

Item 1 - FORM ADV PART 2 - BROCHURE



543 N. Wymore Road – Suite #104
Maitland, FL 32751

Phone: (407) 478-7899

Website: www.SprakerWest.com

Date: March 16, 2023

This Brochure provides information about the qualifications and business practices of SPRAKER WEST WEALTH MANAGEMENT, INC. (“The Firm”, “Advisor”, “SWWM”). If you have any questions about the contents of this Brochure, please contact us at (407) 478-7899 or via email at kyron@sprakerwest.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

SPRAKER WEST WEALTH MANAGEMENT, INC. is a Registered Investment Advisor (RIA) with the United States Securities and Exchange Commission (SEC). Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide information to help decide whether to hire or retain an Advisor.

Additional information about SPRAKER WEST WEALTH MANAGEMENT, INC. is also available on the SEC website at www.adviserinfo.sec.gov.

Please retain a copy of this Brochure for your records.

Item 2 – Material Changes

As of December 31, 2022, Founder Susan Spraker, Ph.D. retired and no longer serves as Senior Advisor, Chief Executive Officer and Chief Investment Officer. John M. West III, MBA, CFP®, now holds the positions of Senior Advisor, President, Chief Operating Officer.

As of January 2023, John M. West III, MBA, CFP® is now the majority owner of Spraker West Wealth Management, Inc.

As of January 2023, Kyron Harold, CFA®, assumed the role of Chief Compliance Officer.

We have amended our Client Referrals and Compensation section of this brochure to account for compensation paid to retiring advisors who refer clients to our Firm based on formal agreements.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes and a new Brochure as necessary based on changes or new information, at any time, without charge. Copies of our Brochure may be requested by contacting Kyron Harold, CFA®, Senior Financial Analyst, CCO, at (407) 478-7899 or kyron@sprakerwest.com and are available on our website www.sprakerwest.com, without charge.

Additional information about SPRAKER WEST WEALTH MANAGEMENT, INC. is available on the SEC website www.adviserinfo.sec.gov. The SEC website also provides information about any persons affiliated with SPRAKER WEST WEALTH MANAGEMENT, INC. who are registered, or are required to be registered, as investment advisor representatives.

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Item 4 – Advisory Business

Wealth Management Services

SPRAKER WEST WEALTH MANAGEMENT, INC. (“The Firm”) provides fee-only wealth management and advisory services for individuals, families, trusts, estates, charitable organizations and corporations. Wealth Management Services include but are not limited to initial and ongoing financial counseling, goals clarification, risk tolerance discussions, custodial asset transfers, initial and ongoing portfolio design based on an individual or client family investment policy, changes in policy and securities selection resulting from changing family circumstances or conditions, total financial advisory services, active portfolio management/frequent supervision, regular portfolio profit-taking and rebalancing, year-end tax loss harvesting, IRA required minimum distribution management, quarterly portfolio reporting, portfolio income reporting, and ongoing wealth planning. The Firm does not become a discretionary manager for securities purchased through a prior broker or advisor in an account unless it is agreed upon to be managed by The Firm through an executed Wealth Management Agreement.

Item 5 – Fees and Compensation

Wealth Management Fees

Fees are billed in advance at the beginning of every quarter directly to the account through Charles Schwab & Co., Inc. (“The Custodian”). This includes fees for accounts managed by the Firm but not custodied at Charles Schwab & Co., Inc.

The current fee structure is as follows:

<i>Assets Under Management</i>	<i>Annual Rate</i>	<i>Quarterly Rate</i>
IF Below \$400,000	1.50%	0.375%
IF Between \$400,001 - \$600,000	1.25%	0.313%
IF Between \$600,001 - \$1,000,000	1.00%	0.250%
OR First \$1,000,000	1.00%	0.250%
AND Second \$1,000,000	0.80%	0.200%
AND Any Assets Over \$2,000,000	0.50%	0.125%

The wealth management fee is not related to, and is separate from, any fee charged within and by fund companies, annuity companies, etc., whose securities are held in client accounts. Any fees and expenses of those companies are disclosed by the companies within their prospectuses sent directly by the companies to the clients. The fees charged by The Firm

also are exclusive of any electronic transaction fee or trade fee charged by The Custodian for buys and sells of securities such as individual stocks, bonds and certain mutual funds which do not pay The Custodian to offer the funds on their platform.

Fees assessed to client portfolios by SPRAKER WEST WEALTH MANAGEMENT, INC. may include adjustments for flows into or out of the accounts being billed during the quarter preceding the quarter being billed. Fee billing adjustments for capital flows (deposits/withdrawals/receipt of securities/transfer of securities) are applied based on capital size and timing of flows during the quarter. Adjustments are made for all flows with an absolute value of \$1000 or larger. Adjustments are added or subtracted from the total bill due for the upcoming quarter. The adjustment represents a prorated calculation for the amount of assets added or removed intra-quarter for which SWWM had or had not been previously compensated. The Billing procedure is part of the Spraker West Wealth Management, Inc. Quarterly Report Process. A copy of this process is saved in the SWWM Compliance Manual.

How Fees Are Administered

The Wealth Management Agreement (WMA) signed by the client at time of engagement, The Firm website, as well as this Brochure, disclose the wealth management fee schedule. It is the policy of The Firm to give this Brochure to prospective clients before the initial meeting and at least two days before agreeing to render any services. The fee is also clearly stated in the invoice included with each quarterly report.

Invoices provide the value of the account at the end of the prior quarter, and the computation of the fee for the next quarter based on the prior end of quarter value. Fees for the initial and final billing periods are prorated for the days of the quarter services were provided.

Wealth management fees are assessed directly each quarter to the managed portfolio. After reports are mailed to the client or the client is notified that they are available online, fees are submitted electronically to The Custodian. The Custodian then debits each account the fee which was invoiced to the account and pays this fee to The Firm. The Custodian does not guarantee accuracy of the fees but does compare each fee which is billed to monitor consistency of the fees. The Firm encourages clients to verify the accuracy of the management fee calculation each quarter.

Termination of Services

If the client terminates the advisory contract within three business days of signing the WMA, the client will be billed only on an hourly basis for meeting time and consulting at The Firm's current published rate (see Financial Consulting and Hourly Fees below). The client or The Firm may terminate the WMA at any time by giving a 30-day written notice to the other party. The Firm requires a 30-day notice to avoid spending time in analysis, rebalancing and tax planning in accounts which will be terminated. In all cases of WMA termination, the client is responsible for a management fee through the 30 days from notification date or the end of

the quarter, whichever occurs first, to pay for all financial, investment management, and tax planning rendered within 30 days of the notice and for termination processing.

If a client terminates the WMA without giving a 30-day notice, the fee due to The Firm will be at the published hourly rate for services rendered over and above portfolio management during the quarter, or the normal management fee for the 30 days, whichever is less. These services include the work of staff members outlined in the WMA. Time billed is based on time recorded by staff members on days services are rendered.

Financial Planning Services and Fees

The Firm provides financial planning to its wealth management clients as needed or as requested. Planning areas can include: (1) risk management, (2) investments, (3) taxes, (4) retirement, and (5) estate planning. A separate fee is charged for a client Plan for clients who have less than \$1 million in assets under management (AUM) with The Firm. Quoted fees for Financial Plans cost \$1,200-\$2,500 depending upon the level of complexity of the plan, the number of planning scenarios, and number of hours estimated to complete analysis of cash flow/risk/retirement/black swan events that need to be considered. The fee is payable by check to The Firm and is due upon commencement of the analysis. The fee covers the cost to The Firm for the extensive initial time commitment required to review a new or existing client's complete financial circumstances and goals. The fee is refundable within 3 business days of signing a Financial Planning Services Agreement.

The initial analysis is a major tool to determine the investment policy and asset allocation strategy for new wealth management clients. Analysis includes a risk profile survey, including in-depth discussion re: survey responses. The Plan outlines client-specific current circumstances, assets, income, expenses and goals, as well as addresses assumptions for the future needs and objectives of the client. After the initial fee for new client data gathering, input, and analysis and client review, there is no additional fee for Plan updates for wealth management clients as circumstances change.

Financial Consulting and Hourly Fees

The primary business of The Firm is to provide ongoing financial consulting for its wealth management clients at no additional fee over and above the wealth management fee. However, The Firm may provide hourly consulting at the published rate of \$300.00 per hour for those who do not need discretionary professional portfolio management. The hourly consulting fee is due at the time of service by check payable to The Firm. Credit cards are not accepted.

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

SPRAKER WEST WEALTH MANAGEMENT, INC. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

SPRAKER WEST WEALTH MANAGEMENT, INC. provides portfolio management services to individuals, families, trusts, estates, charitable organizations and corporations.

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

Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and past performance is not indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by an Advisor) will be profitable. Historical performance results for investment indices and/or categories will be provided for general comparison purposes only, and do not reflect the deduction of transaction and/or custodial charges, the deduction of an investment management fee, nor the impact of taxes, the incurrence of which would have the effect of decreasing historical performance results. It should not be assumed that account holdings will correspond directly to any indices.

Asset Allocation

Academic research offers considerable evidence that the asset allocation decision far outweighs security selection and market timing in its impact on portfolio variability and performance.

After reviewing the long-term performance and risk characteristics of various asset classes and balancing the risk and rewards of market behavior, the following asset classes and security types were selected to achieve the objectives of the Investor's Portfolio.

Asset Classes

Cash and Cash Equivalents
Fixed Income – U.S and non-U.S.
U.S. Equities – Large, Mid and Small
Foreign Equity – Developed and Developing Markets
Alternatives – Market-Neutral, Long/Short Equity, and Commodities

Security Types

Individual Stocks
Individual Bonds
Open-ended Mutual Funds
Exchange Traded Funds (ETFs)
Variable Annuities (No Load)

Portfolios are periodically rebalanced, at least annually and usually more frequently, in accordance with market movements, client investment policy, or change in investment policy by the client.

Selection/Retention Criteria for Investments /Investment Management Selection

Investment managers selection (for mutual funds and exchange traded funds) incorporates but is not limited to the following criteria:

- Past performance, relative to other investments having the same investment objective. Consideration shall be given to both performance rankings over various time frames and consistency of performance
- Costs relative to other funds with like objectives and investment styles
- The manager's adherence to investment style and size objectives
- Size of the proposed fund
- Length of time the fund/manager has been in existence and length of time it has been under the direction of the current manager(s) and whether or not there have been material changes in the manager's organization and personnel
- The historical volatility and downside risk of each proposed investment
- How well each proposed investment complements other assets in the portfolio
- The current economic environment
- The likelihood of future investment success, relative to other opportunities

Other Investment Strategies: Dollar Cost Averaging

The Firm does employ dollar cost averaging (DCA) as an investment strategy for clients systematically adding to their portfolios.

Item 9 – Disciplinary Information

Registered Investment Advisors (“RIAs”) are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SPRAKER WEST WEALTH MANAGEMENT, INC. or the integrity of The Firm's management. SPRAKER WEST WEALTH MANAGEMENT, INC. has never had any disciplinary events that require reporting.

Item 10 – Other Financial Industry Activities and Affiliations

SPRAKER WEST WEALTH MANAGEMENT, INC. and its management have no other financial industry activities or affiliations.

Item 11 Code of Ethics

Code of Ethics / Personal Trading Policy

The Firm enforces a Code of Ethics/Personal Trading Policy which requires officers and employees of The Firm to:

- Report all securities transactions and holdings for all accounts in which they have direct or indirect beneficial ownership interest;
- Submit to the Chief Compliance Officer (CCO) a quarterly report of personal securities transactions as discussed above, 30 days following the end of each calendar quarter and the brokerage statements supporting the transactions;
- Provide an account year-end statement, an immediate report of same at time of hire and each January thereafter;
- Strict adherence to reporting of any trades that could be a conflict with client trades BEFORE the trade is made.

Approval from the President or CCO must be granted for all employee trades of all individual securities and exchange traded funds prior to execution. The CCO reviews all employee investment account statements at hire, at least quarterly, and maintains records of same. A copy of the entire Code of Ethics/Personal Trading Policy is available upon request.

Participation in Client Transactions

Employees of The Firm and related persons (a spouse of an employee, for instance) may buy or sell securities for their own portfolios identical to those recommended to clients according to the Code of Ethics/Personal Trading Policy. To ensure its fiduciary responsibilities, The Firm has the following policy:

- All employees of The Firm are prohibited to buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of their employment, unless the information is also available to the investing public on reasonable inquiry;
- All employees may not prefer his or her own interest to that of the client (no trading ahead).

The Firm maintains a list of all securities held by its officers and staff and related persons. These holdings are reviewed quarterly by the Compliance Officer. The Firm requires all staff to act in accordance with all applicable Federal and State regulations governing RIA practices. Anyone not in compliance with the above is subject to disciplinary action and/or termination.

Item 12 – Brokerage Practices

The Firm uses the Charles Schwab platform to custody assets and place trades, with the exception of some individual bonds, which may be purchased through outside, unaffiliated bond brokers at a more favorable price for the client and outside (of Schwab) variable annuities, and outside accounts (403b, 401k, Deferred Comp Plans, etc.) which the client owns through their current employer held at other custodians. Clients may choose any insurance company, CPA firm or attorney of their choice for asset protection planning and implementation. The Firm has **NO AFFILIATION** with any bank, insurance company, real estate firm, CPA, law firm, or any other investment service and receives **NO COMPENSATION** in any way by same for services The Firm provides in service to the client.

The Firm participates in the Schwab Advisor Services custodial program offered to independent investment advisors by Charles Schwab & Co., Inc., a FINRA registered broker-dealer. The client approves the brokerage Custodian within the account application. The Firm has chosen Charles Schwab platform based on years of experience evaluating the functions and services of Schwab, as well as prior experience with and consideration of other custodians.

Based on the service quality, efficiency, speed of the Service Team and Managers, as well as the trade services offered by the Schwab Trading Desk for difficult or unusual trades, allowing discounts for certain small trades, for the immediate accessibility of the corporate offices in Orlando, availability for immediate delivery and pickup of funds for the clients, and assistance in the case of disaster recovery needs, The Firm has chosen to work exclusively with Schwab Advisor Services for its client business. Of course, it is the prerogative of The Firm to, at any time, change to another Custodian for the benefit of the clients.

Item 13 – Review of Accounts

Managed accounts are monitored on a continuous basis through daily account data downloads, including dividends, capital gains, additional investments or withdrawal of funds, and by verifications of trades. Accounts are reconciled daily. Periodic changes in securities such as approved mutual funds are made to assure the highest possible standard of management. The client receives confirmations by mail or email of all transactions, statements (at least quarterly) from the trustee or custodian, and quarterly performance and holdings reports from The Firm.

Reviews of the portfolios are made by the Sr. Analyst in the Research and Trading Department frequently and on an ongoing basis along with and under supervision John M.

West III, MBA, CFP®, Sr. Advisor, President, COO. Formal portfolio and retirement plan reviews are conducted with new clients preferably quarterly but at least annually. Existing clients may meet with an advisor as often as they choose, but at least annually; more frequently as appropriate for each client, depending upon changes in family/financial circumstances that warrant a shift in investment policy. Frequent phone, video, and email discussions are conducted with the client by an Advisor, Senior Analyst, Financial Planner and/or Client Services team of The Firm. Clients are encouraged to address questions and concerns outside of formal reviews as they occur. There is no limitation to the number of meetings which can be scheduled to ensure all financial planning matters are resolved in the clients' best interest.

Item 14 Client Referrals and Other Compensation

The Firm does not receive any direct compensation or commissions from any broker, broker dealer, insurance company or agent, bank, trust company, trustee, or any other institution. However, the Firm can receive, an economic benefit from Schwab in the form of support to help with costs running the Firm (software, hardware, etc.). The Firm also receives indirect economic benefits as value added services which benefit clients both directly and indirectly, including receipt of duplicate client account confirmations, research reports and materials, bulletins on compliance regulations and investments, industry seminars and webinars, access to dedicated Schwab Advisor Services Trading Desk/Service Support Teams, access to block trading to aggregate securities transactions at a possible lower cost compared to individual transactions, direct deductibility of advisory fees from client managed accounts, access to an electronic communication network for funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors, discounts on software used to report assets and performance to clients, and daily electronic downloads of account balances and transactions which allow detailed client account information retrieval.

The Firm also receives free webinars by financial services companies, trust companies and various other professionals who give market and economic commentary valuable to The Firm's continuing education. The firm does accept sponsorship for special client receptions or offers for advisory meetings with fund managers at the location of the sponsoring company, including out of state locations. Payment of or reimbursement for travel expenses are accepted by SWWM. Acceptance of such accommodations does not constitute an agreement to invest client funds in any product or investment vehicle and will not impact or compromise SWWM's fiduciary duty of diligence and reasonable basis for all decisions involving client funds.

The Firm has engaged in compensatory arrangements with advisors seeking to exit the wealth management business who are willing to endorse SPRAKER WEST WEALTH

MANAGEMENT INC. to their clients. Compensation is in the form of a percentage of the client's fees over the course of the specified period of time. The size and duration of this compensation arrangement is variable and determined by the age of the client and the size of the portfolio managed. This compensation arrangement is fully disclosed to all referred clients under this arrangement. It is also the policy of The Firm that any employee is eligible to receive a bonus when referring a qualified individual to The Firm who subsequently becomes a client.

Item 15 - Custody

The Firm does not take custody of client assets except to the extent that The Firm requests The Custodian to deduct advisory fees directly from client accounts. SWWM will not take title to any assets. Client grants Advisor discretionary authority for purchases and sales of client's securities. Advisor shall have no authority to withdraw funds from client's accounts, except:

- 1) To cover payment of normal and customary quarterly fees/as outlined in the Wealth Management Agreement, or
- 2) At client's specific request by phone or in person, identified by associates of The Firm who know the client, sent to address or account of record previously approved by the Client through a signed standing Letter of Authorization.

Clients should receive statements at least quarterly from the qualified custodian that holds and maintains client's investment assets. SPRAKER WEST WEALTH MANAGEMENT, INC. urges clients to carefully review such statements and compare such official custodial records to account statements that The Firm provides. The Firm's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

Investment Discretion Based on Investment Policy of Client

The Firm manages and trades in client discretionary portfolios through Limited Power of Attorney granted by the client through The Firm's Wealth Management Agreement and the Custodial account application(s) signed by the client. Client and Advisor set Investment Policy together. Investment Policy is determined through the Risk Profile Analysis and multiple discussions with the client as part of the initial client intake process.

Clients may change their investment policy by signing a new Investment Policy Statement (IPS) as changes in family circumstances and/or risk tolerance changes. The Firm may not change the IPS without the client's signature. Although The Firm is granted discretionary authority in the management of the client's account(s), the IPS allows, to a limited extent and in limited circumstances, direction/restrictions by the client.

Item 17 – Voting Client Securities

The Firm offers to vote proxies for its clients. In all cases where The Firm is given this responsibility, votes are made to ensure clients' best economic interest. The Firm will generally support management recommendations on proxy issues unless it is believed to be inconsistent with the clients' best interests. Records of the issues and votes are maintained by The Firm. A copy of The Firm's Proxy Voting Policy as well as records of how client securities proxies were voted may be obtained at any time by calling The Firm.

Item 18 – Financial Information

SPRAKER WEST WEALTH MANAGEMENT, INC. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceedings.

Item 19 – Requirements for State-Registered Advisors

SPRAKER WEST WEALTH MANAGEMENT, INC. is currently registered under the SEC.

Item 20 Supplement(s) – Supervised Persons

Senior Advisor, President, Chief Operating Officer

John M. West, III, MBA, CFP® - DOB 1981

- President, Sr. Advisor, COO, Spraker West Wealth Management, Inc., Maitland, Florida (July, 2021 - Present)
- Chief Compliance Officer, Spraker West Wealth Management, Inc. Maitland, Florida (July, 2021 – December, 2022)
- Board Member, FPA Central Florida Orlando, Florida (January, 2016 –December 2022)
- President, FPA Central Florida Orlando, Florida (January, 2019 – 2020)
- Sr. Advisor, Spraker Wealth Management, Inc. Maitland, Florida (October, 2012 – June, 2021)
- Certified Financial Planner® Practitioner (October, 2012 to present)
- Chief Compliance Officer, Spraker Wealth Management, Inc. Maitland, Florida (March 2012 – June, 2021)
- Chief Operating Officer, Spraker Wealth Management, Inc. Maitland, Florida (June 2011 – June, 2021)
- Sr. Financial Analyst, Spraker Wealth Management, Inc. Maitland, Florida (June, 2009 – October, 2012)
- Sr. Financial Analyst/Chief Operating Officer, KCM Asset Management, Inc. DeLand, Florida (January, 2003 – May, 2009) ○ Registered Representative:

- ✦ Parker Financial Corp., Valley Cottage, NY (June, 2008 – December, 2008)
- ✦ Hedge Fund Capital Partners, LLC, Brooklyn, NY (November, 2006 – March, 2007)
 - ✦ Millennium Brokerage, LLC, Chatham, NJ (July, 2003 – December, 2004)

□ Lifetime Member, University of Florida Alumni Association

□ MBA, Business Administration, University of Florida Gainesville, Florida (May, 2010)

□ B.B.A., Finance, Stetson University DeLand, Florida (May, 2003)

Education and Business Standards for Advisors of the Firm

Education	Bachelor's Degree and Master's Degree
Experience	Five (5) Years Investments and Financial Planning
Licenses	Certified Financial Planner* (CFP®) Practitioner

***Certified Financial Planner (CFP®) requirements:**

Education - Advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and, effective in 2007, attain a Bachelor's Degree from a regionally accredited United States college or university (or foreign university equivalent).

CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

Examination - Pass the comprehensive CFP® Certification Examination. The examination, instituted in 1991, is administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances. Prior to 1991, six individual subject examinations were required: principles of financial planning, insurance planning and risk management, investment planning, income tax planning, retirement planning, and estate planning.

Experience - Effective in 1989, complete at least three years of full-time financial planning related experience (or the equivalent, measured as 2,000 hours per year)