

**Item 1 Cover Page**

Stawnychy Financial Services, Inc. Wrap Brochure

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March 30, 2026

**This wrap fee program 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.**

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

## **Item 2 Material Changes**

July 1, 2024 – Item 4 was amended to add advisory services to qualified 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 – Items 4 and 6 were 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 wrap fee program brochure since the firm's last annual update of the brochure. The date of the last annual update of the wrap fee program brochure was March 19, 2025.

### Item 3 Table of Contents

Item 1 Cover Page .....	i
Item 2 Material Changes .....	ii
Item 3 Table of Contents .....	iii
Item 4 Services, Fees and Compensation.....	1
Item 5 Account Requirements and Types of Clients.....	3
Item 6 Portfolio Manager Selection and Evaluation .....	3
Item 7 Client Information Provided to Portfolio Managers .....	4
Item 8 Client Contact with Portfolio Managers .....	4
Item 9 Additional Information .....	4

## **Item 4 Services, Fees and Compensation**

### 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.

### 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 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.

The Advisor will pay all custodial and securities execution and clearance fees out of its Asset Management Fee (except for certain account fees and expenses including: short-term trading or redemption fees; margin costs; charges imposed directly by a mutual fund or exchange traded fund (such as management fees and other fund expenses); deferred sales charges; odd-lot differentials; transfer taxes; wire transfer and electronic fund fees; and other fees and taxes on brokerage accounts and securities transactions, as applicable, which will be paid by clients).

This method of treating transaction fees is typically characterized as a “wrap fee”, where the Asset Management Fee includes the investment advisory services as well as all transaction costs and the client pays only that Asset Management Fee and no other costs concerning the trading and maintaining of the account except as noted above. Clients in wrap fee accounts, with the transaction and custody costs included, will pay a higher Asset Management Fee than those clients of Stawnychy Financial that are not managed with a wrap fee (see Stawnychy Financial Form ADV Part 2A Brochure). The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client.

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.

The inclusive fee may cost the client more or less than purchasing such services separately depending on the number of transactions that occur in the account. Stawnychy Financial does not charge clients higher advisory fees based on their trading activity, but clients should be aware that the firm has an incentive to limit its trading activities in client accounts because the firm is charged for executed trades.

Investment advisor representatives of Stawnychy Financial are not compensated differently for clients that choose the inclusive fee arrangement versus the non-inclusive fee and therefore they do not have a financial incentive to recommend one method over the other.

Clients may request to terminate their advisory contract with Stawnychy Financial, in whole or in part, by providing advance written notice. Upon termination, fees earned by the Advisor but

not billed will be prorated to the date of termination and charged to the client. Client's advisory agreement with the Advisor is non-assignable without client's written approval.

### **Item 5 Account Requirements and 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 6 Portfolio Manager Selection and Evaluation**

Stawnychy Financial offers the wrap fee alternative to clients as a pricing option and does not utilize unaffiliated money managers to serve the needs of wrap fee clients.

Each client is assigned a Stawnychy Financial Investment Advisor Representative when they become a client. Each Investment Advisor Representative at Stawnychy Financial is responsible for managing the investment accounts of their assigned clients. The Stawnychy Financial Investment Advisor Representative will monitor the client account on an ongoing basis to ensure that the client needs, goals and objectives are being met.

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.

Clients need to be aware that investing in securities involves risk of loss that the client needs to be prepared to bear.

In addition to investment supervisory services, Stawnychy financial may provide comprehensive financial, estate and business planning services ("Financial Planning services") to some of its clients. The Advisor's Financial Planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial Planning Services may also include recommendations relating to investment strategies as well as tailored investment advice.

Financial Planning services are negotiated and contracted separately with clients from investment advisory services, and are billed on either a flat fee that ranges up to \$15,000, or at hourly rates ranging from \$100 per hour for clerical/administrative services to \$300 for financial planning services, depending on the scope and complexity of the services provided, and the resources required to provide the services.

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.

The Advisor does not charge performance-based fees.

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 7 Client Information Provided to Portfolio Managers**

In accordance with the Advisor's Privacy Policy, the Advisor does not communicate any non-public financial information to unaffiliated entities.

#### **Item 8 Client Contact with Portfolio Managers**

The Advisor does not place any restriction on the client's ability to contact and consult with their Investment Advisor Representatives and encourages clients to communicate with their Investment Advisor Representatives whenever their circumstances change that may cause a change to their investor profile.

#### **Item 9 Additional Information**

Neither the Advisor nor its management team has had any material legal or disciplinary events, currently or in the past.

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 the Advisor nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Investment Advisor Representatives for Advisor are also licensed and registered as insurance agents to sell life, health, and accident 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. This creates a conflict of interest because of the receipt of additional compensation by the Investment Advisor Representatives. Clients are not obligated to use the Investment Advisor Representatives for insurance product services. However, in such instances, there is no advisory fee associated with these insurance products.

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 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. 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 wrap client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by Stawnychy Financial 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.

None of the above-mentioned benefits that Stawnychy Financial receives from Schwab are under a soft dollar arrangement as there is no soft dollar arrangement in place between Stawnychy Financial and Schwab.

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.

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.

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.

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.

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 discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Stawnychy Financial does become aware of any such financial condition, this brochure will be updated and clients will be notified.

Stawnychy Financial has never been subject to a bankruptcy petition.