



Introduction

SPIEGELMAN WEALTH MANAGEMENT, INC. ("SWM") is registered with the Securities and Exchange Commission as an investment adviser. Registration does not imply any specific level of skill or training. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

SWM provides personalized investment management and financial planning services. The firm offers its services to individuals, families, trusts, charitable organizations, pensions, and small businesses. There is no minimum account size required to work with SWM.

FINANCIAL PLANNING

SWM may provide its clients broad or focused financial planning and consulting services on topics including but not limited to Investments, Insurance, Education Funding, Budgeting, Estate Planning, Tax Minimization, and Retirement.

INVESTMENT MANAGEMENT

When SWM performs investment management services, we will do so on a discretionary basis. This means that while we maintain an ongoing relationship with each client, we will not seek specific approval of changes to the securities in client accounts. Each client's portfolio is invested according to that client's investment objectives. SWM determines these objectives with the client through reviewing client provided documents, client interviews and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a portfolio we believe will best fit your needs. SWM will monitor the clients' investment accounts on an ongoing basis and make adjustments as it determines necessary. Clients may engage SWM to manage all or a portion of their assets. SWM allocates client assets among multiple Exchange Traded Funds, however SWM may in certain circumstances utilize Mutual Funds, Equities, Bonds and other securities necessary to meet client's investment objectives. SWM may also direct or recommend how client's assets should be allocated in variable annuity products, employer-sponsored plans, and/or 529 plans. Clients retain the responsibility to promptly notify SWM if anything in their financial situation changes that may impact previously made investment recommendations.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients, which can be found here: <https://adviserinfo.sec.gov/firm/summary/336637>



"Given my financial situation, should I choose an investment advisory service? Why or why not?"



"How will you choose investments to recommend to me?"



"What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"

What fees will I pay?

INVESTMENT ADVISORY SERVICES

Generally, SWM will provide discretionary investment advisory services with the annual investment advisory fee based upon a percentage (%) of the market value of the assets placed under SWM's management, which shall generally be between 1.35 % and 0.45% per year based upon the size of a client's account and complexity of their needs. SWM does not charge separately for financial planning.


The annual investment advisory fee shall be paid monthly, in arrears, based upon the average daily balance during the billing period and will be automatically deducted from the client's account. SWM, in its sole discretion, may charge a higher or lower investment management fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

Fees may be paid via direct debiting from a client's advisory account or via direct invoice. SWM does not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the



client unless the Client participates in a Wrap Program. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available here: <https://adviserinfo.sec.gov/firm/summary/336637>

 *"Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

SWM may recommend that a client rollover retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result of a rollover, we may earn fees on those accounts. This presents a conflict of interest, as SWM has a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code.

For more specific information regarding our fees, please refer our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available here: <https://adviserinfo.sec.gov/firm/summary/336637>


 *"How might your conflicts of interest affect me, and how will you address them?"*

How do your financial professionals make money?

Financial professionals of SWM are paid a portion of the asset management fees collected from clients. Financial professionals are not rewarded sales bonuses.

Do you or your financial professionals have legal or disciplinary history?


No. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS.

 *"As a financial professional, do you have any disciplinary history? For what type of conduct?"*

Additional Information

Additional information about our investment advisory services can be found by clicking <https://adviserinfo.sec.gov/firm/summary/336637>. A copy of our relationship summary can also be requested by calling (925) 385-6200.

 *"Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?"*

 *"Who can I talk to if I have concerns about how this person is treating me?"*



= Consider asking your financial professional these questions.