

Form ADV Part 2A: Firm Brochure

Item 1 – Cover Page

Shield Wealth Advisors, LLC.

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Date of Disclosure Brochure: July 2021

This disclosure brochure provides information about the qualifications and business practices of Shield Wealth Advisors, LLC. (also referred to as we, us and Shield Wealth Advisors throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact John W. Haberstro at 833-457-1040 or jhaberstro@shield457.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Shield Wealth Advisors is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Shield Wealth Advisors, LLC. or our firm's CRD number 309538.

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

Item 2 – Material Changes

Since our last required annual amendment to this disclosure brochure was filed in February 2021, we have made the following material changes:

- The firm has expanded the Risk disclosure language contained in **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.**
- The firm updated its assets under management, please refer to **Item 4 – Advisory Business** for more specific information.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes, as necessary.

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Item 4 – Advisory Business

Shield Wealth Advisors is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company (LLC) formed under the laws of the State of New York.

- John W. Haberstro is the Managing Member and 100% owner of Shield Wealth Advisors.
- Shield Wealth Advisors was approved as a registered investment adviser in July 2020.

Introduction

The investment advisory services of Shield Wealth Advisors are provided to you through an appropriately licensed individual who is an investment adviser representative of Shield Wealth Advisors (referred to as your investment adviser representative throughout this brochure).

Description of Advisory Services

The following are descriptions of the primary advisory services of Shield Wealth Advisors. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Shield Wealth Advisors before we can provide you the services described below.

Asset Management Services – Shield Wealth Advisors offers asset management services, which involves Shield Wealth Advisors providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the “Account”). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to

you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

Sub Advisor Program - Shield Wealth Advisors also offers programs that allows Shield Wealth Advisors to select third-party non-affiliated investment managers ("Sub Advisors") to design and manage model portfolios for your assets.

We will assist you in completing a client profile questionnaire and review the information you provide. We will then select a Sub Advisors and corresponding model portfolio that aligns with your disclosed risk tolerance and investment objectives. Currently we utilize the services of Hudson Capital Advisory, Inc. to act in the capacity as sub advisor for our client managed accounts. As a sub advisor Hudson will require access to Shield Wealth's client personal, financial and investment portfolio information and has agreed to maintain mutual fund focus and buy lists, asset allocations, participation in client meetings, and assistance in implementing firm trading activities.

These Sub Advisors follow certain parameters when building and managing a model portfolio the sub advisor will be given discretionary authority to select the specific investments for your account based on information and/or signals provided by the Sub Advisors; we will not have discretionary authority to select any specific funds for your account under this program. The sub advisor will implement the model for your account by acquiring the fund shares that are represented in the selected model portfolios. We will be available to answer questions that you may have regarding your account and act as the communication conduit between you and the Sub Advisors. We have the ability to hire and fire the Sub Advisors as well as the ability to reallocate funds from or to the model portfolio managed by the Sub Advisors and funds in other accounts over which you have granted us discretionary authority.

You should be aware that there may be other sub advisory programs not recommended by our firm, that are suitable for you and that may be less costly than arrangements recommended by our firm. No guarantees can be made that your financial goals or objectives will be achieved through the managed account program or by a selected Sub Advisor. Further, no guarantees of performance can ever be offered by our firm (*Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.*)

Retirement Plan Rollover Partial Lump Sum Distribution Recommendations

When Shield Wealth Advisors provides investment advice about your retirement plan account or individual retirement account ("IRA") including whether to maintain investments and/or proceeds in the retirement plan account, roll over such investment/proceeds from the retirement plan account to a IRA or make a distribution from the retirement plan account, we acknowledge that Shield Wealth Advisors is a "fiduciary" within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA")

and/or the Internal Revenue Code (“IRC”) as applicable, which are laws governing retirement accounts. The way Shield Wealth Advisors makes money creates conflicts with your interests so Shield Wealth Advisors operates under a special rule that requires Shield Wealth Advisors to act in your best interest and not put our interest ahead of you.

Under this special rule’s provisions, Shield Wealth Advisors must as a fiduciary to a retirement plan account or IRA under ERISA/IRC:

- Meet a professional standard of care when making investment recommendations (e.g., give prudent advice);
- Never put the financial interests of Shield Wealth Advisors ahead of you when making recommendations (e.g., give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Shield Wealth Advisors gives advice that is in your best interest;
- Charge no more than is reasonable for the services of Shield Wealth Advisors; and
- Give Client basic information about conflicts of interest.

To the extent We recommend you roll over your account from a current retirement plan account to an individual retirement account managed by Shield Wealth Advisors, please know that Shield Wealth Advisors and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to an IRA managed by Shield Wealth Advisors. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to an IRA managed by Shield Wealth Advisors.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to an IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in Shield Wealth Advisors receiving unreasonable compensation related to the rollover of funds from the retirement plan to an IRA, and (iii) fully disclose compensation received by Shield Wealth Advisors and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to an IRA and refrain from making any materially misleading statements regarding such rollover.

When providing advice to you regarding a retirement plan account or IRA, our investment advisor representatives will act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk,

tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of Shield Wealth Advisors or our affiliated personnel.

Financial Planning & Consulting Services - Shield Wealth Advisors offers financial planning services, which involve preparing a written financial plan covering specific or multiple topics. We provide full written financial plans, which typically address the following topics: Investment Planning, Retirement Planning, Portfolios Review, Asset Allocation, Risk management, and Estate Planning. When providing financial planning and consulting services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. Written financial plans prepared by us do not include specific recommendations of individual securities.

We also offer consultations in order to discuss financial planning issues when you do not need a written financial plan. We offer a one-time consultation, which covers mutually agreed upon areas of concern related to investments or financial planning. We also offer "as-needed" consultations, which are limited to consultations in response to a particular investment or financial planning issue raised or request made by you. Under an "as-needed" consultation, it will be incumbent upon you to identify those particular issues for which you are seeking our advice or consultation on.

Our financial planning and consulting services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning and consulting recommendations. To the extent that you would like to implement any of our investment recommendations through Shield Wealth Advisors or retain Shield Wealth Advisors to actively monitor and manage your investments, you must execute a separate written agreement with Shield Wealth Advisors for our asset management services.

Limits Advice to Certain Types of Investments

Shield Wealth Advisors provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Foreign Issues
- Corporate Debt Securities
- Commercial Paper
- Certificates of Deposit
- Municipal Securities
- Options contracts on securities
- Real Estate Investment Trusts (REITS)
- US Government Securities

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Shield Wealth Advisors' advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. Our financial planning and consulting services are always provided based on your individual needs. When providing financial planning and consulting services, we work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Client Assets Managed by Shield Wealth Advisors

As of December 31, 2020, Shield Wealth manages \$31,650,695.00 in total assets, all on a discretionary basis.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Shield Wealth Advisors.

Asset Management Services

Fees charged for our asset management services are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a monthly basis and calculated based on the average daily balance of your account during the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The asset management services continue in effect until terminated by either party (i.e., Shield Wealth Advisors or you) by providing written notice of termination to the other party. When fees are billed in arrears, Shield Wealth Advisors will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

Fees charged for our asset management services are negotiable based on the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, and the relationship of the client with the investment adviser representative.

For our asset management services, clients will be charged an annual fee based upon the amount of assets under management. Each asset tier shall be assessed a fee percentage in accordance with the schedule shown below. The cumulative fee percentage for the account shall be a blended rate based on the fee percentages applied to each asset tier:

| <u>Assets Under Management</u> | <u>Annual Fees</u> |
|--------------------------------|--------------------|
| \$0 – \$400,000 | 1.500% |
| \$400,001 – \$750,000 | 1.250% |
| \$750,001 – \$1,000,000 | 1.000% |
| Above \$1,000,000 | Negotiable |

There is a minimum account size of \$100,000. To reach this account minimum, clients can aggregate all household or related family accounts.

Shield Wealth Advisors believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

The investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You will authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to our firm.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Brokerage expenses and/or transaction fees charged by the qualified custodian are billed directly to you by the qualified custodian. Shield Wealth Advisors does not receive any portion of such commissions or fees from you or the qualified custodian. In addition, you will incur certain charges imposed by third parties other than Shield Wealth Advisors in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by Shield Wealth Advisors are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

Sub-Advisor Managed Account Program

Fees for services provided through the sub advisor managed account program are charged based on a percentage of assets under management paid monthly, in arrears, based upon the average daily balance of the assets during the previous quarter. In the event of termination of this Agreement, the fee collected in advance, as described above, will be prorated based on the number of days elapsed in the current quarter and the remaining portion of the fee collected in advance will be refunded by to the client. No increase in the annual fee percentage shall be effective without prior written notification to the client.

The services under this program continue in effect until terminated by either party (i.e., Shield Wealth Advisors, Sub-Advisor or you) by providing written notice of termination to the other parties. Any prepaid, unearned fees will be promptly refunded by to you. If services are terminated at any time other than the last business day of the month, fees for the final billing period will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees for services provided through the Sub-Advisor Managed Account Program are negotiable based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment adviser representative, the total amount of assets under management for the client, and the Sub Advisor chosen.

The annual fee for Sub-Advisor Program asset management services will also be based upon the fee schedule referenced above, the sub advisor asset management fee is included in the fee charged by Shield Wealth Advisor and will not increase the asset management fees charged to our clients..

The annual fee to be charged will be specified in the client's agreement with Shield Wealth Advisors.

Shield Wealth Advisors believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

Fees for services provided through the Sub Advisor Managed Account Program will be deducted from your account by the qualified custodian(s), split between Sub Advisor and Shield Wealth Advisors, and the respective share of such fees will be paid directly to each firm by the qualified custodian(s) of your account. You must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Sub Advisor and Shield Wealth Advisors. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Services through the Sub Advisor Managed Account Program is not a wrap fee program therefore, the qualified custodian will charge a separate commission, ticket charge or fee for executing a securities transaction in addition to the investment advisory fee. Shield Wealth Advisors does not receive any portion of such commissions, ticket charges or custodial fees from the qualified custodian. If you choose the wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge or custodial fee for the execution of transactions in your account.

In addition to the fees described above, you may incur certain charges imposed by third parties in connection with investments made through your account including, but not limited to, ETF sales loads and management fees, sales charges and management fees for alternative investments, mutual fund sales loads, periodic mutual fund fees (e.g. 12b-1 trails) and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

Financial Planning & Consulting Services

Fees charged for our financial planning and consulting services are negotiable based upon the services requested, the complexity of the client's situation, the composition of the client's account, other advisory services provided and the relationship of the client and the investment adviser representative. The following are the fee arrangements available for financial planning and consulting services offered by Shield Wealth Advisors.

Fees for Financial Planning Services

Shield Wealth Advisors provides financial planning services under an hourly fee arrangement. An hourly fee of \$150.00 per hour is charged by Shield Wealth Advisors for financial planning services under this arrangement. Before commencing financial planning services, Shield Wealth Advisors provides an estimate of the approximate hours needed to complete the requested financial planning services. If Shield Wealth Advisors anticipates exceeding the estimated amount of hours required, Shield Wealth Advisors will contact you to receive authorization to provide additional services. You will pay in advance a mutually agreed upon retainer that will be available for Shield Wealth Advisors to bill hourly fees against for our financial planning services; however, under no circumstances will Shield Wealth Advisors require you to pay fees more than \$1,200 more than six months in advance. The standard billing dates and events of Shield Wealth Advisors are the following: (1) the first business day of each month; (2) the date when incurred hourly fees and expenses will cause the retainer balance to be depleted to zero; (3) the date or thereafter that Shield Wealth Advisors substantially provides the agreed upon services; and (4) the date the engagement is terminated by either you or Shield Wealth Advisors. Upon presentment of the invoice to you, Shield Wealth Advisors will deduct the hourly fees due Shield Wealth Advisors against your current retainer balance and you are required to pay immediately Shield Wealth Advisors any outstanding balance of hourly fees due.

The fees for the financial planning services may be waived by Shield Wealth Advisors at our sole discretion.

Shield Wealth Advisors only provides financial planning and consulting services to clients who are currently receiving asset management services from Shield Wealth Advisors for an asset management fee. If Client is currently receiving asset management services from Shield Wealth Advisors for an asset management fee, Shield Wealth Advisors waives any fees for services under this Agreement.

Although Shield Wealth Advisors is not charging investment advisory fees under this Agreement, there are fees and expenses charged by mutual funds to their shareholders if Client invests in mutual funds due in part to the services under this Agreement. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a

possible distribution fee (known as 12(b)-1 fees). If the mutual fund also imposes sales charges, Client may pay an initial or deferred sales charge.

Likewise, although Shield Wealth Advisors is not charging investment advisory fees under this Agreement, if Client decides to invest through a qualified custodian due in part to the services under this Agreement, the qualified custodian or broker-dealer executing certain transaction will charge commissions for implementing transactions.

The financial planning services terminate upon either party providing written notice of termination to the other party.

If you terminate the financial planning services after entering into an agreement with us, you will be responsible for immediate payment of any financial planning services performed by Shield Wealth Advisors prior to the receipt by Shield Wealth Advisors of your notice of termination. For financial planning services performed by Shield Wealth Advisors under an hourly arrangement, you will pay Shield Wealth Advisors for any hourly fees incurred at the rates described above. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Shield Wealth Advisors to you.

Fees for Consulting Services

Shield Wealth Advisors provides consulting services under an hourly fee arrangement. An hourly fee of \$150.00 per hour is charged by Shield Wealth Advisors for consulting services. Before providing consulting service, Shield Wealth Advisors will provide an estimate of the approximate hours needed to complete the consulting services. If Shield Wealth Advisors anticipates exceeding the estimated amount of hours required, Shield Wealth Advisors will contact you to receive authorization to provide additional services. You may be requested to pay in advance a mutually agreed upon retainer that will be available for Shield Wealth Advisors to bill hourly fees against for our consulting services; however, under no circumstances will Shield Wealth Advisors require you to pay fees more than \$1,200 more than six months in advance. Any unpaid hourly fees will be due immediately upon completion of the consulting services. The standard billing dates and events of Shield Wealth Advisors are the following: (1) the first business day of each month; (2) the date when incurred hourly fees will cause the retainer balance to be depleted to zero; (3) the date or thereafter that Shield Wealth Advisors substantially provides the agreed upon services; and (4) the date the engagement is terminated by either you or Shield Wealth Advisors. Upon presentment of the invoice to you, Shield Wealth Advisors will deduct the hourly fees due Shield Wealth Advisors against your current retainer balance and you will immediately pay Shield Wealth Advisors any outstanding balance of hourly fees due.

At our discretion, Shield Wealth Advisors may offer to waive the fees for certain consulting services.

The one-time consulting services will terminate upon completion of the consultation or either party providing the other party with written notice. The "as-needed" consulting services will terminate upon either you or Shield Wealth Advisors providing written notice of termination to the other party.

If you terminate the consulting services after entering into an agreement with Shield Wealth Advisors, you will be responsible for immediate payment of any consulting work performed by Shield Wealth Advisors prior to the receipt by Shield Wealth Advisors of your notice of termination. For consulting services performed by Shield Wealth Advisors under an hourly arrangement, you will pay Shield Wealth Advisors for any hourly fees incurred at the rates described above. In the event that there is a remaining balance

of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Shield Wealth Advisors to you.

Other Fee Terms for Financial Planning & Consulting Services

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly (for example, by check) or having the fee deducted from an existing investment account.

If you elect to pay by automatic deduction from an existing investment account, you will provide written authorization to Shield Wealth Advisors for such charge.

You should notify Shield Wealth Advisors within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent Shield Wealth Advisors engages an outside professional (i.e. attorney, independent investment adviser or accountant) while providing financial planning and consulting services to you, Shield Wealth Advisors will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse Shield Wealth Advisors for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and Shield Wealth Advisors will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e. attorney, independent investment adviser or accountant) will be in addition to and separate from the fees charged by Shield Wealth Advisors, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

If you retain Shield Wealth Advisors to implement the recommendations provided under this service, Shield Wealth Advisors may recommend load or no-load mutual funds that charge you 12(b)-1 fees. Your investment adviser representative may receive a portion of these 12(b)-1 fees in his or her separate capacity as a registered representative of a securities broker-dealer. The receipt of 12(b)-1 fees could represent an incentive for Shield Wealth Advisors or your investment adviser representative to recommend mutual funds with 12(b)-1 fees or higher 12(b)-1 fees over mutual funds with no 12(b)-1 fees or lower 12(b)-1 fees and therefore creates a conflict of interest.

All fees paid to Shield Wealth Advisors for financial planning and consulting services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

If you elect to implement the recommendations of Shield Wealth Advisors through our other investment advisory programs, Shield Wealth Advisors may waive or reduce a portion of the investment advisory fees for such investment advisory program(s). Any reduction will be at the discretion of your investment adviser representative and disclosed to you prior to contracting for additional investment advisory services.

It should be noted that lower fees for comparable services may be available from other sources.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Shield Wealth Advisors generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals

You are required to execute a written agreement with Shield Wealth Advisors specifying the particular advisory services in order to establish a client arrangement with Shield Wealth Advisors.

Minimum Investment Amounts Required

Shield Wealth Advisors requires a minimum of \$100,000 in order to open an account. To reach this account minimum, clients can aggregate all household or related family accounts.

The minimum fee generally charged for financial planning services provided on an hourly basis can range between \$50.00 to \$150.00 per hour depending upon the services rendered.

The minimum hourly fee generally charged for consulting services can range between \$50.00 to \$150.00 per hour depending upon the services rendered.

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

Methods of Analysis

Shield Wealth Advisors uses the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

In the development and management of our Shield Wealth Advisor's Investment Committee (Committee) utilizes a combination of internal research and the use of research services provided under an agreement with unaffiliated investment advisory firms. The use of external research services will not increase the asset management fees charged to our clients.

There are risks involved in using any analysis method.

Investment Strategies

Shield Wealth Advisors uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Value Investing. We primarily follow a value-investing strategy that attempts to acquire at reasonable valuations publicly traded businesses that can deliver sustainable excess returns. We focus on a long-only strategy. Long term strategies are designed to identify and select investments to be held for multiple years. We will also invest in value oriented special situations with shorter expected holding periods.

Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e. businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Primarily Recommend One Type of Security

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk:** Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk:** Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk:** When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Fixed Income Risk:** When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **Options Risk:** Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **ETF and Mutual Fund Risk:** When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- **Management Risk:** Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If

our investment strategies do not produce the expected returns, the value of the investment will decrease.

- **Digital Asset Risk:** Digital assets (e.g. cryptocurrencies) have unique risks as it is a new and unproven technology and investment category. Risks include extreme volatility, potential for a full loss of capital, technology issues that result in wallets being hacked and funds lost as well as regulatory and tax uncertainties. Given the Risk associated with Digital Assets, Shield Wealth Advisors, LLC only invests in these investments through SEC registered securities, utilizing Exchange Traded Funds and Open End Funds. Shield Wealth Advisors, LLC does not hold individual coins nor will they have access to client's digital wallets.

Outbreaks of Communicable Infections or Diseases. Disease outbreaks and other public health conditions, such as the global outbreak of the novel COVID-19 ("coronavirus") currently being experienced, in markets in which Shield Wealth Advisors has made and will continue to make investments, can have a significant negative impact on certain investments. Global financial markets, which includes U.S. markets, have begun to reflect the uncertainty associated with the slowdown in the economy and the potential impact if businesses, workers, customers and others are prevented or restricted from conducting business activities due to quarantines, business closures or other restrictions imposed by businesses or governmental authorities in response to the coronavirus outbreak. This could result in an economic downturn and cause market disruption which negatively impacts to the Shield Wealth Advisors' investments.

The imposition of international and domestic travel restrictions and the potential disruption to the Shield Wealth Advisors' business if Shield Wealth Advisors' employees are subject to quarantine, contract coronavirus, or are otherwise unable to work due to restrictions related to the coronavirus outbreak could negatively impact Shield Wealth Advisors' business and could have a material adverse effect on the Shield Wealth Advisors' ability to manage client assets. Due to the significant disruptions resulting from the risks described above, the Shield Wealth Advisors has a business continuity plan that has been implemented, pursuant to which personnel will work from home or remote locations. The Shield Wealth Advisors believes that it has taken and will continue to take all necessary actions pursuant to its business continuity plan, but Shield Wealth Advisors will have increased exposure to such disruptions. Shield Wealth Advisors will monitor all these potential issues in order to ensure that Shield Wealth Advisors' business continues as normal to the greatest extent possible and the health and safety of its employees, clients, service providers and principals are given the highest priority.

Important Information Concerning Alternative Investment Strategies

As a registered investment advisor, Shield Wealth Advisors and its investment advisor representatives may only offer alternative investment products that are offered on a "RIA Only" only basis. No sales based compensation (commission) is paid on these types of investments.

Investment Adviser Representatives may only offer alternative investment products that have been reviewed and approved by the firm's investment committee.

Alternative Investments are privately offered investment vehicles that are unregistered private investment funds or pools that may invest in many different markets, strategies and instruments (including securities, non-securities and derivatives) and are NOT subject to the same regulatory requirements as mutual

funds, including mutual fund requirements to provide certain periodic and standardized pricing and valuation information to investors. There are substantial risks in investing in Alternative Investments.

- Alternative Investments are **speculative** investments that involve a high degree of risk. An investor could lose all or a substantial portion of his/her investment. Investors must have the financial ability, sophistication/experience and willingness to bear the risks of an investment in an Alternative Investment.
- An investment in an Alternative Investment is typically **illiquid** in nature and there will be significant restrictions on liquidating or transferring interests in an Alternative Investment. There is currently no established secondary market for an investor's investment in an Alternative Investment and none is expected to develop.
- Any investment in Alternative Investment should be discretionary capital set aside strictly for long term **speculative** purposes.
- An investment in an Alternative Investment is not suitable or desirable for all investors. Only qualified eligible investors may invest in Alternative Investments.
- Alternative Investment offering documents are not reviewed or approved by federal or state regulators and the offering of fund interests will not be federally, or state registered.
- Some Alternative Investments may have little or no operating history or performance and may use hypothetical or pro-forma performance which may not reflect actual trading done by the manager or advisor and should be reviewed carefully. Investors should not place undue reliance on hypothetical or pro-forma performance.
- An Alternative Investment's manager or advisor has total discretionary authority over the activities of the Alternative Investment.
- Alternative Investments are not required to provide periodic pricing or valuation information to investors.
- Some Alternative Investments may provide little or no transparency regarding their underlying investments to investors.
- Alternative Investments which make private equity investments have certain different risks, generally including, among other things, no or limited redemption rights; illiquid portfolios and valuation difficulties; asset, market or industry concentration; portfolio company risks including competition and fluctuating distributions; operational and control risks including "key-man" risk; particular industry risks including retail business risks; and financing or additional funding risks.
- An Alternative Investment's fees (including advisory fees and placement agent, distribution and/or portfolio acquisition fees) and expenses, which may be substantial regardless of any positive return, will offset the Alternative Investment's investment profits. If an Alternative Investment's investments are not successful, these payments and expenses may, over a period, deplete the net asset value of the fund.
- Alternative Investment Funds may be leveraged (including highly leveraged), which increases risk, and an Alternative Investment Fund's performance may be volatile.
- Some Alternative Investment Funds may use a single advisor or employ a single strategy, which could mean a lack of diversification and higher risk.

- Some Alternative Investment Funds and their advisors rely on the investment expertise and experience of third-party advisors, the identity of which may not be disclosed to investors.
- Alternative Investment Funds and their managers/advisors may be subject to various conflicts of interest, including with respect to decisions which may affect their compensation.
- The net asset value of an Alternative Investment Fund may be determined by its administrator and/or its manager. Certain portfolio assets may be illiquid and without a readily ascertainable market value. The value assigned to such securities may differ from the value an Alternative Investment Fund is able to realize. Instances of mispriced portfolios, due to fraud or negligence, have occurred in the industry.
- Some Alternative Investment Funds may enter swaps, futures, forwards, options and other derivative transactions for various hedging and/or speculative purposes that can result in more volatile fund performance.
- Some Alternative Investment Funds may trade commodity interests or may execute a substantial portion of trades on foreign exchanges, which may increase risk of loss and material economic conditions and/or events may affect future results.
- Some Alternative Investment Funds may involve complex tax structures, which should be reviewed carefully.
- Some Alternative Investment Funds may involve structures or strategies that may cause delays in important tax information being sent to investors.

This summary of certain risks is not a complete list of the risks and other important disclosures involved in investing in an Alternative Investment is subject to the more complete disclosures, including risk factors, contained in a specific Alternative Investment's respective offering documents, which must be reviewed carefully. An Alternative Investment's past performance is not indicative and is no guarantee of its future performance.

Due to the unique structure of fee-based Alternative Investment products, the account custodian holding, monitoring and providing reporting services for a non-traded alternative investment vehicle may charge a service fee to the client's account. Different custodians may charge different fees for providing such monitoring and reporting services. This fee may be waived at the sole discretion of the advisor. Factors in determining if services fees will be waived for a particular client may include the market value of the client's assets being managed, complexity of the client's portfolio, the client's financial situation, level of portfolio trading activity, anticipated future assets, the relationship of the client to the advisor, and additional services requested or performed for the client. Fee waivers or discounts which are not available to clients may also be available for the Owners, Directors, Officers and Associated Persons of Shield Wealth Advisors and our related companies as well as to family members and friends of associated persons of Shield Wealth Advisors. If fees are waived for a client, the investment advisor representative may pay the service fee on behalf of the client. The ability to waive the imposition of these service fees creates a conflict of interest because the investment advisor representative may waive the service fee for a client and may not waive the service fee for another client, in the advisor's sole discretion.

The relevant information, terms and conditions of an investment in a particular alternative investment, including the management fee to be paid to the manager, suitability considerations, the investment strategy and risk factors, are described in the Alternative Investment's offering documents. Those

documents include the Private Offering memorandum, Partnership Agreement, Subscription Agreement and other important materials or forms, which each subscriber is required to receive and/or execute prior to being accepted as an investor of the Alternative Investment.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Shield Wealth Advisors is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure.

Insurance Agent

You may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of Shield Wealth Advisors by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

Accounting Services

Dawn Robinson, an associated person of Shield Wealth Advisors, is an Enrolled Agent and the owner of Robinson Tax. Clients needing assistance with tax preparation and/or account services may be referred to her. A conflict of interest exists whenever there is a recommendation to utilize the accounting services of our representatives. Clients are not required to utilize the accounting services of our representatives Dawn Robinsons' services and are free to use any accounting service provider they choose.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

According to the *Investment Advisers Act of 1940*, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Shield Wealth Advisors has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the *Investment Advisers Act of 1940* that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The Code of Ethics covers all individuals that are classified as “supervised persons”. All employees, officers, directors and investment adviser representatives are classified as supervised persons. Shield Wealth Advisors requires its supervised persons to consistently act in your best interest in all advisory activities. Shield Wealth Advisors imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Shield Wealth Advisors. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Shield Wealth Advisors or supervised persons of the firm buy and sell for their personal accounts, investment products identical to those recommended to clients. This creates a conflict of interest. It is the express policy of Shield Wealth Advisors that all persons associated in any manner with our firm must place clients’ interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, Shield Wealth Advisors and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To mitigate conflicts of interest that can occur when access persons manage their personal accounts at the same time Shield Wealth Advisors manages client accounts, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, supervised persons):

- Supervised persons cannot prefer their own interests to that of the client.
- Supervised persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Supervised persons cannot recommend that a client rollover their retirement account or request the transfer of a partial lump sum distribution payment into a managed account if that transaction is not in the best interest of the client.
- Supervised persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment unless that information is also available to the investing public upon reasonable inquiry.
- Supervised persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider”.

- Supervised persons are discouraged from conducting frequent personal trading.
- Supervised persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Shield Wealth Advisors.

Any Supervised person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

If Shield Wealth Advisors assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

Brokerage Recommendations

Shield Wealth Advisors may recommend/require that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc (“Schwab”), a FINRA-registered broker-dealer, Member SIPC, to maintain custody of clients’ assets and to effect trades for their accounts. Although Shield Wealth Advisors may recommend/require the clients establish accounts at Schwab, it is the client’s decision to custody assets with Schwab. Shield Wealth Advisors is independently owned and operated and not affiliated with Schwab. Shield Wealth Advisors may recommend additional unaffiliated broker-dealers to affect fixed income transactions.

Schwab provides Shield Wealth Advisors with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor’s clients’ assets are maintained at Schwab Institutional. These services are not contingent upon Shield Wealth Advisors committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab’s brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are

otherwise generally available only to institutional investors or would require significantly higher minimum initial investment.

Schwab Institutional also makes available to Shield Wealth Advisors other products and services that benefit Shield Wealth Advisors but may not directly benefit clients' accounts. Many of these products and services may be used to service all or some substantial number of Shield Wealth Advisors' accounts, including accounts not maintained Schwab.

Schwab's products and services that assist Shield Wealth Advisors in managing and administering clients' accounts include software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Shield Wealth Advisors' fees from some of its accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help Shield Wealth Advisors manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third-party providing these services to Shield Wealth Advisors. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of Shield Wealth Advisors personnel. While as a fiduciary, Shield Wealth Advisors endeavors to act in its clients' best interests, Shield Wealth Advisors' recommendation that clients maintain their assets in accounts at Schwab may take into account availability of some of the foregoing products and services and other arrangements not solely on the nature of cost or quality of custody and brokerage services provided by Schwab, which may create a conflict of interest.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, Shield Wealth Advisors may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Shield Wealth Advisors has decided to require our clients to use broker/dealers and other qualified custodians determined by Shield Wealth Advisors.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Shield Wealth Advisors does not have a soft dollar agreement with a broker-dealer or a third-party.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Shield Wealth Advisors believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Shield Wealth Advisors uses the average price allocation method for transaction allocation.

Under this procedure Shield Wealth Advisors will calculate the average price and transaction charges for each transaction included in a block order and assign the average price and transaction charge to each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which Shield Wealth Advisors or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by John W. Haberstro, with reviews performed in accordance with your investment goals and objectives.

Our financial planning and consulting services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements in writing directly from the qualified custodian. Additionally, Shield Wealth Advisors may provide position or performance reports to you **semi-annually** and upon request.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by Shield Wealth Advisors.

You are encouraged to always compare any reports or statements provided by us against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Shield Wealth Advisors does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Shield Wealth Advisors receives no other forms of compensation in connection with providing investment advice.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see *Item 12 – Brokerage Practices*). The availability of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.

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 adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Shield Wealth Advisors is deemed to have custody of client funds and securities whenever Shield Wealth Advisors is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Shield Wealth Advisors will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Shield Wealth Advisors is deemed to have custody, we have 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 Shield Wealth Advisors. When clients have questions about their account statements, they should contact Shield Wealth Advisors or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

When providing asset management services, Shield Wealth Advisors maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Shield Wealth Advisors so long as the limitations are specifically set forth or included as an attachment to the client agreement.

You will grant Shield Wealth Advisors discretionary authority (without first consulting with Client) to establish and/or terminate a relationship with a Sub-Adviser for purposes of managing the Account or a portion of the Account determined by Shield Wealth Advisors. Client will also grant the Sub-Adviser selected by Shield Wealth Advisors with the discretionary authority (in the sole discretion of the Sub-Adviser without first consulting with Client) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the Account managed by the Sub-Adviser. Client will also grant the Sub-Adviser selected by Shield Wealth Advisors with the power and authority to carry out these decisions by giving instructions, on behalf of Client, to brokers and dealers and the qualified custodian(s) of the Account. Client authorizes Shield Wealth Advisors to provide a copy of this Agreement to the qualified custodian or any broker or dealer, through which transactions will be implemented on behalf of Client, as evidence of Sub-Advisor's authority under this Agreement.

Item 17 – Voting Client Securities

Shield Wealth Advisors does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Shield Wealth Advisors does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Shield Wealth Advisors has not been the subject of a bankruptcy petition at any time.

Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Shield Wealth Advisors does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Shield Wealth Advisors is committed to safeguarding the confidential information of its clients. Shield Wealth Advisors holds all personal information provided by clients in the strictest confidence and it is the objective of Shield Wealth Advisors to protect the privacy of all clients. Except as permitted or required by law, Shield Wealth Advisors does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, Shield Wealth Advisors will provide clients with written notice and clients will be provided an opportunity to direct Shield Wealth Advisors as to whether such disclosure is permissible.

To conduct regular business, Shield Wealth Advisors may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Shield Wealth Advisors
- Information about the client's transactions implemented by Shield Wealth Advisors or others
- Information developed as part of investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Shield Wealth Advisors to provide access to customer information within the firm and to nonaffiliated companies, with whom Shield Wealth Advisors has entered into agreements with. To provide the utmost service, Shield Wealth Advisors may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Shield Wealth Advisors' behalf.

- Information Shield Wealth Advisors receives from the client on applications (name, social security number, address, assets, etc.)

- Information about the client's transactions with Shield Wealth Advisors or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Shield Wealth Advisors

Since Shield Wealth Advisors shares nonpublic information solely to service client accounts, Shield Wealth Advisors does not disclose any nonpublic personal information about Shield Wealth Advisors' customers or former customers to anyone, except as permitted by law. However, Shield Wealth Advisors may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Shield Wealth Advisors has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Shield Wealth Advisors will allow its clients the opportunity to opt out of such disclosure.

Business Continuity Plan

Shield Wealth Advisors has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

Form ADV Part 2B: Brochure Supplement - John W. Haberstro

Item 1 – Cover Page

John W. Haberstro
Shield Wealth Advisors, LLC.
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
833-457-1040
www.shield457.com

Date of Supplement: July 2021

This brochure supplement provides information about John W. Haberstro that supplements the Shield Wealth Advisors, LLC. (“Shield Wealth Advisors”) disclosure brochure. You should have received a copy of that brochure. Please contact John W. Haberstro at 833-457-1040 or at jhaberstro@shield457.com if you did not receive Shield Wealth Advisors’ brochure or if you have any questions about the contents of this supplement.

Additional information about John W. Haberstro is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

John W. Haberstro

Born 1980; CRD # 4754069

Post-Secondary Educational Background:

Canisius College, Bachelor of Science in Finance: 2003
American College, Financial Planning Certificate: 2010

Business Background:

Shield Wealth Advisors, Managing Member, 07/2020 to Present;
Peak Brokerage Services, LLC, Representative, 09/2015 to 10/2020
NEXT Financial Group, Inc., Representative, 05/2012 to 09/2015

Item 3 – Disciplinary Information

John W. Haberstro has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Insurance Agent

John W. Haberstro is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, John W. Haberstro will receive commissions for selling insurance and annuity products.

John W. Haberstro may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect the judgment of John W. Haberstro when recommending products to its clients. While John W. Haberstro endeavors at all times to put the interest of his clients first as a part of Shield Wealth Advisors' overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect John W. Haberstro's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through John W. Haberstro and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

In addition to the description of additional compensation provided in Item 4, John W. Haberstro can receive additional benefits.

Certain product sponsors may provide John W. Haberstro with other economic benefits as a result of his recommendation or sale of the product sponsors' investments. The economic benefits received by John W. Haberstro from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist John W. Haberstro in providing various services to clients.

Although Shield Wealth Advisors and John W. Haberstro endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of John W. Haberstro when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including John W. Haberstro.

Item 6 – Supervision

Dawn Robinson is the Chief Compliance Officer of Shield Wealth Advisors. She is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including John W. Haberstro. Dawn Robinson can be contacted at 833-457-1040.

Form ADV Part 2B: Brochure Supplement - Dawn M. Robinson

Item 1 – Cover Page

Dawn M. Robinson
Shield Wealth Advisors, LLC.
2809 Wehrle Drive, Suite 9
Williamsville, NY 14221
833-457-1040
www.shield457.com

Date of Supplement: July 2021

This brochure supplement provides information about Dawn M. Robinson that supplements the Shield Wealth Advisors, LLC. (“Shield Wealth Advisors”) disclosure brochure. You should have received a copy of that brochure. Please contact John W. Haberstro at 833-457-1040 or at jhaberstro@shield457.com if you did not receive Shield Wealth Advisors’ brochure or if you have any questions about the contents of this supplement.

Additional information about Dawn M. Robinson is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Dawn M. Robinson

Born 1970; CRD # 6796722

Post-Secondary Educational Background:

Canisius College, BS in Accounting: 1992

Business Background:

Shield Wealth Advisors, Operations Manager/Chief Compliance Officer, 07/2020 to Present;
Robinson Tax Service, Owner and Enrolled Agent, 11/2017 to Present
WNY Safe Solutions Consulting, Inc., President, 10/2016 to Present
Independent Solutions Wealth Management, LLC, Investment Advisor Representative, 07/2017 to 09/2020
Argus Tax & Accounting, Tax Accountant, 09/2013 to 05/2017
Village of Lancaster, Trustee and Deputy Mayor, 11/2012 to 04/2019
Schlabach Enterprises, Inc., Tax Accountant, 12/2009 to 09/2013

Professional Designations

Enrolled Agent (EA)

An Enrolled Agent (EA) has earned the privilege of practicing (representing taxpayers) before the Internal Revenue Service (IRS). Candidates become Enrolled Agents by either passing a written examination or through IRS experience. Candidates taking the Special Enrollment Examination must achieve passing scores on all parts of the exam, apply for enrollment and pass a background check to ensure they have

not and are not engaged in any conduct that would justify suspension or disbarment of an attorney, Certified Public Accountant or Enrolled Agent from practicing before the IRS. Candidates can also become an Enrolled Agent by having (1) a minimum of 5 years continuous employment with the IRS in which they were regularly engaged in applying and interpreting provisions of the Internal Revenue Code and regulations relating to income, estate, gift, employment or excise taxes and (2) a minimum of 5 years continuous employment with the IRS in which they were regularly engaged in applying and interpreting regulations relating to qualified retirement plan matters. Candidates applying for enrollment by experience must also pass a background check.

Item 3 – Disciplinary Information

Dawn M. Robinson has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Dawn Robinson, an associated person of Shield Wealth Advisors, is an Enrolled Agent and the owner of Robinson Tax. Clients needing assistance with tax preparation and/or account services may be referred to her but are not obligated to use her services.

Item 5 – Additional Compensation

In addition to the description of additional compensation provided in Item 4, Dawn M. Robinson can receive additional benefits.

Certain product sponsors may provide Dawn M. Robinson with other economic benefits as a result of her recommendation or sale of the product sponsors' investments. The economic benefits received by Dawn M. Robinson from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist Dawn M. Robinson in providing various services to clients.

Although Shield Wealth Advisors and Dawn M. Robinson endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of Dawn M. Robinson when recommending investment products. These situations present a conflict of interest that may affect the judgment of affiliated persons including Dawn M. Robinson.

Item 6 – Supervision

Dawn M. Robinson is the Chief Compliance Officer of Shield Wealth Advisors. She is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Dawn M. Robinson can be contacted at 833-457-1040.