

Access Wealth Planning, LLC

We are registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ and 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.

Item 2. **Relationships and Services**

***What investment services and advice can you provide me?***

We offer investment advisory services to retail investors, including the review of and advice regarding the client’s allocation of assets. We provide continuous and regular supervisory services, quarterly reports, telephone consultations regarding financial affairs, monitoring of investments, economic advisory letters and articles of interest. Our services are offered on a discretionary or non-discretionary basis. We will use discretion to determine the securities to be bought or sold as well as the amount to be bought or sold if we are granted discretionary authority. The contract you sign with us for discretionary services will grant us that authority. If we do not have discretionary authorization, we will provide the client with recommendations and will execute the trades only after the client’s authorization. We will not require an account minimum for these services and the annual fee shall not exceed 1.5% of the market value of the assets.

Additionally, we offer financial planning services, which may include cash management, tax planning, risk management, retirement planning, education planning and estate planning. We charge a fixed fee, based on the complexity of the plan.

*Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Items 4 and 7).*

**Conversation Starters:** Ask your financial professional:

- 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?

**Item 3. Fees, Costs, Conflicts, and Standards of Conduct**

***What fees will I pay?***

The annual fee for our investment advisory services shall not be more than 1.5% of the market value of the assets under our management. This means that the more assets that are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase, or not to take actions that would decrease, the assets in your account. Our investment advisory fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses which will be incurred by your account. 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.

We charge a fixed fee for our financial planning services. These fees are negotiable, but generally range from \$1,500 - \$5,000 based on the complexity of the client’s situation.

We also offer a flat fee that combines the fee for financial planning and investment advisory services. These fees are negotiable, but generally range from \$8,000 - \$18,000 annually.

Please make sure you understand what fees and costs you are paying.

*Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Item 5).*

**Conversation Starters:**

- Help me understand how these fees and costs might affect my investment. 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 must act in your best interest and not put our interests 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 is an example to help you understand what this means:

Charles Schwab ("Schwab") is our choice for custody and brokerage services. In evaluating whether to recommend Schwab to our clients, we consider the availability of the products and services available from Schwab and not solely the nature, cost or quality of custody and brokerage services provided by Schwab. These products and services may be used for all of our clients or may benefit us. This is a conflict that comes out of how we service clients.

Certain of our personnel are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS") which is a broker dealer registered with the SEC. Through their relationship with PKS, those personnel may offer brokerage services through PKS and generate a commission for securities transactions implemented through PKS. Please ask PKS for their Form CRS/Relationship Summary for more information on their business and conflicts. This is a conflict of interest to the extent we recommend a transaction when our personnel generate commissions from PKS as a result of our recommendations.

Certain of our personnel are licensed insurance agents and may recommend that you purchase insurance products. If insurance products are purchased, we may receive direct or indirect compensation, which presents a conflict of interest. This is a conflict of interest to the extent we recommend a transaction when our personnel receive commissions as a result of our recommendations.

*Additional Information: See more detailed information in our Form ADV, Part 2A brochure (Items 10-12, 14).*

**Conversation Starters:**

- How might your conflict of interest affect me, and how will you address them?

***How do your financial professionals make money?***

Our financial professionals are compensated on a salary basis and are eligible to receive discretionary bonuses. You should discuss your financial professional's compensation directly with your financial professional.

Item 4. **Disciplinary History**

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

No, our firm and our financial professionals do not have any legal or disciplinary history to disclose.

**Conversation Starters:**

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

Item 5. **Additional Information**

You can find additional information about our firm and the services we provide on our website [www.access-wealth.com](http://www.access-wealth.com) and [www.investors.gov/CRS](http://www.investors.gov/CRS). Additionally, you can contact us at 973-740-2400 or [info@access-wealth.com](mailto:info@access-wealth.com) to request more or up-to-date information and a copy of our Form CRS.

**Conversation Starters:**

- 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?



**access WEALTH**

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**Web Site: [www.access-wealth.com](http://www.access-wealth.com)**

**March 2025**

## **FORM ADV PART 2A BROCHURE**

**This brochure provides information about the qualifications and business practices of Access Wealth. If you have any questions about the contents of this brochure, please contact us at 973-740-2400. 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 Access Wealth is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Access Wealth is 112973.**

**Access Wealth is a registered investment adviser. Registration or any reference to the firm being or the use of the terms "registered", "registration," or "registered investment adviser" does not imply a certain level of skill or training.**

## Item 2 - Material Changes

This section of the brochure highlights specific material changes made since the last update and offers clients a concise summary of these modifications. The most recent update to our brochure was on August 28, 2024.

Furthermore, we have updated the Assets Under Management information in Item 4 to align with the filing of our Annual Updating Amendment.

Clients are encouraged to request a copy of Form ADV Part 2A at any time, free of charge. Requests can be made by sending a written notice to our Chief Compliance Officer at 120 Eagle Rock Avenue, Suite 230, East Hanover, NJ 07936, or via email at [thagberg@access-wealth.com](mailto:thagberg@access-wealth.com).

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## Item 4 - Advisory Business

The United States Securities and Exchange Commission granted the investment adviser registration of Access Wealth (“*Access Wealth*”) on July 1, 2001. The owners of the company are Darren Zagarola (CRD Number 5121491), Howard Hook (CRD Number 4199828), Howard Milove (CRD Number 3230483), and Lawrence Zagarola (CRD Number 4411966). Tracy A. Hagberg (CRD Number 1841992) is Chief Compliance Officer of the firm. *Access Wealth* employs a holistic and comprehensive approach to investment advisory and financial planning services. Our approach helps clients accumulate, protect and ultimately pass wealth from generation to generation in an efficient manner.

### *Investment Advisory Services*

Our investment advisory process begins with conversations to identify the client’s goals and objectives, investment time horizon, and establish the client’s risk tolerance. *Access Wealth* then recommends investment allocations that are suitable for the client and provide a balanced level of risk and reward. *Access Wealth* continues to monitor portfolios and will rebalance as we feel appropriate given economic considerations. We believe communication is a key component of the ongoing investment advisory process so we will update clients on changes in the economy and encourage our client’s to communicate to us any changes in their financial situation.

Our investment advisory services are provided on a discretionary basis, as specified in the client’s agreement. When *Access Wealth* is engaged to provide asset management services on a discretionary basis, *Access Wealth* will monitor client accounts to ensure that they are meeting asset allocation requirements. On behalf of our clients, if any changes are needed to the investments, *Access Wealth* will make those changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. Clients may at any time place restrictions on the types of investments *Access Wealth* may use on the client’s behalf, or on the allocations to each security type. Clients will receive written or electronic confirmations from the account custodian after any changes are made to the client account. Clients will also receive statements, at least quarterly, from the account custodian.

### *Financial Planning*

We offer our clients a comprehensive range of financial planning services that are tailored to their specific needs and goals and believe it is an ongoing process as life evolves and unfolds. Through a thorough analysis of their financial resources, we provide our clients with personalized financial programs that cover their present and future assets and liabilities, including retirement planning,

charitable giving strategies, estate planning, tax planning, insurance planning, family wealth planning, education savings planning, and cash management strategies.

Our financial planning services go beyond providing general recommendations for our clients. We provide specific actions that clients can take to achieve their financial objectives, such as acquiring insurance coverage, setting up an individual retirement account, or drawing up estate planning documents. If needed, we can recommend the services of other professionals to implement our recommendations. However, our clients are not obligated to use any recommended professionals, and they retain absolute discretion over all such decisions.

We also offer ongoing financial counseling, account reviews, securities research, and other advisory services related to investments. We strongly encourage our clients to renew their financial planning services annually to review and update our previous recommendations and services, ensuring that their financial plans remain aligned with their evolving needs and goals. Financial Planning services are offered under a separate agreement from investment advisory services.

### *Account Aggregation Services*

We offer Account Aggregation services to our clients, allowing them to track their investments through *Access Wealth*. To utilize this service, clients must provide their investment statements or consent to have their transactions downloaded directly to our systems. *Access Wealth* will maintain the investment data and produce Portfolio Management reports on a monthly or quarterly basis. Please note that this service is solely for tracking and reporting purposes and does not include financial planning or management of assets.

### *Assets Under Management*

As of December 31, 2024, the firm had regulated assets under management in the amount of \$490,388,112 of which 100% is managed on a discretionary basis.

## Item 5 - Fees and Compensation

### A. Fees Charged

#### *Investment Advisory Services*

All investment advisory clients will be required to execute an Investment Advisory Agreement that will describe the type of asset management services to be provided and the fees, among other items. Clients are advised that they may pay fees that are higher or lower than fees they may pay another advisor for the same services, and may in fact pay lower fees for comparable services from other sources. Clients are under no obligation at any time to engage or to continue to engage *Access Wealth* for investment services.

*Access Wealth's* annual investment advisory fee shall vary (up to 1.50% of the total assets placed under *Access Wealth's* management) and shall be based upon various objective and subjective factors, including, but not limited to, the amount of the assets placed under *Access Wealth's* direct management, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered. The investment advisory fee is negotiable in the sole discretion of *Access Wealth*.

#### *Financial Planning Services*

For financial planning services, *Access Wealth* charges a fixed fee. These fees are negotiable and typically range from \$1,500 to \$5,000 depending on the complexity of the client's situation. Upon engaging *Access Wealth*, 50% of the fee is due, and the remaining balance is due upon presentation of the written financial plan.

We will offer a full refund on the financial planning fee if the client notifies us, in writing, within 10 days of receiving the financial plan that they are not satisfied with it. We will also refund any fees paid if the client terminates our relationship before the financial plan is delivered.

#### *Investment Advisory and Financial Planning Combined Services*

In addition, we offer a combined flat fee for financial planning services and investment advisory services. These fees are negotiable and typically range from \$8,000 to \$18,000 per year, payable on a quarterly basis. The client can choose to have the fees deducted from their investment advisory accounts under *Access Wealth's* management or be billed separately.

Both the client and *Access Wealth* have the right to terminate the advisory agreement at any time with written notice. If the agreement or our services are terminated, we will promptly refund any unearned portion of the fee to the client.



### *Account Aggregation Services*

*Access Wealth* offers account aggregation services at a fixed rate fee ranging from \$1,000 to \$5,000 per year. This fee is negotiable in the sole discretion of *Access Wealth*.

### *B. Fee Payment*

#### *Investment Advisory Services*

The investment advisory fee is paid quarterly, in advance, and the value used for the fee calculation is the net value as of the last market day of the previous quarter, including any cash in the client's account. For example, if your annual fee is 1.00%, each quarter we will multiply the value of your account by 1.00%, then divide by four to calculate our fee. To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to *Access Wealth*. Clients may also pay the investment advisory fee directly by submitting a check payable to *Access Wealth*.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. *Access Wealth* is to invoice the qualified custodian for fees. Each quarter, the client will receive a statement from their account custodian showing all transactions in their account, including the fee. *Access Wealth* encourages clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on reports prepared by *Access Wealth* against the information in the statements provided directly from the custodian. Please alert *Access Wealth* of any discrepancies.

#### *Financial Planning Services*

Upon engaging *Access Wealth* for financial planning services, 50% of the fee is due at the time of engagement, and the remaining balance is due upon presentation of the written financial plan. The fee can be paid by check or debited from the investment assets managed by *Access Wealth*.

We will offer a full refund on the financial planning fee if the client notifies us, in writing, within 10 days of receiving the financial plan that they are not satisfied with it. We will also refund any fees paid if the client terminates our relationship before the financial plan is delivered.

#### *Investment Advisory and Financial Planning Combined Services*

When *Access Wealth* is engaged by the client for both investment advisory and financial planning services, a fixed fee is charged and payable on a quarterly basis. The client can choose to have the fee deducted from their investment advisory accounts under *Access Wealth's* management or be billed separately.

Both the client and *Access Wealth* have the right to terminate the advisory agreement at any time with written notice. If the agreement or our services are terminated, we will promptly refund any unearned portion of the fee to the client.

### *C. Other Fees*

There are a number of other fees that can be associated with holding and investing in securities. Expenses of a mutual fund or ETF will not be included in management fees, as they are deducted from the value of the shares by the manager. When selecting mutual funds that have multiple share classes for recommendation to clients, *Access Wealth* will take into account the internal fees and expenses associated with each share class, and it is *Access Wealth's* policy to choose the lowest-cost share class available, absent circumstances that dictate otherwise. For complete discussion of expenses related to each mutual fund or ETF, you should read a copy of the prospectus issued by that fund. *Access Wealth* can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

### *D. Pro-rata Fees*

If a client becomes a client during a quarter, they will pay a management fee for the number of days left in that quarter. If clients terminate the relationship during a quarter, they will be entitled to a refund of any management fees for the remainder of the quarter they may have prepaid. Once the notice of termination is received, *Access Wealth* will assess pro-rated fees for the number of days between the end of the prior billing period and the date of termination to be paid in whatever way a client direct (check, wire). *Access Wealth* will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be “de-linked”, meaning they will no longer be visible to *Access Wealth* and will become a retail account with the custodian.

### *E. Compensation for Sales of Securities*

*Access Wealth* does not engage in the buying or selling of securities for the purpose of earning commissions, and we do not receive any compensation related to securities transactions in any client account, beyond the investment fees as described previously.

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

Our firm does not charge performance-based fees, which are fees based on a share of capital gains or capital appreciation of the assets of a client. We believe that charging such fees creates a conflict of interest between our clients and us.

## Item 7 - Types of Clients

*Access Wealth* provides investment advisory services to a diverse range of clients, including individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. We do not have a minimum portfolio size requirement, but all clients are required to enter into a formal services agreement that outlines the scope of services to be provided.

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

### *Strategies and Methods of Analysis*

Modern Portfolio Theory (“MPT”) is a time-tested economic concept that emphasizes the importance of asset allocation, diversification, and rebalancing as part of a sound investment strategy. According to MPT, a portfolio's risk and return characteristics are determined by its composition and the correlation of its components. An optimal asset allocation for each level of risk is designed to achieve the best balance of risk and return, rather than the highest returns or the lowest risk. The Efficient Frontier represents the meeting point of each level of risk and reward, where optimal portfolios reside. At *Access Wealth*, we implement the principles of Modern Portfolio Theory to construct models with varying levels of risk (standard deviation) that are appropriate for each client's investment horizon, risk tolerance, age, and financial situation. In some cases, we may create a client-specific model to meet special situations.

Our Investment Committee evaluates each investment manager selection for every asset class. To be considered, investment managers must have at least a five-year history in their asset class, with a standard deviation (risk) within an acceptable range, historical returns within an acceptable range, and fees within acceptable parameters for their asset class. The investment management firm must also maintain the investment style for which it has been chosen to represent within the portfolio.

While individual money managers may charge a fee to be paid by the client, *Access Wealth* and its associated persons do not receive any portion of that fee.

### *Risk of Loss*

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that *Access Wealth* may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and

state tax purposes, which may be taxed at a higher rate than long term strategies. *Access Wealth* endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.

- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** "Margin" is a tool used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. Margin carries a higher degree of risk than investing without margin.
- **Short Sales.** "Short sales" are a way to implement a trade in a security *Access Wealth* feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Thus, in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus, in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. *Access Wealth* utilizes short sales only when the client's risk tolerances permit.
- **Risks specific to private placements, sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have

potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While *Access Wealth* selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition risk.** As assets are transitioned from a client's prior advisers to *Access Wealth* there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by *Access Wealth*. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of *Access Wealth* may adversely affect the client's account values, as *Access Wealth's* recommendations may not be able to be fully implemented.
- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.
- **Excess Cash Balance Risk:** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a "cash sweep" program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash-based investments,

such as money market funds. We do not receive compensation of any kinds for facilitating your participation in such cash sweep accounts.



## Item 9 - Disciplinary Information

We are obligated to inform clients or prospective clients of any material legal or disciplinary events that may impact their assessment of our advisory business or the integrity of our management. *Access Wealth* has nothing to report.

## Item 10 - Other Financial Industry Activities and Affiliations

We are required to disclose any relationship or arrangement that is material to our advisory business with certain related people.

### *A. Broker-dealer*

Some of our supervised persons are registered representatives of Purshe Kaplan Sterling Investments, Inc. (“PKS”), a registered broker-dealer (CRD No. 6627), and a member of FINRA and SIPC. As registered representatives of PKS, these individuals may engage in securities transactions that are not related to their work with *Access Wealth*. They may receive commission-based compensation, including 12b-1 fees for the sale of investment company products, for such transactions, which is separate from the advisory fees paid to *Access Wealth*. This may create a conflict of interest, as they may be incentivized to prioritize generating commissions rather than acting solely in the best interest of the client. However, clients are not obligated to follow the recommendations of the supervised people, and neither the Advisor nor supervised persons will earn ongoing investment advisory fees in connection with any products or services implemented in their separate capacity as a registered representative. Please refer to Item 10 – Other Financial Industry Activities and Affiliations for more information.

### *B. Broker-dealer*

Principals of *Access Wealth*, nor any related 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.

### *C. Relationship with Related Persons*

#### *Consultants*

LMZ Consulting Services LLC (“LMZ”) is a Class A Member of *Access Wealth* and provides consulting services to *Access Wealth*, which services include: attendance at quarterly board meetings, review of annual projections of cash flow and yearly budget, review of marketing plans and assistance in developing new business referrals, availability to meet with existing and potential clients, assist in doing due diligence on potential acquisitions and provide other consulting services as requested and mutually agreed upon. Lawrence Zagarola is the sole member of LMZ.

#### *Tax Preparation*

Certain associated persons of *Access Wealth* are Certified Public Accountants (“CPAs”). Howard Hook prepares tax returns for individuals who are not clients of *Access Wealth*. His tax business is not promoted through *Access Wealth*.

#### *D. Recommendations of Other Advisers*

Darren Zagarola, Howard Milove and Howard Hook are the owners of DHH Advisors, LLC, (“DHH”) an SEC registered investment adviser that provides comprehensive financial planning and investment advisory services. *Access Wealth* and *DHH* are parties to an agreement whereby *DHH* has hired *Access Wealth* to provide back office and administrative services and support for a fee.

*Access Wealth* has an inherent conflict of interest related to the relationship with EKS Associates (“EKS”). Certain principal owners of *Access Wealth* are also principal owners of *EKS*. This creates a conflict of interest, as there may be a financial incentive for *Access Wealth* to refer clients to *EKS*, as they would have personal financial gain. Additionally, there is a conflict where being an employee of *EKS* may potentially take away from an employee’s ability to conduct business for *Access Wealth*. *Access Wealth* attempts to mitigate these conflicts by requiring employees to acknowledge the firm’s Code of Ethics and reminding them of their individual fiduciary duty to the clients of *Access Wealth*, which requires that employees put the interests of their clients above their own.

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

### A. Code of Ethics

As a fiduciary, *Access Wealth* and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings.

Our Code of Ethics is designed to ensure that we act with the highest standards of ethical behavior and professionalism. It is not intended to identify all possible conflicts of interest, and associated persons may still be liable for personal trading or other conduct that violates their fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below:

- Integrity – We shall offer and provide professional services ethically, honestly, and fairly.
- Objectivity – We shall be objective in providing professional services to clients.
- Competence – We shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which we are engaged.
- Fairness – We shall perform professional services in a manner that is fair and reasonable to clients and shall disclose conflicts of interest in providing such services.
- Confidentiality – We shall not disclose confidential client information without the specific consent of the client, except in response to proper legal process, or as required by law.

We periodically review and update our Code of Ethics to ensure that it remains current and relevant, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. We are happy to provide a copy of our Code of Ethics to any client or prospective client upon request.

### B. Financial Interest Conflict

*Access Wealth* does not recommend to clients that they invest in any security in which *Access Wealth*, or any principal thereof has any financial interest.

### C. Participation or Interest in Client Transactions

We and our related persons may buy or sell securities that are the same, similar, or different from those we recommend to clients. Recommendations may vary between clients due to differing objectives and risk tolerances. However, we ensure that neither we nor any related party receives preferential treatment over our clients.

#### D. Personal Trading

To avoid conflicts of interest, we may restrict or prohibit associates from trading certain securities. Any exceptions must be approved by our Chief Compliance Officer beforehand, and we keep records of all personal securities transactions as required by regulations.

## Item 12 - Brokerage Practices

### Suggestion of Broker

#### Charles Schwab

*Access Wealth* does not maintain custody of your assets that we manage. Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“*Schwab*”), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with *Schwab*. *Schwab* will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use *Schwab* as custodian/broker, you will decide whether to do so and will open your account with *Schwab* by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open an account for you, although we may assist you in doing so. If you do not wish to place your assets with *Schwab*, then we cannot manage your account.

#### ***How We Select Brokers/Custodians***

We seek to select a custodian/broker that will hold your assets and execute transactions. When considering whether the terms that *Schwab* provides are, overall, most advantageous to you when compared with other available providers and their services, we consider a wide range of factors including:

1. Combination of transaction execution services and asset custody services (generally without a separate fee for custody).
2. Capability to execute, clear and settle trades (buy and sell securities for your account).
3. Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
4. Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
5. Availability of investment research and tools that assist us in making investment decisions.
6. Quality of services.
7. Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices.

8. Reputation, financial strength, security and stability.
9. Prior service to us and our clients.
10. Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to us from *Schwab*”).

### ***Your Brokerage and Trading Costs***

For our client accounts that *Schwab* maintains, *Schwab* generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your *Schwab* account. Certain trades (for example, many mutual funds, and U.S. exchange-listed equities and ETFs) may not incur *Schwab* commissions or transaction fees. *Schwab* is also compensated by earning interest on the uninvested cash in your account in *Schwab's* Cash Features Program.

In addition to commissions, *Schwab* charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities sold are deposited (settled) into your *Schwab* account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have *Schwab* execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through *Schwab*, we have determined that having *Schwab* execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”). By using another broker or dealer you may pay lower transaction costs.

### ***Products and Services Available to us from Schwab***

*Schwab Advisor Services*<sup>™</sup> is *Schwab's* business serving independent investment advisory firms like ours. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to *Schwab* retail customers. However, certain retail investors may be able to get institutional brokerage services from *Schwab* without going through our firm. *Schwab* also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. *Schwab's* support services are generally available at no charge to us. Following is a more detailed description of *Schwab's* support services:

**Services that benefit you.** *Schwab's* institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products available through *Schwab* include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. *Schwab's* services described in this paragraph generally benefit you and your account.

**Services that do not directly benefit you.** *Schwab* also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both *Schwab's* own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at *Schwab*. In addition to investment research, *Schwab* also makes available software and other technology that:

1. Provide access to client account data (such as duplicate trade confirmations and account statements).
2. Facilitate trade execution and allocate aggregated trade orders for multiple client accounts.
3. Provide pricing and other market data.
4. Facilitate payment of our fees from our clients' accounts.
5. Assist with back-office functions, record keeping and client reporting.

**Services that generally benefit only us.** *Schwab* also offers other services intended to help us manage and further develop our business enterprise. These services include:

1. Educational conferences and events.
2. Consulting on technology and business needs.
3. Publications and conferences on practice management and business succession.
4. Access to employee benefits providers, human capital consultants and insurance providers.
5. Marketing consulting and support.

*Schwab* provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. *Schwab* also discounts or waives fees for some of these services or pays all or a part of a third party's fees. *Schwab* also provides us with other benefits, such as occasional business entertainment for our personnel. If you did not maintain your account with *Schwab*, we would be required to pay for these services from our own resources.

### ***Our Interest in Schwab's Services***

The availability of these services from *Schwab* benefits us because we do not have to produce or purchase them. We do not have to pay for *Schwab's* services. The fact that we receive these benefits from *Schwab* is an incentive for us to recommend the use of *Schwab* rather than making such decision



based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our selection of *Schwab* as custodian and broker is in the best interest of our clients. Our selection is supported by the scope, quality and price of *Schwab's* services and not *Schwab's* services that benefit only us.

When feasible *Access* will aggregate client trades, and prices shall be allocated evenly among participating client accounts.

## Item 13 - Review of Accounts

### *Investment Advisory Services*

While accounts are monitored on an ongoing basis, we perform specific quarterly account reviews for clients who receive our Investment Advisory Services. However, if market conditions or other factors require it, we may conduct reviews more frequently. In addition, changes in tax laws, new investment information, or changes in a client's personal circumstances may trigger a review. We encourage all our investment advisory clients to discuss their needs, goals, and objectives with us and to keep their investment advisory representative informed of any changes.

As part of our service, all investment advisory clients receive written quarterly portfolio reports, which are reviewed by their Investment Advisory Representative.

### *Financial Planning Services*

As part of our Financial Planning service, we offer an annual review of our clients' financial situation, which includes updating their budget and cash flow schedules and providing a written report with our recommendations. This review is conducted when the client renews their FPA on an annual basis. The client's Investment Advisory Representative (IAR) will review these schedules and the written report with the client.

## Item 14 - Client Referrals and Other Compensation

### *A. Economic Benefit Provided by Third Parties for Advice Rendered to Client*

*Access Wealth* receives an economic benefit from *Schwab* in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at *Schwab*. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

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

In accordance with Rule 206 (4)-1 of the Investment Advisers Act of 1940, our firm provides cash or non-cash compensation directly or indirectly to unaffiliated persons for testimonials or endorsements (which include client referrals). Such compensation arrangements will not result in higher costs to the referred client. In this regard, our firm maintains a written agreement with each unaffiliated person that is compensated for testimonials or endorsements in an aggregate amount of \$1,000 or more (or the equivalent value in non-cash compensation) over a trailing 12-month period in compliance with Rule 206 (4)-1 of the Investment Advisers Act of 1940 and applicable state and federal laws. The following information will be disclosed clearly and prominently to referred prospective clients at the time of each testimonial or endorsement:

- Whether or not the unaffiliated person is a current client of our firm,
- A description of the cash or non-cash compensation provided directly or indirectly by our firm to the unaffiliated person in exchange for the referral, if applicable, and
- A brief statement of any material conflicts of interest on the part of the unaffiliated person giving the referral resulting from our firm's relationship with such unaffiliated person.

In cases where state law requires licensure of solicitors, our firm ensures that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of our firm. If our firm is paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

## Item 15 – Custody

### *Deduction of Advisory Fees*

While *Access Wealth* does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts, as further described below under “Third Party Money Movement.” All of our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

### *Third Party Money Movement*

On February 21, 2017, the SEC issued a no-action letter (“Letter”) with respect to Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.

- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## Item 16 - Investment Discretion

*Access Wealth* will manage your accounts on a discretionary basis. This means that we have the authority to trade securities in your account without obtaining your prior consent for each trade. However, we will still follow the investment objectives and guidelines set forth in your agreement and take into account any restrictions or preferences you have communicated to us. We do not have discretion over the withdrawal or transfer of funds from your account.

## Item 17 - Voting Client Securities

*Access Wealth* does not vote proxies on behalf of clients as part of our firm policy. Clients are responsible for voting their own proxies, and proxies and solicitations are sent to clients directly by the custodian or issuing company. If a client requests assistance with voting proxies, we will provide recommendations to them. However, if a conflict of interest exists, we will disclose it to the client.

## Item 18 - Financial Information

*Access Wealth* does not foresee any financial condition that would impair our ability to meet contractual commitments to clients.

Additionally, we do not require or solicit payment of fees more than \$1,200 per client more than six months in advance of services rendered.





**access WEALTH**

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**March 2025**

**Form ADV Part 2B Brochure Supplement**

**Supervised Persons:**

Howard M. Hook, CFP<sup>®</sup>, CPA

Howard S. Milove, CPA, PFS

Darren Zagarola, CFP<sup>®</sup>, CPA

Michael P. Chomiak, AAMS

Levan Chubinishvili, CFP<sup>®</sup>

Robert S. Epstein, ChFC<sup>®</sup>

This brochure supplement provides information about the above listed individuals that supplements the *Access Wealth* brochure. You should have received a copy of that brochure. Please contact Tracy A. Hagberg, Chief Compliance Officer if you did not receive *Access Wealth's* brochure or if you have any questions about the contents of this supplement. Additional information about the above-named supervised persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 - Educational Background and Business Experience

### **Howard M. Hook, CPA, CFP®**

Born – 1965

#### Formal Education after High School:

State University of NY at Binghamton – BS in Accounting

#### Business Background for the preceding five years:

Access Wealth – July 2001 – Present

DHH Advisors, LLC – October 2013 - Present

### **Howard Scott Milove, CPA, PFS**

Born – 1973

#### Formal Education after High School:

Syracuse University – BS in Accounting

#### Business Background for the preceding five years:

Access Wealth – July 2001 – Present

Purshe Kaplan Sterling Investments – May 2015 - Present

DHH Advisors, LLC – October 2013 - Present

### **Darren L. Zagarola, CPA, CFP®**

Born – 1971

#### Formal Education after High School:

King's College – BS in Accounting

#### Business Background for the preceding five years:

Access Wealth – August 2005 – Present

DHH Advisors, LLC – October 2013 - Present

### **Michael P. Chomiak, AAMS**

Born – 1971

#### Formal Education after High School:

William Paterson University – BA in Political Science

#### Business Background for the preceding five years:

Access Wealth – July 2001 – Present

**Levan Chubinishvili, CFP®**

Born – 1991

Formal Education after High School:

Franklin & Marshall College – BA in Business, Organizations and Society

Business Background for the preceding five years:

Access Wealth – June 2018 – Present

Hennion & Walsh, Inc. – July 2014 – June 2018

**Robert S. Epstein, ChFC®**

Born – 1949

Formal Education after High School:

City College of New York – BA in History

Business Background for the preceding five years:

Access Wealth – January 2007 - Present

The **CERTIFIED FINANCIAL PLANNER®**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 95,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to

test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**CERTIFIED PUBLIC ACCOUNTANT (CPA)** CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality,

disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

**PERSONAL FINANCIAL SPECIALIST (PFS)** The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct, and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

**CHARTERED FINANCIAL CONSULTANT (ChFC)** The ChFC designation indicates that your financial consultant has completed the most extensive educational program required for any financial services credential. Each ChFC has taken nine or more college-level courses on all aspects of financial planning from The American College, a non-profit educator with the highest level of academic accreditation. The average study time for the program is over 400 hours, and advisors frequently spend years earning this coveted distinction. Each ChFC must also complete a minimum of 30 hours of continuing education every two years, adhere to strict ethical standards, and meet extensive experience requirements to ensure that you get the professional financial advice you need.

**ACCREDITED ASSET MANAGEMENT SPECIALIST (AAMS)** - Individuals who hold the AAMS designation have completed a course of study encompassing investments, insurance, tax, retirement and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concept to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

## Item 3 - Disciplinary Information

*Access Wealth* has a commitment to full transparency and is obligated to disclose any legal or disciplinary events that may be material to a client's evaluation of our advisory business or the integrity of our management. We are proud to say that we do not have any required disclosures.

## Item 4 - Other Business Activities

### Broker-Dealer Affiliation

Howard S. Milove, an Investment Advisory Representative of *Access Wealth*, is also a Registered Representative of Purshe Kaplan Sterling Investments ("*PKS*"), a registered broker-dealer with CRD # 35747 and a member of FINRA and SIPC. While Howard may receive commissions for implementing recommendations for commissionable transactions in his capacity as a registered representative, clients are not obligated to follow these recommendations. *Access Wealth* and Howard S. Milove will not earn ongoing investment advisory fees in connection with any products or services implemented within the scope of Howard's capacity as a registered representative. Additionally, Howard spends approximately 5% of his time per month in his role as a registered representative of *PKS*. *Access Wealth* is committed to transparency and will disclose any potential conflicts of interest to our clients.

### Insurance Licensure

*Access Wealth* has several associated persons who are licensed insurance professionals. Clients are not obligated to implement any recommendations provided by the insurance professionals. However, if clients choose to implement the recommendations, the insurance professionals may receive customary commissions and other related revenue from the various insurance companies whose products are sold. Please note that commissions generated by insurance sales do not offset regular advisory fees.

### DHH Advisors, LLC

Darren Zagarola, Howard Milove, and Howard Hook are the owners of DHH Advisors, LLC ("*DHH*"), an SEC-registered investment adviser that provides comprehensive financial planning and investment advisory services. *Access Wealth* has entered into an agreement with *DHH*, under which *Access Wealth* provides back office and administrative services and support for a fee.



## Item 5 - Additional Compensation

Certain of the firms associated persons may receive compensation from the business activities referenced in the section above entitled "Other Business Activities".

## Item 6 – Supervision

The investment advisory and financial planning activities are supervised by Tracy A. Hagberg, Chief Compliance Officer and Howard S. Milove, Operations Manager. This is accomplished through various methods, including random reviews of client accounts, trading activities, email and correspondence. Tracy Hagberg and Howard Milove are supervised by the owners of the firm, Howard Hook and Darren Zagarola, in their respective roles.

The contact information for each is listed below:

Tracy Hagberg

Telephone # 973-740-2400

[thagberg@access-wealth.com](mailto:thagberg@access-wealth.com)

Howard Milove

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