

## Item 1 Cover Page

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March 30, 2026

**This brochure provides information about the qualifications and business practices of Stawnychy Financial Services, Inc. If you have any questions about the contents of this brochure, please contact us at 973-283-0024. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about Stawnychy Financial Services, Inc. also is available on the SEC’s website at <http://www.adviserinfo.sec.gov>.**

## **Item 2 Material Changes**

July 1, 2024 – Item 4 was amended to add advisory services to retirement plans.

May 19, 2025 – Stawnychy Financial Services reported client assets under management in its Form ADV annual updating amendment filing exceeding the threshold that requires registration with the SEC. Various disclosures in this brochure were amended to conform with SEC requirements.

March 30, 2026 – Item 4 was amended to remove disclosures concerning the selection of other advisors.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was March 19, 2025.

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#### Brochure

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## **Item 4 Advisory Business**

Stawnychy Financial Services, Inc. is a registered investment advisor firm since September 1997.

The principal owner of Stawnychy Financial Services, Inc. is Zoriana M. Stawnychy, President.

### Investment Advisory Services

Stawnychy Financial Services, Inc.'s ("Stawnychy Financial" or "Advisor") principal service is providing fee-based investment advisory services and financial planning services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The Advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use any of the following: exchange listed securities, warrants, corporate debt securities, variable annuities, municipal securities, mutual funds (including liquid alternative funds), United States government securities, and options on securities to accomplish this objective. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The Advisor may, on occasion, redistribute investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may purchase specific stocks to increase sector weighting and/or dividend potential. The Advisor may employ cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may sell positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

### Qualified Retirement Plan Consulting Services

Stawnychy Financial will provide consulting services to qualified retirement plans. The consulting service may include evaluating the plan and its operation including its trustee, custodial and recordkeeping arrangement, design, fiduciary compliance program, costs and fees associated with investments and service providers, required and elective contributions, employee communication and education program, and investment selection and monitoring process, including its investment policy statement. The Advisor will manage the investments of the plan on a discretionary basis (ERISA Section 3(38)).

At no time will the Advisor accept, maintain possession of, or have custodial responsibility for, the plan assets. Communicational and educational activities in which the Advisor engages related to participants in the plan shall be solely at the direction of the Plan Sponsor, and shall not be represented by the Advisor or plan sponsor as investment, tax or legal advice. The Advisor is not licensed to provide, shall not provide, nor be construed to provide, the services of an attorney or accountant.

### Financial Planning

Stawnychy Financial provides comprehensive financial, estate and business planning services. Stawnychy Financial gathers information regarding a client through a series of in depth meetings and review of documents supplied by the client. During these meetings a client's entire financial situation is discussed. Areas for discussion may include:

- income taxes
- cash flow
- asset allocation
- asset growth
- insurance
- group and corporate benefits

These areas are discussed in conjunction with the client's financial planning objectives and risk tolerance. During the planning process, financial models are developed that reflect the client's current financial situation and that determine the client's ability to reach their stated objectives and financial goals through forecasting their current financial situation. "What if" scenarios are presented to the client in order to help the client determine the optimal course of future financial action. Financial planning clients will receive a written report, which includes:

- an assessment of their assets
- identification of their objectives and issues
- concrete recommendations
- a statement of assets and liabilities
- generic investment recommendations

This plan may be updated for an additional fee at the client's request. Implementation of financial planning recommendations are at the sole discretion of the client.

Implementation will require that the client work closely with other advisors, such as attorneys, accountants, insurance agents and financial advisors. Services performed for the client are based solely on the client's needs. Certain clients may not require extensive planning. Instead, they may require a thorough examination of a certain aspect of their financial situation, such as, estate planning, retirement planning or education funding.

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Stawnychy Financial will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

Stawnychy Financial provides portfolio management services to wrap fee programs. Stawnychy Financial manages both the wrap fee accounts and non-wrap fee accounts, with the same investment strategy. Stawnychy Financial receives a portion of the wrap fee for its portfolio management services as described in Item 5 below.

As of December 31, 2025, the Advisor had the following client assets under management:

Discretionary	\$130,073,118
Non-discretionary	<u>1,139,935</u>
Total	\$131,213,053

## **Item 5 Fees and Compensation**

### Asset Management and Qualified Retirement Plan Consulting Fees

Pursuant to an Investment Advisory contract signed by each client, Stawnychy Financial will charge an annual Asset Management Fee, payable quarterly in advance, based on the value of portfolio assets of the account at the end of the previous quarter. New account fees are charged monthly in advance until the beginning of the next calendar quarter, and then convert to quarterly in advance. Fees for the first month will be prorated from the inception of the account to the end of the first month.

Asset Management Fees range up to 1.55% per annum based on several factors including whether the Asset Management Fee includes transaction costs or not, the type and complexity of the investment management strategy employed, and the size of the account or overall client relationship. Asset Management Fees may be reduced or waived for directors, officers, and employees of Stawnychy Financial at the discretion of management. These fees may be negotiated by Stawnychy Financial at its sole discretion. Asset Management Fees will generally be directly deducted from the client account on a quarterly basis. In some cases, fees will not be directly deducted and the client will be invoiced on a quarterly basis. For those clients whose fees are directly deducted, the client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian. The custodian will send a statement at least quarterly to the client and the Advisor will also send an invoice to the client outlining the fee calculation and time period covered, and the amount withdrawn from the client account each time the fee deduction invoice is sent to the qualified custodian.

Except in limited circumstances as described in Item 15, Stawnychy Financial generally does not accept or maintain custody of a client's funds or securities except for authorized fee deduction.

Stawnychy Financial offers investment management services to clients in both all-inclusive fee ("wrap fee") and non-wrap fee options. A wrap fee account is defined as one where a fee is charged to the account that is not based directly on transactions in the account, and includes both the investment management services and the costs of custody and executing the transactions in the account (except for short-term trading or redemption fees which will be paid by clients). In non-wrap fee accounts, the client will pay all custodial and securities execution and clearance fees to the custodian and executing broker directly out of their account plus the Asset Management Fee of the Advisor. Generally, clients in the wrap fee accounts will pay a higher Asset Management Fee than those where those costs are not included in the advisory fee. The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client.

### Fixed Fees

Stawnychy Financial charges a fixed fee for comprehensive financial planning services that will range from \$500 to \$15,000 depending on the scope and complexity of the services required, and will be negotiated in advance. Fixed fee-based clients are billed 25% of the fee upon the analysis of the client's current situation, 25% upon delivery of the initial proposed plan, 25% after final revisions, and the remaining 25% upon delivery of the final plan.

### Hourly Fee

Some clients will contract to have financial planning advice, financial analysis or specific consulting or administrative services provided based on an hourly fee. The Advisors hourly fee will be billed at rates ranging from \$100 per hour for clerical/administrative services to \$300 per hour for financial and business planning services provided by a senior CFP. The Advisor's hourly fees will be negotiated and agreed upon by the parties in advance. Hourly fee-based clients are billed on a monthly basis and upon completion of work performed.

All fees paid to Stawnychy Financial for investment advisory services are separate and distinct from the expenses charged by mutual funds and to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee and other fund expenses. Please see Item 12 for additional information on trading costs.

If in a non-wrap account, client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor's fee is separate and distinct from the custodian and execution fees. For wrap accounts, Stawnychy Financial will pay such custody and transaction costs out of the Asset Management Fee.

Stawnychy Financial's management fee is payable in advance. Upon termination with 30 days advance written notice, any fees paid in advance will be prorated to the date of termination and any unearned fee will be refunded to the client.

Neither Stawnychy Financial nor its supervised persons 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.

The Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without penalty or payment of the Advisor's fee.

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

Stawnychy Financial does not charge performance-based fees.

### **Item 7 Types of Clients**

The Advisor will offer its services to individuals, high net worth individuals, charitable organizations, municipal governments, and small businesses.

The Advisor does not have any minimum requirements for opening or maintaining accounts.

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

The Advisor may utilize fundamental or technical analysis techniques in formulating investment advice for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall.

The Advisor provides financial planning services, which includes investment planning, but does not manage portfolios for clients. The methods of analysis and investment strategies followed considered and recommended by the Advisor are utilized across all of the Advisor's financial planning clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

### **Item 9 Disciplinary Information**

Neither Stawnychy Financial nor its management persons have had any legal or disciplinary events, currently or in the past.

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

Neither the Advisor nor any of its management persons are registered as a representative of a broker-dealer or have an application pending to register as a broker-dealer.

Neither Stawnychy Financial nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

The Advisor does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a

mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” or offshore fund), futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Personnel of Stawnychy Financial, including Ms. Stawnychy, are also licensed and registered as insurance agents to sell life, accident and other lines of insurance for various insurance companies. Therefore, they will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. As with the brokerage commission and fee-based compensation noted above, the receipt of insurance commissions creates a conflict of interest. Clients are not obligated to use Stawnychy Financial or its personnel for insurance products services.

Stawnychy Financial does recommend or select other investment advisers for clients. See Item 4 above for further information.

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

Stawnychy Financial is registered with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1 that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the Advisor. In addition, the Code of Ethics governs personal trading by each employee of Stawnychy Financial deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Stawnychy Financial are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Stawnychy Financial collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Stawnychy Financial will provide a copy of the Code of Ethics to any client or prospective client upon request.

Stawnychy Financial does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

Stawnychy Financial and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Stawnychy Financial can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Stawnychy Financial has adopted a Code of Ethics as noted above.

Stawnychy Financial requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment Advisor Representatives of Stawnychy Financial may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Stawnychy Financial's policy is to require the trading of all relevant client accounts prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of Stawnychy Financial's personnel to verify compliance with this policy.

## **Item 12 Brokerage Practices**

If requested by the client, Stawnychy Financial may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Stawnychy Financial will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

Stawnychy Financial may receive proprietary research services or other products as a result of recommending a particular broker which may result in the client paying higher commissions than those obtainable through other brokers. If Stawnychy Financial does receive such products or services, it will follow procedures which ensure compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

The firm seeks to obtain the most favorable net results for clients' price, execution quality, services and commissions. Although the firm seeks competitive commission rates, it may pay commissions on behalf of clients which may be higher than those available from other brokers in order to receive other services. The firm may enter into such transactions so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services provided by the broker. The services that may be considered in this determination of reasonableness may include (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto. Such research furnished by broker-dealers may be used to service any or all of Stawnychy Financial's clients and may be used in connection with accounts other than those that pay commissions to the broker-dealers providing the research. In particular, third-party research provided by broker-dealers may be used to benefit all of the firm's clients. This creates a conflict of interest in that the firm has an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the clients' interest in receiving most favorable execution.

Benefits received may be used as soft dollars provided that:

- The service is primarily for the benefit of Stawnychy Financial's clients
- The commission rates are competitive with rates charged by comparable broker-dealers; and
- Stawnychy Financial does not guarantee a minimum amount of commissions to any broker-dealer.

Stawnychy Financial does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

Stawnychy Financial recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to Stawnychy Financial to direct all transactions through that broker-dealer in the investment advisory agreement.

Unrelated to the discussion of soft dollar arrangements noted above, Stawnychy Financial may recommend/require that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, and member of SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Stawnychy Financial is independently owned and operated and not affiliated with Schwab. Schwab provides Stawnychy Financial with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Stawnychy Financial client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Stawnychy Financial other products and services that benefit Stawnychy Financial but may not benefit its clients' accounts. These benefits may include national, regional or Stawnychy Financial specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Stawnychy Financial by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Stawnychy Financial in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Stawnychy Financial's fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Stawnychy Financial's accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to Stawnychy Financial other services

intended to help Stawnychy Financial manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Stawnychy Financial by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Stawnychy Financial. While, as a fiduciary, Stawnychy Financial endeavors to act in its clients' best interests, Stawnychy Financial's recommendation / requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to Stawnychy Financial of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

As an investment advisory firm, Stawnychy Financial has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Stawnychy Financial's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Stawnychy Financial may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

Stawnychy Financial does not permit clients to direct brokerage.

Stawnychy Financial may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of Stawnychy Financial's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. Stawnychy Financial may allocate trades

in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

### **Item 13 Review of Accounts**

The firm reviews client accounts on an annual basis, or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include Stawnychy Financial becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline.

For financial planning clients, Stawnychy Financial will present the analysis to the client, typically in the form of a written summary of the significant observations, assumptions and recommendations in each area Stawnychy Financial was engaged to provide advice. Upon completion of the plan delivery meeting, the engagement and the advisory relationship is typically concluded, unless specific post-plan advice has been agreed to as part of client Investment Advisory Agreement.

The client is encouraged to notify Stawnychy Financial if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers and others who are involved with client accounts. Stawnychy Financial does not provide its own regular reports to clients.

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

Stawnychy Financial is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Stawnychy Financial does not directly or indirectly compensate any person who is not a supervised person for client referrals.

### **Item 15 Custody**

Zoriana Stawnychy serves as a trustee on advisory clients' accounts which subjects Stawnychy Financial to the custody rules of the SEC. The rules include ensuring that the assets are held at a qualified custodian, that the qualified custodian provide statements directly to the client at least quarterly, having an independent public accountant perform a surprise examination annually to verify the assets, and maintaining certain books and records. As disclosed in Item 5, Stawnychy Financial deducts Asset Management Fees directly from client accounts, which is also considered custody by securities regulators. Stawnychy Financial complies with the custody requirements as set out by the SEC for assets for which Stawnychy Financial has custody. Stawnychy Financial encourages all clients to carefully review their account statements for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

### **Item 16 Investment Discretion**

Stawnychy Financial generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Stawnychy Financial.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Stawnychy Financial will be in accordance with each client's investment objectives and goals.

### **Item 17 Voting Client Securities**

Stawnychy Financial will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Stawnychy Financial cannot give any advice or take any action with respect to the voting of these proxies. The client and Stawnychy Financial agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

### **Item 18 Financial Information**

Stawnychy Financial does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and is therefore not required to provide financial information.

Stawnychy Financial has never been subject to a bankruptcy petition.