Item 1: Cover Page

This Firm Brochure (Form ADV Part 2A) provides information about the qualifications and business practices of Sand Run Wealth Management LLC. Please contact Alec Derrig, CPA, CFP®, Managing Member and Chief Compliance Officer, at 330-714-5297 or alec@sandrunwealth.com if you have any questions about the contents of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sand Run Wealth Management LLC is also available through the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Investing in securities involves risk of loss, including the possible loss of principal. Registration as an investment adviser does not imply a certain level of skill or training.

ADVISER INFORMATION

Sand Run Wealth Management LLC
Attn: Alec Derrig, CPA, CFP®
Managing Member & Chief Compliance Officer
232 Birdwood Rd
Akron, Ohio 44313
Phone: 330-714-5297
Email: alec@sandrunwealth.com
Website: www.sandrunwealth.com

CUSTODIAN INFORMATION

Charles Schwab & Co., Inc.
3000 Schwab Way
Westlake, Texas 76262
Phone: 800-435-4000
Website: www.schwab.com

Item 2: Material Changes

This is the initial Form ADV Part 2A Firm Brochure for Sand Run Wealth Management LLC. Accordingly, there are no material changes to report from a prior annual update.

Future annual updates will summarize material changes made to this brochure since the Firm's previous annual update. The Firm may also provide interim amendments when material information changes between annual updates.

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Sand Run Wealth Management LLC (“Sand Run,” “SRWM,” “we,” “us,” or the “Firm”) is an Ohio limited liability company organized in 2026. The Firm is owned and controlled by Alec Derrig, CPA, CFP®, who serves as Managing Member, Chief Compliance Officer, and Financial Advisor. SRWM provides investment management and financial planning services to individuals, families, and other clients. The Firm seeks to combine personalized advice with disciplined investment, financial planning, operational, and risk- management processes.

B. Types of Advisory Services

Investment Management

SRWM provides ongoing investment management services based on each client’s individual circumstances, objectives, financial condition, time horizon, liquidity needs, risk tolerance, tax considerations, and other relevant factors. Services may include:

- development of an investment strategy and appropriate asset allocation;
- selection, purchase, sale, and monitoring of investments;
- portfolio construction and implementation;
- portfolio rebalancing;
- ongoing review of investment accounts;
- cash management and liquidity planning relating to managed assets;
- tax-aware investment management;
- retirement portfolio and distribution planning; and
- coordination of investment decisions with the client’s broader financial circumstances.

Depending on the client’s needs, portfolios may utilize exchange-traded funds, mutual funds, individual equity securities, U.S. government and agency securities, corporate or municipal fixed-income securities, certificates of deposit, money market instruments, cash and cash equivalents, and other investments that SRWM determines are appropriate.

Financial Planning and Wealth Management

SRWM may provide comprehensive financial planning and wealth management services under a separate written planning engagement and for an additional fee as described in Item 5. These services are separate from the Firm's investment management fee unless specifically agreed otherwise in writing. Depending on a client's circumstances, planning may address:

- cash flow and net worth;
- retirement planning;
- investment planning;
- tax-aware financial planning;
- education funding;
- insurance needs and risk-management considerations;
- debt and financing decisions;
- charitable planning;
- business-owner financial considerations; and
- coordination with a client's attorneys, accountants, insurance professionals, and other advisers when appropriate.

SRWM does not provide legal services and does not prepare tax returns as part of its investment advisory services unless separately agreed and permitted. Clients should consult the appropriate professional when legal advice, tax return preparation, insurance implementation, or other specialized services are required. Clients are under no obligation to implement any recommendation made by SRWM.

Retirement Accounts and Rollover Recommendations

When a client leaves an employer or otherwise becomes eligible to move retirement plan assets, the client may have several alternatives, including leaving assets in the existing plan, moving assets to a new employer plan if permitted, rolling assets to an individual retirement account ("IRA"), or taking a taxable distribution. The appropriate choice depends on the client's individual circumstances.

If SRWM recommends that a client roll retirement plan assets to an IRA managed by SRWM, SRWM has a conflict of interest because the Firm may receive or increase advisory compensation as a result of the rollover. SRWM addresses this conflict by considering reasonably available alternatives and relevant factors, which may include fees and expenses, available investments and services, distribution options, creditor protection, convenience, and the client's financial circumstances. Clients are not obligated to complete a rollover or to manage rolled assets through SRWM.

C. Client-Tailored Services and Client-Imposed Restrictions

SRWM tailors advisory services to the individual needs of each client. Before implementing an investment strategy, SRWM obtains information concerning the client's financial circumstances, objectives, risk tolerance, time horizon, liquidity requirements, tax considerations, and other relevant factors. Clients may request reasonable written restrictions concerning investments in particular securities, industries, asset classes, or types of securities. SRWM may decline a requested restriction if it would materially impair the Firm's ability to manage the account effectively. Clients are responsible for promptly informing SRWM of material changes in their financial circumstances, investment objectives, or restrictions.

D. Wrap Fee Programs

SRWM does not sponsor a wrap fee program and does not currently manage client assets through a third-party wrap fee program.

E. Assets Under Management

As a newly formed investment adviser, SRWM had $0 of regulatory assets under management as of September 2026. This information will be updated as required as the Firm begins managing client assets.

Item 5: Fees and Compensation

A. Investment Management Fee Billing

SRWM charges an annual asset-based advisory fee of 1.00% of assets under management.

Total Assets Under Management	Annual Advisory Fee
All Managed Assets	1.00%

Advisory fees may be negotiated below the standard 1.00% annual fee in certain circumstances.

Fees are billed monthly in arrears based on the market value of managed assets as of the last business day of each month. Fees may be prorated or adjusted for partial billing periods and material contributions or withdrawals.

Illustrative Fee Calculation

A $100,000 account would incur an annualized advisory fee of approximately $1,000, or approximately $83.33 per month, assuming the account value remained unchanged.

B. Financial Planning Fees

Financial planning services are separate from SRWM's investment management services and are subject to an additional fee. Financial planning services are quoted in advance on a project-by-project basis. Fixed project fees generally range from $1,000 to $5,000. In developing each quote, SRWM generally estimates the time required using an hourly rate of $250 and considers the scope and complexity of the engagement, the client's financial circumstances, number and types of accounts, planning needs, and other relevant considerations.

The specific services and total fixed project fee will be agreed upon with the client in writing before services are performed. Financial planning fees are generally billed in arrears upon completion of the agreed services or according to another schedule agreed to in writing. If a financial planning engagement is terminated before completion, the client may be responsible for a prorated fee for services performed through the date of termination.

SRWM does not impose a minimum annual fee solely for investment-management-only clients.

C. Payment of Fees

With the client's written authorization, SRWM may deduct advisory fees directly from the client's custodial account. Clients may also pay advisory fees directly to SRWM when appropriate. Investment management fees are generally paid monthly in arrears. Financial planning fees are paid as described in the applicable financial planning engagement.

When an investment advisory relationship begins or terminates during a billing period, fees will generally be prorated for the portion of the period during which services were provided. Because SRWM generally bills in arrears, unearned prepaid asset-based advisory fees ordinarily should not arise.

D. Additional Fees and Charges

SRWM's advisory fee is separate from fees and expenses that may be charged by third parties. Clients may incur costs including brokerage or transaction charges, wire or account-service fees, mutual fund and exchange-traded fund operating expenses, management fees and other expenses of investment funds, markups, markdowns, bid-ask spreads, and other charges imposed by custodians, brokers, fund companies, or other third parties. These amounts are generally paid directly to the applicable third party and are not retained by SRWM.

Certain securities transactions may be available without a separate brokerage commission, but commission-free trading does not mean that all investment or account costs are eliminated. Clients should review the applicable custodian and investment product disclosures for additional information.

E. Prepayment of Fees

SRWM generally bills advisory fees in arrears and does not require or solicit prepayment of more than $1,200 in fees per client six months or more in advance.

F. Outside Compensation for the Sale of Securities or Investment Products

Neither SRWM nor its supervised persons receives commissions, 12b-1 fees, sales loads, trails, or other compensation for the sale of securities or investment products through SRWM. This structure reduces, but does not eliminate, potential conflicts associated with recommending one investment product over another.

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

SRWM does not charge performance-based fees and does not receive compensation based upon a share of capital gains or capital appreciation in client accounts. Accordingly, SRWM does not engage in side-by-side management of performance-fee and non-performance-fee accounts.

Item 7: Types of Clients

SRWM generally provides advisory services to individuals and families, including professionals, executives, business owners, retirees, high-net-worth individuals and families, and other individuals seeking investment management and financial planning services. The Firm may also provide services to trusts, estates, charitable organizations, retirement accounts, business entities, or other types of clients when appropriate. SRWM generally requires a minimum of $100,000 in assets for investment management relationships. The Firm may waive or modify this minimum based on the nature of the relationship, expected future assets, family relationships, complexity, or other factors in its discretion. Financial planning services, when elected, are provided under a separate written engagement and are subject to an additional fee as described in Item 5.

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

Investing in securities involves risk of loss, including the possible loss of principal. Clients should be prepared to bear investment losses and should not invest assets that cannot tolerate market fluctuation or loss.

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SRWM generally uses fundamental analysis, asset-allocation analysis, security and fund analysis, and financial planning analysis when developing recommendations. The Firm may review financial statements, economic and market data, company filings, research reports, fund materials, valuation information, interest rates, historical market behavior, and other sources it believes to be relevant. Fundamental analysis involves evaluating factors that may affect the value and expected return of an investment, such as financial condition, earnings, cash flows, valuation, competitive position, management, industry conditions, and economic conditions. Asset-allocation analysis considers how different asset classes may be combined in a portfolio based on a client's objectives, risk tolerance, time horizon, liquidity needs, and other financial circumstances. SRWM may use third-party research, financial planning software, portfolio analytics, and other technology to assist its analysis. Such tools support, but do not replace, the professional judgment and fiduciary responsibility of the Firm.

Investment Strategies

SRWM generally takes a long-term, goals-based approach to investment management. The Firm believes that investment strategy shouldbe driven primarily by a client's financial objectives, time horizon, liquidity requirements, tax circumstances, ability and willingness to accept risk, and overall financial position rather than by short-term market predictions. SRWM generally expectsto recommend diversified portfolios using some combination of exchange-traded funds, mutual funds, individual stocks, U.S. government and agency securities, corporate and municipal fixed-income securities, certificates of deposit, money marketinstruments, cash equivalents, and other securities appropriate toa client's circumstances. SRWM may recommend that a client retain an existing security, including a concentrated position, when tax consequences, client preference, restrictions, transition considerations, or other circumstances make immediate sale undesirable. The Firm may also recommend holding significant cash or short-term investments when appropriate for a client's liquidity needs or financial plan. SRWM does not generally seek to engage in frequent short-term trading, market timing, or speculative trading as a principal investment strategy.

B. Material Risks Involved

Market Risk: The value of securities may decline due to economic developments, investor sentiment, political events, changes in interest rates, geopolitical developments, or other market conditions.

Equity Risk: Stocks may experience substantial price fluctuations and may lose value due to company -specific developments, industry conditions, valuation changes, or broader market movements.

Fixed-Income and Interest-Rate Risk: Fixed-income securities are subject to interest-rate risk, credit risk, reinvestmentrisk, liquidity risk, and inflation risk. Bond prices generally decline when market interest rates rise, and longer-duration securities may be more sensitive to rate changes.

Credit and Default Risk: An issuer or counterparty may be unable or unwilling to make required interest or principal payments. A decline in perceived creditworthiness can also reduce the market value of a security.

Fund and ETF Risk: Mutual funds and exchange-traded funds are subject to the risks of their underlying investments and charge operating expenses that reduce investor returns. ETFs may trade at prices above or belowtheir net asset value and may experience reduced liquidity or wider bid-ask spreads.

Concentration Risk: A portfolio concentrated in a particular company, industry, sector, geographic region, or asset class may experience greater volatility or losses than a more diversified portfolio.

Liquidity Risk: Certain securities may be difficult to sell at an appropriate price or within a desired period, particularly during periods of market stress.

Inflation and Purchasing-Power Risk: Investment returns may fail to keep pace with inflation, reducing a client's purchasing power over time.

Tax Risk: Changes in tax laws ora client's individual tax circumstances can affect the after-tax results of an investment strategy. Tax-aware investing cannot eliminate taxes or guarantee a particular tax outcome.

Reinvestment Risk: Income or principal received from an investment may have to be reinvested at lower rates of

return. Cybersecurity

and Operational Risk: Financial markets, custodians, service providers, and advisory firms rely heavily on technology. Cybersecurity incidents, fraud, system failures, data errors, or operational disruptions could negatively affect client accounts or advisory services.

Long-Term Investing Risk: A long-term investment strategy does not prevent losses. Markets may remain below prior levels forextended periods, and future investment results may differ materially from historical experience.

C. Risks of Specific Securities Utilized

Individual Equity Securities: Individual company securities may be more volatile than diversified funds and can decline substantially or become worthless if the issuer experiences financial distress or failure.

Exchange-Traded Funds and Mutual Funds: Funds maybe affected by market risk, manager or index-tracking risk, liquidity risk, concentration risk, and the expenses charged by the fund. Fund expensesare in additionto SRWM's advisory fee.

Government and Agency Securities: U.S. government securities are subject to interest-rate and inflation risk. Securities issued or guaranteed by U.S. governmentagencies or government-sponsored entities may have different levels of government backing and may also be subject to credit risk.

Corporate and Municipal Bonds: Corporate and municipal fixed-income securities are subject to credit, default, interest-rate, call, liquidity, and inflation risks. Municipal securities may also be affected by the financial condition of the issuing state or local government and changes in tax law.

Cash and Cash Equivalents: Cash andshort-term instruments may reduce portfolio volatility but are subject to inflation risk and may earn returns below those available on longer-term investments. No investmentstrategy or security can eliminate investment risk. SRWM seeksto manage risk through diversification, asset allocation, security selection, monitoring, and financial planning, but the Firm cannot guarantee investment results or achievement of a client's financial objectives.

Item 9: Disciplinary Information

A. Disciplinary Information

SRWM and its management persons have no material criminal, civil, administrative, self-regulatory organization, or other disciplinary events to disclose under this Item.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-Dealer Registration

Neither SRWM nor its management personsare registered, or have an application pending to register, as a broker- dealer or registered representative of a broker-dealer.

B. Futures or Commodity Registration

Neither SRWM nor its management personsare registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading adviser, or associated person of any of the foregoing.

C. Other Financial Industry Activities and Affiliations

SRWM is independently owned and is not owned or controlled by a bank, broker-dealer, insurance company, accounting firm, law firm, investment company, or other financial institution. SRWM does not receive commissions for securities transactions or the sale of investment products. Alec Derrig is employed outside SRWM as Manager of Accounting and Finance fora single-member family office. His outside employment and the related potential conflict are described in his Form ADV Part 2B brochure supplement. Compensation from that outside employment is separate from SRWM and is not based on advisory fees paid by SRWM clients.

D. Selection of Other Advisers or Managers

SRWM does not currently maintain a program in which it routinely selects unaffiliated third-party investment advisers to manage client assets in exchange for compensation. IfSRWM recommends a third-party adviser or manager in the future, the Firm will disclose the arrangement and any related fees or conflicts as required.

Item 11: Code of Ethics, Participation or Interest

in Client Transactions and Personal Trading

A. Code of Ethics

SRWM has adopteda Code of Ethics designed to reflect the Firm's fiduciary obligations and establish standards of conduct for persons associated with the Firm. The Code addresses fiduciary duties, standards of business conduct, compliance with applicable securities laws, protection of material nonpublic information, personal securities transactions, reporting of personal securities holdings and transactions, conflicts of interest, gifts and entertainment, confidentiality, and compliance with the Firm's policies and procedures. A copy of SRWM's Code of Ethics is available at no charge to any client or prospective client upon request.

B. Recommendations Involving Material Financial Interests

SRWM does not generallyrecommend securities in which the Firm or its related persons have a material financial interest as issuer, sponsor, orunderwriter. If such a situation arises, SRWM will disclose the material conflict and comply with applicable legal and fiduciary requirements before proceeding.

C. Investing Personal Money in the Same Securities as Clients

SRWM and its personnel may invest personally in the same securities that are recommended to or held by clients. This createsa potential conflict of interest because SRWM personnel may have an economic interest in securities also owned by clients. SRWM addresses this conflict through its fiduciary obligations, Code of Ethics, personal trading policies, and supervisory procedures. Personnel may not use client information for personal benefit, place their interests ahead of clients, or otherwise engage in personal trading that disadvantages clients.

D. Trading Securities At or Around the Same Time as Clients

From time to time, SRWM personnel may buy or sell securities for their own accounts at or around the same time that clients purchase or sell the same securities. SRWM seeks to prevent personal transactions from being given preference over client transactions and may use trade aggregation, sequencing, pre-clearance, review, or other controls when appropriate. SRWM does not engage in principal transactions with clients and does not ordinarily engage in agency cross-transactions.

Item 12: Brokerage Practices

A. The Custodian and Broker We Use

SRWM generally recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer and qualified custodian, to maintain custody of client assets and execute securities transactions. SRWM is independently owned and operated and is not affiliated with Schwab. Clients open their Schwab accounts by entering into account agreements directly with Schwab. SRWM may assist clients with account-opening paperwork but does not open or own the custodialaccounts. Schwab holds client assets and executes transactions when instructed by SRWM or the client, as applicable.

B. How We Select the Custodian and Broker

In evaluating Schwab and other brokerage or custody arrangements, SRWM considers factors including:

- financial strength, reputation, security, and operational stability;
- quality, reliability, and speed of trade execution;
- transaction costs and other account charges;
- ability to execute, clear, and settle transactions;
- breadth of available investment products;
- technology, account access, reporting, and service capabilities;
- ability to facilitate transfers, withdrawals, and other account functions;
- investment research and tools;
- cybersecurity and operational infrastructure; and
- the availability of products and services that assist SRWM in serving clients and operating the Firm.

SRWM seeks best execution for client transactions. Best execution does not necessarily mean the lowest possible commission or transaction cost. The Firm considers the overall terms and quality of execution and services available to clients.

C. Your Custody and Brokerage Costs

Schwab generally does not chargea separate custody fee for standard brokerage accounts, but clients may incur other charges. Certain securities transactions may be commission free, while other transactions may involve commissions, transaction fees, markups, markdowns, bid-ask spreads, wire fees, account-service fees, or other costs. Schwab may also receive economicbenefits related to client cash balances or other services. These costs are separate from SRWM’s advisory fee. Mutual funds, exchange-traded funds, and other pooled investmentvehicles also charge internal management fees and operating expenses. These expenses are paid by the investment vehicle and reduce investment returns. SRWM does not receive those fund-level fees.

D. Products and Services Available to SRWM from Schwab

Schwab Advisor Services provides independent investment advisory firms with institutional brokerage, custody, trading, reporting, technology, and related services. Schwab may make available products and services that help SRWM serve client accounts or operate the Firm. These may include access to client account information, trade execution and allocation tools, pricing and market data, fee-deduction capabilities, recordkeeping, reporting tools, investment research, educational resources, practice -management resources, technology consulting, and other support services. Some Schwab services directly benefit clients, while others primarily benefit SRWM. Certain services may be provided at no charge orat a reduced cost because SRWM maintains client assets on the Schwab platform. The availability of these services creates a conflict ofinterest because SRWM hasan incentive to recommend Schwab rather thananother custodian that does not provide similar benefits to the Firm. SRWM addresses this conflict by evaluating the Schwab relationship based on the overall quality, scope, cost, security, and usefulness of Schwab’s services to clients and the Firm. SRWM believes its recommendation of Schwab is consistent with its fiduciary duty and clients’ best interests. SRWM does not receive cash compensation from Schwab for recommending that clients establish accounts with Schwab.

E. Directed Brokerage

Clients may request that SRWM use a particular broker or custodian. SRWM may accept or decline such a request. When a client directs brokerage, SRWM may be unable to obtain the same execution quality, pricing, aggregation opportunities, operational efficiency, or other benefits that could otherwise be available. A directed brokerage arrangement may therefore result in higher transaction costs or less favorable execution.

F. Aggregating Trades for Multiple Client Accounts

When appropriate, SRWM may aggregate orders for multiple client accounts seeking to purchase or sell the same security. Aggregated transactions are intended to promote fair and efficient execution. Participating client accounts will generally receive the same average execution price, with transaction costs allocated in a manner SRWM believes is fair and equitable. SRWM does not represent that aggregation will always produce a more favorable result.

Item 13: Review of Accounts

A. Frequency and Nature of Reviews

Client accounts are reviewed on an ongoing basis by Alec Derrig, CPA, CFP®. Reviews may consider portfolio allocation, investment performance, security-specific developments, economic and market conditions, cash balances, deposits and withdrawals, tax considerations, progress toward financial objectives, and changes in a client's financial circumstances. Formal client meetings or planning reviews are generally offered at least annually, with additional communication as appropriate based on the client's needs and circumstances.

B. Factors That May Trigger Additional Review

Additional reviews may be triggered by significant market, economic, tax, or political events; material changes in an investment; substantial cash flows; or changes in a client's employment, family circumstances, retirement plans, financial position, investment objectives, risk tolerance, liquidity needs, tax circumstances, or other relevant information.

C. Reports Provided to Clients

Clients receive account statements directly from the qualified custodian, generally Schwab, at least quarterly. These statements show account holdings, values, transactions, and other account information. Clients should carefully review custodial statements and promptly report any questions or discrepancies. SRWM may also provide supplemental portfolio, performance, financial planning, or other reports. Clients should compare any SRWM report concerning custodial assets with the statements received directly from the qualified custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits from Third Parties

SRWM may receive economic benefits from Schwab in the form of access to institutional custody and brokerage services, technology, research, educational resources, practice-management resources, and other services generally made available to independent investment advisers whose clients maintain accounts at Schwab. These benefits and the related conflict of interest are described in Item 12. SRWM does not receive cash compensation from Schwab for recommending Schwab to clients and does not receive compensation from third parties for recommending or selecting particular investment products.

B. Compensation for Client Referrals

SRWM does not currently compensate any person for client referrals, testimonials, or endorsements. Ifthe Firm enters into compensated referral, promoter, testimonial, or endorsement arrangements in the future, it will implement the arrangement in accordance with applicable law, enter into required agreements or disclosures, and update this brochure when required.

Item 15: Custody

SRWM does not maintain physical custody of client funds or securities. Client assets are maintained with an independent qualified custodian, generally Charles Schwab & Co., Inc. SRWM may be deemed to have limited custody of client assets because clients authorize the Firm to deduct advisory fees directly from their custodial accounts. Schwab maintains actual custody of client assets and sends account statements directly to clients at least quarterly. Clients should carefully review those statements and compare them with any reports provided by SRWM. SRWM does not serveas trustee, hold client securities or funds in its own name, or maintain authority to withdraw client funds for purposes otherthan payment of authorized advisory fees, except as otherwise specifically disclosed and authorized.

Item 16: Investment Discretion

SRWM generally provides investment management services on a discretionary basis. When a client grants SRWM discretionary authority, the Firm may determine which securities to purchase or sell, the amount of securities to purchase or sell, and the timing of transactions without obtaining the client's prior approval for each transaction. Discretionary authority is granted through the client's written advisory agreement and appropriate custodial documentation. Clients may impose reasonable written restrictions on SRWM's discretionary authority. SRWM may decline a restriction that it believes would materially interfere with its ability to manage the account effectively. Certain accounts or relationships may be managed on a non-discretionary basis; in those cases, SRWM makes recommendations but obtains client approval before implementing transactions.

Item 17: Voting Client Securities

SRWM does not accept authority to vote proxies on behalf of clients. Clients retain responsibility for voting proxies and other shareholder matters relating to securities held in theiraccountsand generally receive proxy materials directly from the custodian or issuer. Clients may contact SRWM with questions concerning a proxy solicitation. SRWM may provide general information or advice regarding a proxy matter when appropriate, but the client remains responsible for making the final voting decision. SRWM does not accept responsibility for filing or participating in class-action claims or other legal proceedings relating to securities held in client accounts unless separately agreed in writing.

Item 18: Financial Information

A. Balance Sheet

SRWM does not require or solicit prepayment of more than $1,200 in advisory fees per client six months or more in advance and therefore is not required to include a balance sheet with this brochure.

B. Financial Condition

SRWM does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

C. Bankruptcy

SRWM has not been the subject of a bankruptcy petition.