

Item 1 – COVER PAGE FORM ADV PART 2 - BROCHURE



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Website: www.SprakerWest.com

Date: March 13, 2024

This brochure (“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.adviseinfo.sec.gov.

Please retain a copy of this Brochure for your records.

Item 2 – Material Changes

We have made the following material changes to this Brochure since our March 16, 2023 annual updating amendment filing:

As of November 2023, the principal office of Spraker West Wealth Management Inc. moved to 334 West Morse Blvd. Winter Park, FL 32789.

As of November 2023, Eric Walter, MBA, CFP®, assumed the role of Financial Advisor.

Item 4 of this Brochure has been expanded to provide greater detail about our Advisory Business and Practices. Detail about our Portfolio Management and Financial Planning processes have been included. We also added information about our Assets Under Management and Miscellaneous details about business practices and client's best interests.

Item 7 of this Brochure has been expanded to explicitly state SWWM's view on minimum client account sizes.

Item 10 of this Brochure has been expanded to provide greater detail on activities not engaged in by The Firm.

Item 11 of this Brochure has been expanded to provide greater detail of our Code of Ethics and now includes a full summary of the SWWM Code of Ethics and Personal Trading Policy.

Item 12 of this Brochure has been expanded to provide greater detail on our Brokerage selection practices and provide detail on conflicts of interest that may arise from broker-dealer selection authority delegated to the SWWM.

Item 13 of this Brochure has been expanded to provide greater detail on the structure and content of Quarterly Reports provided by SWWM.

We expanded the detail and narrative format of Part 2B of this Brochure. Part 2B is the Brochure Supplement that provides greater detail on our Supervised Persons including their educational background, experience, disciplinary history, outside business activities, compensation and supervision. Item 2 (Educational Background and Business Experience) for our supervised persons was expanded to include the CFA designation requirements to serve as an Advisor at The Firm.

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

SPRAKER WEST WEALTH MANAGEMENT, INC. (“SWWM” or “The Firm”) provides fee-only wealth management and advisory services for individuals, families, trusts, estates, charitable organizations and corporations. SWWM was founded in 2008 under the name SPRAKER WEALTH MANAGEMENT, INC. and became SPRAKER WEST WEALTH MANAGEMENT, INC. in July of 2021. The firm’s owners are John Mitchell West III, MBA, CFP® and Susan Shannon Spraker. The Firm is located in Winter Park, Florida.

The Firm provides Portfolio Management and Financial Planning Services in a fiduciary capacity and strives to avoid conflicts of interest with clients. If conflicts of interest occur, SWWM aims to mitigate any conflicts of interests with clients or other individuals seeking advice. Client interests are put ahead of interests of The Firm in areas including: portfolio design/implementation, trading, financial counseling, goals clarification, wealth management and financial planning.

Portfolio Management Services

SWWM has risk tolerance discussions with all clients to develop an Investment Policy Statement (“IPS”) for all discretionary clients. The IPS is a roadmap for how a client’s assets will be invested and includes a description of the types of investments a client will hold grouped by asset class. Any client-imposed restrictions on investing in certain securities are reflected in the IPS or other documentation provided to SWWM.

Once the IPS has been created and discussed with the client SWWM executes ongoing management services including: supervision, tactical trading to mitigate volatility, profit-taking/rebalancing, year-end tax loss harvesting, IRA required minimum distribution management, quarterly portfolio reporting and portfolio income reporting. The IPS acts as the governing document for the portfolio management services provided by SWWM and each client is managed independently according to their signed IPS.

Financial Planning Services

The firm provides ongoing Financial Planning and Financial Counseling services as part of the Wealth Management Agreement a client signs when becoming a client. Financial Planning and Financial Consulting is included in the cost of Portfolio Management Services provided by the Firm. Financial Planning and Counseling Services involves discussions about Estate Planning, Tax Considerations, Retirement Planning, Education Funding, Budgeting and Risk/Insurance Planning.

SWWM does not provide legal advice or tax preparation services. SWWM also does not sell any insurance products or services as part of Financial Planning or Financial Counseling Services. As a result of the Financial Planning and Financial Counseling process SWWM may recommend the services of other professionals for certain non-investment implementation

purposes (i.e., attorneys, accountants, insurance agents, etc.). Clients are under no obligation to engage the services of any recommended professional, including SWWM, who are responsible for the quality and competency of the services they provide. The Firm makes no guarantees about the skills or ability of Estate Planning, Tax, Insurance or any other professionals Clients choose to employ.

Financial Planning and Financial Counseling can be provided independently of Portfolio Management Services. When Financial Planning and Financial Counseling Services are provided outside of an ongoing Wealth Management Agreement, the services are provided subject to a Financial Planning Services Agreement at either a fixed project fee or an hourly fee depending on complexity.

When Financial Planning and Financial Counseling is provided independently of ongoing Portfolio Management Services, all recommendations and advice are to be considered as of the time of delivery. SWWM maintains no obligation to provide updates to any recommendations outside of the scope of the Financial Planning Services Agreement signed by the client.

Miscellaneous

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If SWWM recommends that a client roll over their retirement plan assets into an account to be managed by SWWM, such a recommendation creates a conflict of interest if SWWM will earn a new (or increase its current) advisory fee as a result of the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by SWWM.

When SWWM provides investment advice to a client about the client's retirement plan account or individual retirement account, it does so as 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. Because the way SWWM makes money creates some conflicts with client interests, SWWM operates under a special rule that requires it to act in the client's best interest and not put its interests ahead of the client's. Under this special rule's provisions, SWWM must: meet a professional standard of care when making investment recommendations (give prudent advice); never put its financial interests ahead of the client's when making recommendations (give loyal advice); avoid misleading statements about conflicts of interest, fees, and investments; follow policies and procedures designed to ensure that SWWM gives advice that is in the client's best interest; charge no more than is reasonable for SWWM's services; and give the client basic information about conflicts of interest.

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.

Assets Under Management

As of December 31, 2023, SWWM managed \$227,272,169.51 in client assets on a discretionary basis. SWWM does not have any non-discretionary assets under management.

Item 5 – Fees and Compensation

Wealth Management Fees

Fees are billed in advance at the beginning of every quarter directly to the client’s 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 funds 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 (“Brokerage Fees”) such as individual stocks, bonds and certain mutual funds which do not pay The Custodian to offer the funds on their platform. Further information on the Brokerage fees which client may occur can be found in Item 12 of this Brochure.

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). SWWM believes performance-based fees can present conflicts of interest with clients' interest through the encouragement of excessive risk taking.

Item 7 – Types of Clients

SPRAKER WEST WEALTH MANAGEMENT, INC. provides portfolio management services to individuals, families, trusts, estates, charitable organizations and corporations. We typically provide investment advisory services for client portfolios of \$400k or more. However, we do accept new clients with lower assets and maintain advisory relationships with existing clients whose assets fall below \$400k. SWWM does not have a strict minimum account size.

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)

Unit Investment Trusts (UITs)

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.

None of our management person are registered or have an application to register as a broker-dealer or a registered representative of a broker-dealer.

None of our management persons are registered or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor or an associated person of the foregoing entities.

We have no relationship or arrangement that is material to our advisory business or to our clients with any related person listed below:

1. Broker-dealer, municipal securities dealer, or government securities dealer or broker;
2. 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);
3. Other investment advisor or financial planner;
4. Futures commission merchant, commodity pool operator, or commodity trading advisor;
5. Banking or thrift institution;
6. Accountant or accounting firm;
7. Lawyer or law firm;
8. Insurance company or agency;
9. Pension consultant;
10. Real estate broker or dealer; or
11. Sponsor or syndicator of limited partnerships.

When we recommend professionals for our clients, we receive no compensation directly or indirectly from those professionals that may create a material conflict of interest.

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

Code of Ethics

A complete copy of the SWWM Code of Ethics is available upon request. The following is a summary of SWWM’s Code of Ethics:

A. Standards of Conduct

This Code of Ethics consists of the following core principles:

- (1) The investment interests of clients will be placed ahead of the firm’s or any employee’s own investment interests.
- (2) Employees are expected to conduct their personal securities transactions in accordance with the Personal Trading Policy and will strive to avoid any actual or perceived conflict of interest with the client.
- (3) Employees will not take inappropriate advantage of their position with the firm that would disadvantage clients or undermine market integrity.

(4) Employees are expected to act in the best interest of each of our clients.

(5) Employees are expected to comply with federal securities laws. Strict adherence to the SWWM Compliance Manual will assist the employee in complying with this important requirement.

B. Protection of Material Nonpublic Information

Employees are expected to exercise diligence and care in maintaining and protecting our client's nonpublic, confidential information.

Employees are expected to not divulge information regarding SPRAKER WEST WEALTH MANAGEMENT securities recommendations or client securities holdings to any individual outside of the firm, except:

(1) As necessary to complete transactions or account changes

(2) As necessary to maintain or service a client or his/her account;

(3) With service providers providing administrative functions for SWWM (only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential information except as necessary to carry out its assigned responsibilities and only for that purpose) or

(4) As permitted by law.

C. Personal Conduct

In this spirit, employees are expected to adhere to the following guidelines:

(1) Acceptance of Gifts

Employees are prohibited from receiving any gift, gratuity, hospitality or other offering of more than *de minimis* value from any person or entity doing business with SWWM that is meant to influence the decision-making process of SWWM or compromise the fiduciary duty.

(2) Service as Director for an Outside Company

Any employee wishing to serve as director for an outside company (public or private) must first seek the approval of the CCO.

(3) Outside Business Interests

Any employee wishing to engage in business activities outside of SWWM's business must seek approval from the CCO and, if requested, provide periodic reports to the CCO summarizing those outside business activities.

(4) Annual Employee Acknowledgement

New employees must acknowledge they have read, understand and agree to comply with this Code of Ethics and the Personal Trading Policy. All employees are required to verify their understanding of all policies and procedures in the firm's annual policy manual acknowledgement process.

Personal Trading Policy

A complete copy of the SWWM Personal Trading Policy is available upon request. The following is a summary of SWWM's Personal Trading Policy:

A. Matters to Consider Before an Employee Places a Trade

Employees are encouraged to consider whether the amount or nature of a transaction will impact prices or market for a security, whether the employee will benefit from purchases or sales made for a client; whether the transaction will likely harm a client or whether there is a suggestion of impropriety.

B. Personal Trading Restrictions

(1) General

Employees are prohibited from trading in personal accounts (buy/sell/sell short) in a security until one day after trading of that same security has occurred for client accounts unless the employee trade is block traded with all other client trades. SWWM prohibits employees from discussing proprietary investment trading strategies or providing trade timing or execution advice to outside parties not engaged in an advisory relationship with The Firm.

Trade requests must be submitted via email to the CCO, President, or Sr. Analyst for approval and permission to trade received before any employee trades in any securities.

It is the employee's responsibility to know whether a security they or their household member(s) intend(s) to buy or sell is being traded by the firm and to seek the appropriate approvals.

(2) Initial Public Offerings and Private Placements

All employees are required to obtain approval from the CCO *before* investing in an initial public offering ("IPO") or a private placement, defined as an equity position within a non-public company

C. Reports of Personal Securities

Employees are required to report securities transactions and holdings for all accounts in which the employee has a direct or indirect beneficial financial interest, including all household members.

(1) Quarterly Report

Each employee must submit to the CCO a quarterly report of personal securities transactions in which the employee had a direct or indirect beneficial ownership interest. Employees must submit copies of brokerage statements which contain the reported information of trading.

Employees are not required to report transactions on the quarterly transaction report affected through an automatic investment plan so long as the investment allocation was determined in advance of the actual trade. Any transaction that overrides the pre-set schedule or allocations of the plan must be reported as described. Further, all holdings of automatic investment plans must be reported as described in Holdings Report below.

(2) New Employee and Existing Employee Annual Holdings Report

Within 10 days of becoming an employee of SWWM, and immediately as new accounts are opened, new employees are required to provide a report of all personal securities holdings to the CCO.

All employees are required to provide a report of all personal securities holdings to the CCO on an annual basis.

D. Acceptable Personal Trades

The following forms of securities may be freely held or traded by employees, without regard to the Personal Trading Restrictions described above.

- (1) Shares of open-end mutual funds not managed by SWWM;
- (2) Shares of any money market fund;
- (3) Direct obligations of the United States Government;
- (4) Money market instruments;
- (5) Digital currencies via direct exchange (Excludes ETFs)

All employees are required to report promptly any violation of this policy to the CCO. Upon discovering a violation of this policy, The Firm may impose disciplinary action or dismissal as deemed appropriate, including disgorgement of profits, reversal of the trade or suspension of trading privileges.

Item 12 – Brokerage Practices

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 process. SWWM assesses the following factors when evaluating brokerage options:

A. Cost of Execution

Cents per share of market and limit orders. Costs of buying, selling or swapping transaction fee mutual funds. Trade away fees and spreads on fixed income securities.

B. Capability and Quality of Execution

Evaluating the relative execution of order handling ability (e.g., speed), as well as the order size, trading character of the security, the ability to find buyers and sellers, access to markets, integrity, reputation, financial stability, the frequency of failed trades, error policies, history of fair error resolution, reliability, and good recordkeeping.

C. Trading Systems and Platforms

Ease of use, simplicity, reliability and functionality of various trading applets (via online, phone, etc.), the ability to perform block trading and price averaging, and the ability to interface with current portfolio management software.

D. Other Considerations

Availability of mutual funds (No Transaction Fee) and fixed income inventory. Client service issues (new account process, ability to transfer securities, dedicated customer service, transferring of funds, number of funds available on platform, holding/cost of holding assets, speed of service, attitude, etc.) are taken into consideration.

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. It is the prerogative of The Firm to, at any time, change to another Custodian for the benefit of the clients.

(1) Research and Other Soft Dollar Benefits

SWWM **does not** receive any direct compensation or commissions from any broker-dealer including Charles Schwab & Co., Inc., however SWWM does receive indirect economic benefits as a result of our brokerage relationship, such as:

- Research reports and materials, including bulletins on compliance regulations,
 - Research may be generated by Charles Schwab & Co., Inc., or other Third-party firms who have licensed their research to the broker-dealer
 - Research includes Economic Data, Individual stock reports, Mutual Fund and ETF Reports, Equity and Bond Sector Reports and other various financial market data
- Educational events and programs at reduced or waived costs
- Duplicate client confirmations
- Access to exclusive institutional trading desks and service support teams
- Access to block trading which aggregates securities transactions at a possibly lower cost and allocate the appropriate shares to client accounts
- Ability to have investment advisory fees deducted directly from client 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,
- Daily electronic downloads of brokerage account balances and transactions

These benefits are received as a result of client brokerage commissions and represent a benefit for The Firm as they would be costly to replicate outside of the broker-dealer relationship. Although SWWM acts as a fiduciary, and endeavors to act in client's best interest, our recommendation that clients maintain much of their assets in accounts at Charles Schwab & Co., Inc., may be based in part on the benefit to our firm of the availability of some of the foregoing products and services, and not solely on the nature, cost, or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

SWWM's clients may, therefore, incur higher costs than those charged by other discount brokers. However, we have selected these custodians for their generally low fees relative to other large custodians. We prefer to recommend custodians who possess significant size and financial resources for the purpose of enhanced safety of clients' funds. For all of these reasons, the lowest cost custodian for clients may not be recommended to clients by SWWM.

The benefits outside of brokerage execution received from broker-dealers are used to service client's whose accounts utilize the brokerage platform. Research may

provide market knowledge beneficial to all clients, not just those with accounts at a particular broker-dealer.

(2) Brokerage for Client Referrals

SWWM does not aim to receive referrals as part of the broker-dealer selection process. SWWM is listed on Charles Schwab & Co. Inc “Schwab Advisor Network “of advisors within a local geographic area.

(3) Directed Brokerage

Should a client direct SWWM to use a broker other than those recommended by SWWM, SWWM may not be able to negotiate commission rates on the client’s behalf, obtain better pricing through “block trades”, have its trade and information requests honored, or obtain the indirect benefits for clients described.

SWWM’s Trade Aggregation and Allocation procedures seek to allocate investment opportunities among clients in the fairest possible way.

A. Aggregation Procedures

(1) Orders for the same security entered on behalf of more than one client will generally be aggregated in a single order in an effort to obtain best execution at the best security price available. This will be done subject to the aggregation being in the best interests of all participating clients.

(2) When a trade is to be executed for an individual account and the trade is not in the best interests of other accounts, the trade will only be performed for that account.

B. Instances in which client orders will not be aggregated include, but are not limited to, the following:

(1) Clients directing SPRAKER WEST WEALTH MANAGEMENT to use certain broker/dealers, in which case such orders shall be separately affected;

(2) Trader and/or portfolio manager determines that the aggregation is not appropriate because of market conditions;

(3) Portfolio manager must affect the transactions at different prices, making aggregation unfeasible; and

(4) Client accounts that are held at different custodians, where coordinating trades on different trading systems is not feasible.

Prior to execution, SPRAKER WEST WEALTH MANAGEMENT shall formulate allocations in our trading/rebalancing software and will save electronic reports of all allocations on our server. All allocations shall be made prior to the close of business on trade date.

It is expected that this trade aggregation and allocation policy will be applied consistently. However, if application of this policy results in unfair or inequitable treatment to some or all of SPRAKER WEST WEALTH MANAGEMENT's clients, we may deviate from this policy.

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. Clients are also able to access data about their accounts through a secure online portal found on our website sprakerwest.com. This data is updated daily. In addition to the reports available online, SWWM provides Quarterly Reports which include:

- A summary of Asset Allocation and a comparison to long term target allocation
- Performance Results for the 1, 3, 5, 10 year & Since Inception periods, as applicable
- A Holdings Summary of all positions
- An Income Report for the prior Quarter
- A Transaction ledger for the prior Quarter
- A Billing Statement

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. If clients are so inclined, they can provide

instructions to SWWM on how they would prefer to have their shares voted. In the event a client has voting preferences that conflict with SWWM's general policies and procedures for Proxy voting, they will be given the option to retain voting rights. 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

SWWM does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, as such, no disclosure of our balance sheet is required for our most recent fiscal year.

SWWM 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.

Brochure Supplement (Part 2B of Form ADV)

Item 1 – Cover Page

Supervised Person

John M. West, III, MBA, CFP®

Spraker West Wealth Management Inc.

334 W. Morse Boulevard,
Winter Park, Florida 32789
(407) 478-7899

March 13, 2024

This brochure supplement provides information about John M. West, III that supplements the Spraker West Wealth Management Inc. Brochure (“Brochure”). You should have received a copy of that brochure. Please contact Kyron Harold, Chief Compliance Officer (407) 478-7899 or kyron@sprakerwest.com if you did not receive this brochure or if you have any questions about the contents of this supplement.

Additional information about John M. West, III is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

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

Education:

- MBA, Business Administration, University of Florida Gainesville, Florida (May, 2010)
- B.B.A., Finance, Stetson University DeLand, Florida (May, 2003)

Employment – Last Five Years:

- President, Sr. Advisor, COO, Spraker West Wealth Management, Inc., Winter Park, 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)
- 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)

Professional Designations:

- Certified Financial Planner® Practitioner

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®) or Chartered Financial Analyst® (CFA®)

Certified Financial Planner (CFP®) Requirements:

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

Education - Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

Examination - Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

Experience - Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

Ethics - Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

Ethics - Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who

seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Chartered Financial Analyst® (CFA®) Requirements:

The Chartered Financial Analyst (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 138,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 – Disciplinary Information

John M. West, III, has had no legal or disciplinary events to disclose.

Item 4 – Other Business Activities

John M. West, III, is not registered, nor does he have an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or as an associated person of an FCM, CPO, or CTA. These registrations are required to receive commissions from trading activity or the sale of financial products. SWWM is a fee-only firm and no one at SWWM receives commissions so these registrations are unnecessary.

Item 5 – Additional Compensation

John M. West, III, does not receive compensation for any other investment advisory activities outside of his relationship with SWWM.

Item 6 – Supervision

SWWM has adopted and periodically updates a compliance manual that outlines for each employee the various rules and regulations they are required to adhere to. The firm has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. The Firm has also adopted a Code of Ethics that requires each employee to act in the best interest of clients at all times. For answers to any questions about our employee monitoring programs, policies and procedures, please contact Kyron Harold, Chief Compliance Officer, (407) 478-7899 or kyron@sprakerwest.com.

Brochure Supplement (Part 2B of Form ADV)

Item 1 – Cover Page

Supervised Person

Eric S. Walter, MBA, CFP®

Spraker West Wealth Management Inc.

334 W. Morse Boulevard,
Winter Park, Florida 32789
(407) 478-7899

March 13, 2024

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Additional information about Eric S. Walter is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Eric S. Walter, MBA, CFP® - DOB 1980

Education:

- MBA, Business Administration, Boston University, Boston, Massachusetts (October, 2023)
- B.A., Kinesiology & Exercise Science, University of Kentucky Lexington, Kentucky (May, 2004)

Employment – Last Five Years:

- Financial Advisor, Spraker West Wealth Management, Inc., Winter Park, Florida (November, 2023 - Present)
- Financial Planner, Spraker West Wealth Management, Inc. Maitland, Florida (January, 2018 – November, 2023)

Professional Designations:

- Certified Financial Planner® Practitioner

Education and Business Standards for Advisors of the Firm

Education: Bachelor’s Degree and Master’s Degree

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