independent of SWA fees, services, and advice.

Roy Daniel Rosner is currently the sole owner and sole employee of Futureproof Finances LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. SWA always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of SWA in such individuals outside capacities.

Charging higher fees for some strategies versus others is a conflict of interest controlled by investment guidelines, risk tolerance, and investment objectives as described in Exhibit I. The fees charged by SWA for any tactically managed strategy may be higher than fees charged for other model portfolios due to the actively traded nature of the strategy. On occasion SWA may utilize money managers, sub-advisers, or third-party platforms to trade a tactical strategy; fees are detailed under “3rd Party Platform/Money Managers” on advisory contract.

SWA believes that its annual fee for tactical management is reasonable in relation to: (1) services provided under this Agreement and (2) the fees charged by other investment advisers offering similar services/programs. In addition to compensation of SWA, Client may also incur transactional charges imposed by the custodian and underlying investment fund level.

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

SWA may direct clients to third-party investment advisors. Clients will pay SWA its standard fee in addition to the standard fee for the advisors to which; it directs those clients. This relationship will be memorialized in Exhibit II of each contract between SWA and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. SWA will always act in the best interests of the client, including when determining which third-party investment advisor to recommend to clients. SWA will ensure that all recommended advisors are licensed, or notice filed in the states in which SWA is recommending them to clients.

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

A. Code of Ethics

SWA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties,

Training and Education, Recordkeeping, Annual Review, and Sanctions. SWA's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing/Trading Personal Money in the Same Securities as Clients

From time to time, representatives of SWA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of SWA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. SWA will document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Third Parties.

Custodians/third parties will be recommended based on SWA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and SWA may also consider the market expertise and research access provided by the custodian/third parties, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in SWA's research efforts. SWA will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian/third parties.

SWA recommends and currently has an investment advisors service agreement with Charles Schwab & Co., Inc., (CRD # 5393) as a custodian.

Research and Other Soft-Dollar Benefits

While SWA has no formal soft dollar's program in which soft dollars are used to pay for third party services, SWA may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). SWA may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any client will benefit from soft dollar research, whether or not the client's transactions paid for it, and SWA does not seek to allocate benefits to client accounts

proportionate to any soft dollar credits generated by the accounts. SWA benefits by not having to produce or pay for the research, products, or services, and SWA will have an incentive to recommend a custodian based on receiving research or services. Clients should be aware that SWA's acceptance of soft dollar benefits may result in higher commissions charged to the client.

Third Party Client Referrals

SWA receives no referrals from a third party in exchange for using that third party.

Clients Directing Which Brokerage/Custodian/Third Party to Use

SWA may permit clients to direct it to execute transactions through a specified custodian/third party. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of custodians/third parties supersedes any authority granted to SWA to select custodians/third parties; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless SWA is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisors allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If SWA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, SWA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SWA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

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

All client portfolio managed accounts are reviewed at least annually by Keith Singer or an assigned financial advisor regarding clients' respective investment policies and risk tolerance levels. The assigned financial advisor reviews client accounts each time any material changes occur within the account or client circumstances.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Keith Singer. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a quarterly report detailing the client's account, including assets held, asset value, and fees. This written report will come from SWA or the custodian.

With respect to financial plans, SWA's services will generally conclude upon delivery of the financial plan. Each client will receive the financial plan upon its completion.

Item 14: Client Referrals and Other Compensation

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

SWA may receive compensation from third-party advisers to which it directs clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

SWA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

SWA is deemed to have custody of client funds and securities whenever the firm is given the authority to have fees deducted directly from client accounts.

For accounts in which SWA is deemed to have custody, the Firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.

Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. **Clients should carefully review those statements and are urged to compare the statements against reports received from SWA.** When clients have questions about their account statements, they should contact SWA or the qualified custodian preparing the statement

Item 16: Investment Discretion

SWA provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, SWA generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Custody is disclosed in Form ADV because SWA has authority to transfer money from client account(s), which constitutes a standing letter or authorization (SLOA). Accordingly, SWA will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 17: Voting Client Securities (Proxy Voting)

SWA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

For any recommended/selected Model Provider please reference their form ADV Part 2A with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the Account.

Item 18: Financial Information

A. Balance Sheet

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

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

Neither SWA nor its management has any financial condition that is likely to reasonably impair SWA's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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