

# Accurate Wealth Management, LLC

## Part 2A Appendix 1 of Form ADV:

### *Wrap Fee Program Brochure*

Date: March 29, 2024

*This wrap fee program brochure provides information about the qualifications and business practices of Accurate Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (813) 994-0984 or by email at: [pharris@accuratewealth.com](mailto:pharris@accuratewealth.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 Accurate Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Accurate Wealth Management, LLC's CRD number is: 298137.*

**2211 ASHLEY OAKS  
CIRCLE WESLEY  
CHAPEL, FL 33544  
(813) 994-0984**

**[WWW.ACCURATEADVISORYGROUP.COM](http://WWW.ACCURATEADVISORYGROUP.COM)**

*Registration as an investment adviser does not imply a certain level of skill or training.*

## General

### Item 2: Material Changes

Since our last annual report on Form ADV, there have been no material changes in the business or operations of Accurate Wealth Management.

### Item 3: Table of Contents

#### Contents

Item 2: Material Changes.....	2
Item 3: Table of Contents .....	2
Item 4: Services, Fees, and Compensation .....	3
Item 5: Account Requirement and Types of Clients .....	4
Item 6: Portfolio Manager Selection and Evaluation .....	<del>45</del>
Item 7: Client Information Provided to Portfolio Managers.....	<del>67</del>
Item 8: Client Contact with Portfolio Managers.....	<del>67</del>
Item 9: Additional Information Managers.....	<del>67</del>
Item 10: Requirements For State Registered Advisers.....	<del>67</del>

#### **Item 4: Services, Fees, and Compensation**

Accurate Wealth Management, LLC (hereinafter "AWM") provides portfolio management to clients under a wrap fee program, as described herein, as sponsor and portfolio manager. AWM is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. Additional information about Accurate Wealth Management, LLC is available on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Accurate Wealth Management, LLC's CRD number is 298137.

Portfolio management fees are withdrawn directly from the client's accounts with each client's written authorization.

Fees are paid quarterly in advance except where fees are paid annually in arrears for performance fee based accounts. The advisory fee is calculated using the value of the assets on the last business day of the prior billing period. Refunds for any fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check or return deposit back into the client's account.

Clients may terminate the agreement without penalty and receive a full refund of AWM's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days written notice.

#### ***Services, Fees and Compensation***

Fees are generally calculated based on assets under management and will not exceed 2.5%. Fees are negotiable.

The Adviser may receive performance-based fees with respect to certain strategies. The Adviser manages both accounts that are charged a performance fee and accounts that are not charged a performance fee. The Adviser may have an incentive to favor accounts that are charged a performance fee; however, the Adviser believes this does not create a conflict of interest because accounts that are charged a performance fee are not using the same strategy as those that are not charged a performance fee. Charging a performance fee may create an incentive for the Adviser to make investments that are riskier or more speculative than would be the case in the absence of a fee based on the performance of the Account.

The following are the fees applicable where we charge a performance-based fee: An annualized percentage of the net liquidation value of the portfolio is charged. A 20% performance fee is charged annually in arrears on a high-water mark basis. The term "high-water mark" means the highest value that an account has achieved on previous performance fee calculation dates. Performance-based fees are only payable if an accounts performance exceeds the high-water mark. A high-water mark ensures that if a manager loses money over a period, they must achieve investment returns above the high-water mark before receiving a performance-based fee. We share the performance-based fee with the Third Party Adviser.

The wrap fee program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

AWM will pay third party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.) for wrap fee portfolio management accounts. AWM will charge clients one fee and pay all transaction fees using the fee collected from the client. Accounts participating in the wrap fee program are not charged higher advisory

fees based on trading activity, but clients should be aware that AWM has an incentive to limit trading activities for those accounts, since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, fees associated with “step out” transactions if the account uses different custodians or broker-dealers, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Tax and trust service fees are not included.

AWM uses the brokerage and custody services of Schwab Advisor Services, a division of Charles Schwab & Co., an unrelated registered broker-dealer and member of FINRA/SIPC. Schwab has eliminated commissions for online trades of equities, ETFs and options (subject to a per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab. We encourage you to review Schwab’s pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab’s most recent pricing schedules available at [schwab.com/aspricingguide](http://schwab.com/aspricingguide).

Our firm receives certain economic benefits from custodians in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at the custodians. These products and services, how they benefit AWM and the related conflicts of interest are described in our Firm brochure (*see Item 14 of the Firm brochure*). The availability of such products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

Neither AWM, nor any representatives of AWM receive any additional compensation beyond advisory fees for the participation of clients in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, AWM may have a financial incentive to recommend the wrap fee program to clients.

## **Item 5: Account Requirement and Types of Clients**

We offer our services to individuals, high net worth individuals, pension and profit sharing plans, charities, corporations, and other business entities. We do not require a minimum account size or place any restrictions on opening an account.

## **Item 6: Portfolio Manager Selection and Evaluation**

AWM will select and periodically review outside Third Party Advisers for management of this wrap fee program based upon criteria including historical performance, lack of disciplinary history, management stability and depth, and ability to match our asset allocation needs. AWM will use industry standards to calculate Third Party Advisers performance.

AWM reviews the performance information to determine and verify its accuracy and compliance with presentation standards by utilizing vendor software and conducting a supervisory review of sample client accounts.

AWM and its personnel serve as the portfolio managers for all wrap fee program accounts.

AWM offers ongoing wrap fee portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AWM creates a suitability profile 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:

- Determine investment strategy
- Asset allocation
- Assessment of risk tolerance
- Personal investment policy
- Asset selection
- Periodic portfolio review

AWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon.

Portfolio management accounts participating in the wrap fee program will not have to pay for transaction or trading fees. AWM will charge clients one fee and pay transaction fees using the advisory fee collected from the client. Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that AWM has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, AWM will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

***Services Limited to Specific Types of Investments***

AWM generally limits its investment advice to mutual funds, equities, bonds, fixed income, debt securities, ETFs real estate, hedge funds, REITs, insurance products including annuities, private placements (including, in appropriate circumstances, structured notes, private equity funds, hedge funds and privately placed life insurance contracts), and government securities. AWM may use other securities, as well to help diversify a portfolio when applicable.

***Wrap Fee Programs***

As discussed herein, AWM acts as manager for this wrap fee program. AWM manages the investments in the wrap fee program in the same way in which it manages non-wrap fee accounts.

***Amounts Under Management***

AWM has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$780,485,662	0	February 29, 2024

**Item 7: Client Information Provided to Portfolio Managers**

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is gathered by the Adviser in its capacity as portfolio manager and is updated periodically and in the event of material changes.

**Item 8: Client Contact with Portfolio Managers**

AWM does not restrict clients from contacting portfolio managers.

**Item 9: Additional Information Managers**

Addressed in Firm brochure.

**Item 10: Requirements For State Registered Advisers**

Not applicable.