

# Maverick Private Wealth LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Maverick Private Wealth LLC. If you have any questions about the contents of this brochure, please contact us at (469) 430-2534 or by email at: [info@maverickpw.com](mailto:info@maverickpw.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Maverick Private Wealth LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Maverick Private Wealth LLC's CRD number is: 175105.*

2591 Dallas Parkway  
Suite 300  
Frisco, TX 75034  
(469) 430-2534  
[maverickpw.com](http://maverickpw.com)

*Registration does not imply a certain level of skill or training.*

Version Date: 7/31/2025

## **Item 2: Material Changes**

As of June 2025, the ownership of Maverick Private Wealth LLC has changed. Michael H. Reynolds has acquired an ownership interest in Maverick Private Wealth LLC. Brian Czerwinski remains an owner of Maverick Private Wealth, but with a smaller percentage of ownership. Anthony Bird remains an Indirect owner of Maverick Private Wealth LLC through his ownership of Cornerstone Wealth Advisors LLC., but with a smaller percentage of ownership. These changes are reflected in the Form ADV.

Michael H. Reynolds, previously the Managing Member of Hedgeo Capital Advisors, LLC, has joined Maverick Private Wealth LLC, bringing his expertise in proprietary investment systems and client portfolio management.

Maverick Private Wealth now recommends clients to use either Schwab Advisor Services (a division of Charles Schwab & Co., Inc., member FINRA/SIPC) and Interactive Brokers, LLC (member FINRA/SIPC/NYSE) for custody and execution services as disclosed in Item 12.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes .....	i
Item 3: Table of Contents .....	ii
Item 4: Advisory Business .....	2
Item 5: Fees and Compensation.....	6
Item 6: Performance-Based Fees and Side-By-Side Management .....	8
Item 7: Types of Clients .....	9
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss.....	9
Item 9: Disciplinary Information .....	14
Item 10: Other Financial Industry Activities and Affiliations.....	14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	16
Item 12: Brokerage Practices.....	16
Item 13: Reviews of Accounts .....	18
Item 14: Client Referrals and Other Compensation .....	19
Item 15: Custody.....	19
Item 16: Investment Discretion .....	19
Item 17: Voting Client Securities (Proxy Voting).....	19
Item 18: Financial Information.....	20
Item 19: Requirements For State Registered Advisers .....	20
A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background .....	20
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any).....	20
C. Calculation of Performance-Based Fees and Degree of Risk to Clients .....	21
D. Material Disciplinary Disclosures for Management Persons of this Firm .....	21
E. Material Relationships That Management Persons Have With Issuers of Securities (If Any) .....	21

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Maverick Private Wealth LLC (hereinafter "MPW") is a Limited Liability Company organized in the State of Texas.

The firm was formed in January 2015, and the principal owner is Brian Czerwinski. Additional owners include Michael H. Reynolds and Anthony J Bird, indirectly through his ownership of Cornerstone Wealth Advisors LLC.

MPW is committed to acting in the best interests of its clients, providing objective advice, and fully disclosing all material facts and conflicts of interest. This fiduciary duty extends to all advisory services, ensuring client interests are prioritized over those of MPW or its personnel.

### B. Types of Advisory Services

#### *Investment Management Services*

MPW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. MPW creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

MPW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. MPW will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

MPW seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of MPW's economic, investment or other financial interests. To meet its fiduciary obligations, MPW attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, MPW's policy is to seek fair and equitable allocation of investment opportunities/transactions among its

clients to avoid favoring one client over another over time. It is MPW's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

### ***Proprietary Investment Systems***

MPW may leverage proprietary investment methodologies and systems developed internally to enhance asset allocation and selection processes. These systems may utilize, but not be limited to, price, directional, relative strength, momentum, and macro market data to identify optimal assets during positive market cycles and implement defensive strategies when appropriate, complementing MPW's client-tailored portfolio management.

### ***External Managers***

MPW may recommend to clients that all or a portion of their investment portfolio be managed on a discretionary basis by external money managers ("External Managers"). The client may be required to enter into a separate agreement with the External Manager(s), which will set forth the terms and conditions of the client's engagement of the External Manager. In addition to this Brochure, clients may also receive the written disclosure documents of the respective External Managers engaged to manage their assets. MPW also assists in establishing the client's investment objectives for the assets managed by External Managers, monitors and reviews the account performance and defines any restrictions on the account. The investment management fees charged by the designated External Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are typically exclusive of, and in addition to, advisory fees charged by MPW. To the extent possible, MPW seeks to assess the External Managers' investment strategies, past performance, and risk results in relation to its clients' individual portfolio allocations and risk exposure.

### ***Private Investments***

For specific qualified clients, MPW may recommend investment in private investment vehicles whose interests are not publicly offered under the Securities Act of 1933 ("Private Funds"). Such Private Funds may be structured as fund of funds or as access vehicles to underlying funds or portfolios managed by third-party investment advisors. MPW will, from time to time and as appropriate, solicit clients to invest in such vehicles, and decide which clients to approach for some or all of these investments, in its own discretion.

MPW advisory fees charged to clients for investing in a Private Fund are in addition to the fees charged by the Private Funds to investors. It should also be noted that certain employees and/or owners of MPW may directly participate through the Private Fund itself for the purposes of investing.

### ***ERISA Services and Retirement Investments***

We are deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (“IRAs”) pursuant to the Employee Retirement Income and Securities Act (“ERISA”), and regulations under the Internal Revenue Code of 1986 (“the Code”), respectively. As such, we are subject to specific duties and obligations under ERISA and the Code that include, among other things, restrictions concerning certain forms of compensation.

We may assist you with retirement plan accounts and this assistance may present a conflict of interest. When you leave an employer there are typically four options regarding an existing retirement plan account and you may use a combination of these options; 1) if permitted, leave the funds in your former employer’s plan, 2) if roll overs are permitted and you have new employer with a plan available, roll over the funds to your new employer’s plan, 3) roll over to an Individual Retirement Account (“IRA”), or 4) withdraw or cash out your funds from the plan which may have adverse tax consequences depending on your age. When we recommend that you roll over your retirement plan assets into an account to be managed by us, such a recommendation creates a conflict (benefit to us) when we earn an advisory fee on your rolled over funds. You are under no obligation to roll over retirement plan assets to an account managed by us.

In addition to providing advisory services with respect to participation in employer-sponsored retirement plans and individual retirement accounts, MPW can provide advisory services to the sponsors of defined contribution, defined benefit and non-qualified deferred compensation plans who have ultimate authority to direct the investing and reinvesting of plan assets as they deem appropriate, considering each plan’s stated objective, liquidity needs, and stated policies and guidelines. MPW is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from engaging in specified conflicts of interest.

### ***Limited Scope 3(21) Investment Advisor***

MPW may act as a limited scope ERISA 3(21) fiduciary that can advise, help, and assist plan sponsors with their investment decisions.

As an investment advisor, MPW has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using MPW can help the plan sponsor delegate liability by following a diligent process.

### ***3(38) Investment Manager***

MPW acts as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan’s assets. MPW would then become solely responsible and liable for the selection, monitoring and replacement of the plan’s investment options.

### ***Donor Advised Services***

Certain MPW clients have donor advised funds through various third-party charitable programs including the Schwab Charitable Fund ( a “Charitable Platform”), which funds will be managed in accordance with the specific investment policies and guidelines of the applicable Charitable Platform. Clients will establish a donor advised account, transfer funds earmarked for charitable donation and recognize a tax deduction in the year that funds are transferred into an account opened on a Charitable Platform. The funds remain in such account until the Client designates a charity, an amount, and a date to donate to such charity.

Under independent advisor programs established within a Charitable Platform, donors nominate an independent investment adviser, including MPW, to manage accounts established on any Charitable Platform. If nominated, MPW will manage the donor's account pursuant to investment guidelines established by the Charitable Platform.

### ***Reporting on Non-Advisory Assets***

MPW may, entirely at its own discretion, provide consolidated reporting on Client non-advisory assets when requested. Non-advisory assets are assets independently owned by Clients but not included as assets under management by MPW. These non-advisory assets will not be subject to MPW's investment review, and no investment advice will be provided with respect to non-advisory assets. MPW will report the value of each non-advisory asset to the Client, based solely on the valuations received by MPW from the third-party managers of the non-advisory assets or other third parties, but MPW will not have any obligation to independently examine, confirm or review non-advisory asset valuations.

### ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning, charitable planning; and debt/credit planning.

MPW may work with your other professionals or partner with professionals or organizations with which MPW has prior experience, including but not limited to, tax professionals, attorneys, insurance agents and business consultants to assist you with any and all aspects of your financial planning. Should MPW refer you to another professional, you are under no obligation to engage their services.

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

MPW generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds

and private placements. MPW may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

MPW will tailor a program for each individual client. This will include an interview session to get to know the client’s specific needs and requirements as well as a plan that will be executed by MPW on behalf of the client. MPW may use “model portfolios” together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. These restrictions may be changed at any time by notifying us. However, if the restrictions prevent MPW from properly servicing the client account, or if the restrictions would require MPW to deviate from its standard suite of services, MPW reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. MPW does not participate in any wrap fee programs.

### **E. Assets Under Management**

MPW has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$ 7,136,693	\$0	July 2025

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### *Asset-Based Fees for Portfolio Management*

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
\$0 - \$5,000,000	1.50%
\$5,000,001 - \$50,000,000	1.00%

Total Assets Under Management	Annual Fee
\$50,000,001 - And Up	0.75%

Client fees are determined based upon the size and scope of the relationship, complexity of the investments, necessary time commitments and associated travel requirements. If based on a percentage of the value of assets under management or advisement, the fee is no more than 1.50% annually. MPW does not discriminate between clients based on their fee structure. Our fees are negotiable, and we reserve the right to negotiate any fees based on numerous factors. Therefore, some clients may pay more or less than others for similar services. MPW believes its fees are reasonable in relation to the fees charged by other investment advisers. The amount and method by which fees are charged is established in each client's written agreement with MPW. The management fee is paid monthly in arrears according to the Investment Advisory Contract between Client and MPW. Fees are assessed based upon the market value of the managed assets as valued on the last business day of the previous month as provided by the custodian. Flows into new accounts for the first month are charged on a day-count proration and flows out of any closing account for the last month are charged on a day-count proration. Clients may instruct MPW to charge fees for one account to another bearing a client's name. Fees are subject to change and may be changed by MPW, in its sole discretion, after giving written notice to clients, with such new fees effective 30 days after the date of the written notice. Unless MPW grants an exception, the custodian will deduct from the managed assets and pay MPW the management fee each month after MPW submits a request to pay to the custodian. In the event there is not sufficient cash in the client account(s) to pay MPW's fee, MPW will sell assets to pay the fee. Clients are responsible for verifying the management fee computations since custodians are not asked to perform this task. The custodian(s) will send clients a monthly statement showing all amounts paid from the managed assets, and transactions including deduction of the management fee.

***ERISA SERVICES: 3(21) INVESTMENT ADVISOR AND 3(38) INVESTMENT MANAGEMENT FEES***

Fees for ERISA services will be billed based on the structure and the amount as agreed upon between MPW and the plan sponsor in the written Investment Advisory Agreement.

The level of fees will be set based upon the scope, nature and complexity of the services selected by the plan sponsor, the number of participants in the plan, and the overall size of the plan. Fees are negotiable between MPW and the plan sponsor. Fees may be paid directly by the plan sponsor or out of plan assets by a service provider or other third party, as authorized by the plan sponsor.

***Financial Planning Fees***

You may engage MPW to create a Financial Plan exclusive of Portfolio Management or request MPW performs financial planning services outside the scope of services in our

original engagement. In these situations, MPW charges an hourly or flat fee based on the complexity and/or total time to complete the plan.

Fees for ongoing financial planning renewal services, after the initial financial plan completion, are based upon the projected hours necessary to maintain an effective planning process for Client, the number of expected meetings during the year, the professionals used, and the complexity of Client's situation.

## **B. Payment of Fees**

### ***Payment of Asset-Based Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check, ACH and wire.

Hourly financial planning fees are paid in arrears upon completion.

## **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by MPW. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

MPW collects its fees in arrears. It does not collect fees in advance.

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither MPW nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

MPW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

MPW provides investment advisory services to individuals, high net worth individuals, corporations, trusts, estates, private foundations, donor-advised funds, pensions, profit-sharing plans, 401(k) plans and other retirement plans.

MPW targets working with clients with a net worth of \$3,000,000 or more but reserves the right to accept any clients it wishes, including those whose net worth is below the threshold.

### *Minimum Account Size*

There is no account minimum for any of MPW's services.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

MPW's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

**Charting analysis** involves the use of patterns in performance charts. MPW uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

## *Investment Strategies*

MPW uses long term trading, short term trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Quantitative Model Risk:** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Modern Portfolio Theory** assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more

risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

MPW's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Short sales** entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Selection of Other Advisers:** MPW's selection process cannot ensure that money managers will perform as desired and MPW will have no control over the day-to-day operations of any of its selected money managers. MPW would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

MPW's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other

precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Hedge Funds** often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Private equity funds** carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk,

sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Illiquid Securities** Investments in Private Funds or other private investment vehicles or private securities may underperform publicly offered and traded securities because such investments:

- Typically require investors to lock-up their assets for a period and may be unable to meet redemption requests during adverse economic conditions;
- Have limited or no liquidity because of restrictions on the transfer of, and the absence of a market for, interests in these funds;
- Are more difficult to monitor and value due to a lack of transparency and publicly available information about these funds;
- May have higher expense ratios and involve more inherent conflicts of interest than publicly traded investments; and
- Involve different risks than investing in registered funds and other publicly offered and traded securities. These risks may include those associated with more concentrated, less diversified investment portfolios, investment leverage and investments in less liquid and non-traditional asset classes.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither MPW nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither MPW nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Brian Lee Czerwinski owns indirectly F2 Analytics LLC through his ownership of Cornerstone Family Office Advisors LLC. Mr. Czerwinski also has ownership in I3 Advisors LLC which offers specialized services through a network of professionals. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. MPW always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of MPW in connection with such individual's activities outside of MPW.

Michael Reynolds is a licensed insurance agent in the state of Florida. However, if he were to receive commissions on insurance products recommended to clients, this service will create a conflict of interest with MPW clients if he recommends the purchase of insurance products, including annuities, from which he will receive a commission. This conflict is mitigated through the facts that any recommendations are made in the client's best interests and that clients are free to purchase insurance products elsewhere.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

MPW may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay MPW its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between MPW and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. MPW will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. MPW will ensure that all recommended advisers are licensed or notice filed in the states in which MPW is recommending them to clients.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

MPW has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. MPW's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

MPW does not recommend that clients buy or sell any security in which a related person to MPW or MPW has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of MPW may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of MPW to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. MPW will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of MPW may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of MPW to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, MPW will never engage in trading that operates to the client's disadvantage if representatives of MPW buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

## **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on MPW's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and MPW may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in MPW's research efforts. MPW will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

MPW recommends clients to use either Schwab Advisor Services (a division of Charles Schwab & Co., Inc., member FINRA/SIPC) and Interactive Brokers, LLC (member FINRA/SIPC/NYSE) for custody and execution services.

### ***1. Research and Other Soft-Dollar Benefits***

While MPW has no formal soft dollars program in which soft dollars are used to pay for third party services, MPW may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). MPW may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and MPW does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. MPW benefits by not having to produce or pay for the research, products or services, and MPW will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that MPW's acceptance of soft dollar benefits may result in higher commissions charged to the client.

### ***2. Brokerage for Client Referrals***

MPW receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

MPW will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If MPW buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, MPW would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. MPW would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

MPW's advisors conduct periodic reviews of their client accounts, no less than annually. These reviews entail comparing the client's investment objective to the portfolio holdings, cash flows, changes in the client's financial position, and often discussion with the client.

MPW's advisors meet with each of their assigned clients on a periodic, ongoing basis, no less than annually to review each managed account. The frequency of these reviews can be impacted by several factors including:

- The size and complexity of the client's accounts
- The complexity of the client's financial situation
- Unexpected changes in the client's goals or objectives
- Changes in political and economic circumstances
- Other lifestyle changes warranting a review of the client's financial situation

Performance reports will be prepared for each review and the monthly account statements and confirmations will be generated by the custodian of the assets.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, MPW's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of MPW's advisory services provided on an ongoing basis will receive, no less than quarterly, a report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

MPW does not receive any economic benefit, directly or indirectly from any third party for advice rendered to MPW's clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

MPW does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, MPW will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

MPW provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, MPW generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, MPW's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to MPW).

## **Item 17: Voting Client Securities (Proxy Voting)**

MPW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

MPW neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither MPW nor its management has any financial condition that is likely to reasonably impair MPW's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

MPW has not been the subject of a bankruptcy petition in the last ten years.

## **Item 19: Requirements For State Registered Advisers**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business background of MPW's current management person, Brian Lee Czerwinski, can be found on the Form ADV Part 2B brochure supplements for this individual.

The education and business background of Michael H. Reynolds can be found on the Form ADV Part 2B brochure supplements for this individual.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

MPW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at MPW or MPW has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.

### **F. Referral Arrangements**

See Item 14.