

**Form ADV Part 2A Brochure Supplement**

**October 19, 2023**



**SHOREHAVEN WEALTH PARTNERS, LLC**

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This brochure provides information about the qualifications and business practices of ShoreHaven Wealth Partners, LLC (hereinafter "ShoreHaven Wealth Partners" or the "Firm"). If you have any questions about the contents of this brochure, please contact the Firm at the telephone number listed above. 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 the Firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The Firm is a registered investment adviser. Registration does not imply any level of skill or training.

## Item 2 Material Changes

In this Item, ShoreHaven Wealth Partners is required to discuss any material changes that have been made to the brochure since the last annual amendment.

Since the filing of our last annual updating amendment, dated February 28, 2023, we have the following material changes to report:

- Item 5-Fees and Compensation, Item 10-Other Financial Industry Activities and Affiliations, and Item 12-Brokerage Practices - have been updated to reflect the removal of Purshe Kaplan Sterling Investments, Inc. ("PKS") as broke-dealer for commissionable activities.

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## Item 4 Advisory Business

ShoreHaven Wealth Partners, LLC ("ShoreHaven Wealth Partners" or the "Firm") offers a variety of advisory services, which include financial planning, consulting, and investment management services. Prior to ShoreHaven Wealth Partners rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with ShoreHaven Wealth Partners setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement").

ShoreHaven Wealth Partners filed for registration as an investment adviser in June 2020 and is owned by Lawrence Durso, Michael Durso and Michael Lombardi. As of January 13, 2023, the Firm has \$361,431,089 in assets under management, \$342,016,778 of which are discretionary and \$19,414,311 of which are non-discretionary.

While this brochure generally describes the business of ShoreHaven Wealth Partners, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or other persons who provide investment advice on ShoreHaven Wealth Partners' behalf and are subject to the Firm's supervision or control.

### Financial Planning and Consulting Services

ShoreHaven Wealth Partners offers clients a broad range of financial planning and consulting services, which include any or all of the following functions:

- Business Planning
- Cash Flow Forecasting
- Trust and Estate Planning
- Financial Reporting
- Investment Consulting
- Insurance Planning
- Retirement Planning
- Risk Management
- Charitable Giving
- Distribution Planning
- Tax Planning
- Education Planning

While each of these services is available on a stand-alone basis, certain of them can also be rendered in conjunction with investment portfolio management as part of a comprehensive wealth management engagement (described in more detail below).

In performing these services, ShoreHaven Wealth Partners is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.,) and is expressly authorized to rely on such information. ShoreHaven Wealth Partners recommends certain clients engage the Firm for additional related services, its Supervised Persons in their individual capacities as insurance agents or registered representatives of a broker-dealer and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage ShoreHaven Wealth Partners or its affiliates to provide (or continue to provide) additional services for compensation, including investment management services. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by ShoreHaven Wealth Partners under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to

promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising ShoreHaven Wealth Partners' recommendations and/or services.

### **Investment and Wealth Management Services**

ShoreHaven Wealth Partners manages client investment portfolios on a discretionary or non-discretionary basis. In addition, ShoreHaven Wealth Partners provides certain clients with wealth management services which include a broad range of financial planning and consulting services as well as discretionary management of investment portfolios.

ShoreHaven Wealth Partners primarily allocates client assets among various exchange-traded funds ("ETFs"), mutual funds, and independent investment managers through separately managed accounts or subadvisory relationships ("Independent Managers") in accordance with their stated investment objectives. Where appropriate the Firm may also recommend alternative investments and cryptocurrencies.

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios, but clients should not assume that these assets are being continuously monitored or otherwise advised on by the Firm. Clients can engage ShoreHaven Wealth Partners to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, ShoreHaven Wealth Partners directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider and clients may be responsible to implement the recommendations depending on the authority the Firm is given by the product's provider.

ShoreHaven Wealth Partners tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. ShoreHaven Wealth Partners consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify ShoreHaven Wealth Partners if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if ShoreHaven Wealth Partners determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

### **Retirement Plan Consulting Services**

ShoreHaven Wealth Partners provides various consulting services to qualified employee benefit plans and their fiduciaries. This suite of institutional services is designed to assist plan sponsors in structuring, managing and optimizing their corporate retirement plans. Each engagement is individually negotiated and customized, and includes any or all of the following services:

- Plan Design and Strategy
- Plan Review and Evaluation
- Executive Planning & Benefits
- Investment Selection
- Plan Fee and Cost Analysis
- Plan Committee Consultation
- Fiduciary and Compliance
- Participant Education

As disclosed in the Advisory Agreement, certain of the foregoing services are provided by ShoreHaven Wealth Partners as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), each plan sponsor is provided with a written description of ShoreHaven Wealth Partners' fiduciary status, the specific services to be rendered and all direct and indirect compensation the Firm reasonably expects under the engagement.

### **Use of Independent Managers**

As mentioned above, ShoreHaven Wealth Partners selects certain Independent Managers to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an Independent Manager are set forth in a separate written agreement with the designated Independent Manager. That agreement can be between the Firm and the Independent Manager (often called a subadvisor) or the client and the Independent Manager (sometimes called a separate account manager). The Independent Managers may also be accessed through a TAMP or other platform of managers. In addition to this brochure, clients will typically also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

ShoreHaven Wealth Partners evaluates a variety of information about Independent Managers, which includes the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. ShoreHaven Wealth Partners also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

ShoreHaven Wealth Partners continues to provide services relative to the discretionary selection of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers. ShoreHaven Wealth Partners seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

### **Investment Management and Transactions**

The development and maintenance of the ShoreHaven Wealth Partners Models, is materially supported by BlackRock Fund Advisors and/or its affiliates, including BlackRock Investments, LLC (collectively, "BlackRock"), which provides ShoreHaven Wealth Partners with investment research, model recommendations and marketing support at no cost. Research and recommendations provided by BlackRock to ShoreHaven Wealth Partners, however, predominantly favor the use of iShares ETFs, which are distributed by BlackRock. While ShoreHaven Wealth Partners is under no obligation to utilize iShares ETFs in the management of the ShoreHaven Wealth Partners Models, such models will predominantly and sometimes exclusively utilize iShares ETFs in their construction. This creates a material conflict of interest for ShoreHaven Wealth Partners as the receipt of such services from

BlackRock reduces ShoreHaven Wealth Partners' operating costs, which creates an incentive for ShoreHaven Wealth Partners to recommend and utilize products sponsored or distributed by BlackRock in the management of all client accounts.

### **Use of BlackRock Fund Advisers**

BlackRock Fund Advisors BlackRock Fund Advisors ("BlackRock", CRD No. 105247) has granted ShoreHaven Wealth Partners with access to its Aladdin® Platform, a portfolio management and risk analytics operating system, as well as marketing support at no cost to ShoreHaven Wealth Partners. Investment models generated by the Aladdin® Platform are used by ShoreHaven Wealth Partners in the development and maintenance of the Models and their related series. The investment models generated by the Aladdin® Platform predominantly and sometimes exclusively utilize iShares ETFs, which are sponsored, distributed and/or advised by BlackRock. ShoreHaven Wealth Partners receipt of investment research, models and/or technology from BlackRock creates a conflict of interest for ShoreHaven Wealth Partners because the receipt of these benefits reduces ShoreHaven Wealth Partners' operating costs, which, in turn, creates an incentive for ShoreHaven Wealth Partners to recommend and/or use iShares ETFs and/or other BlackRock products in the investment management of client accounts. BlackRock does not provide and is not responsible for providing investment advice to clients of ShoreHaven Wealth Partners, does not participate in or make any investment decisions on behalf of ShoreHaven Wealth Partners or clients of ShoreHaven Wealth Partners, does not endorse any investment decision or recommendation made by ShoreHaven Wealth Partners or its IARs, and has no obligation to continue to provide ShoreHaven Wealth Partners with its investment models and/or access to the Aladdin® Platform. In addition to investment research, models and/or technology, BlackRock provides or may provide discounted or free attendance to conferences, meetings and other educational or social events, which may include full coverage of travel expenses to such events. Clients should be aware that the receipt of these benefits creates a conflict of interest for ShoreHaven Wealth Partners as it creates another incentive for ShoreHaven Wealth Partners to recommend the use of iShares ETFs and/or other BlackRock products in the investment management of client accounts. ShoreHaven Wealth Partners addresses these conflicts of interest by (1) providing disclosure of the relationship and the associated conflicts of interest to clients in this Wrap Fee Program Brochure and (2) reminding clients that they have the ability to impose reasonable restrictions on the securities or types of securities to be held in their portfolios, including a restriction on the purchase and/or use of investment products associated with BlackRock.

### **Tax Transition and Overlay Services**

ShoreHaven Wealth Partners may enter into a sub-advisory agreement (the "Implementation Services Agreement") with certain registered investment advisers ("RIAs") to provide tax transition and overlay services ("Tax Transition and Overlay Services") to certain non-qualified clients of such RIAs ("Sub-Advised Clients") with respect to certain model portfolios. Such RIAs will have also entered into an agreement with BlackRock with respect to certain non-discretionary model portfolios provided by BlackRock (as described above). As noted above, such model portfolios provided by BlackRock or its affiliate will include (i) all Affiliated Funds or (ii) a significant allocation to Affiliated Funds and the remaining allocation to External Products, subject to parameters set by BlackRock. Pursuant to the Implementation Services Agreement, an RIA or its supervised personnel (its "Access Persons") may engage ShoreHaven Wealth Partners to manage a Sub-Advised Client account in a tax aware manner and consistent with the risk profile of a particular model portfolio selected by such RIA or its Access Person, subject to certain guidelines provided to the RIA or its Access Person (the "Guidelines"). The RIA is responsible for determining the suitability of a particular model portfolio for the Sub-Advised Clients. The Tax Transition and Overlay Services are provided by ShoreHaven Wealth Partners. Such Tax Transition and Overlay Services seek to improve after-tax returns for a Sub-Advised Client account while aligning the client account with the risk/return profile of the applicable model portfolio, subject to any Sub-Advised Client-specific Guidelines. Ongoing trading of such Sub-Advised Client accounts by ShoreHaven Wealth Partners will occur to accommodate client activity, cash

management, tax loss harvesting, tracking error improvement, and periodic rebalancing of the applicable model portfolio. The actual holdings in a Sub-Advised Client account, and the performance of such account, may differ from the holdings and performance of the model portfolio due to the Guidelines applicable to such account and the trading of such account in a tax-aware manner. Information relating to the model portfolios, including brochures and fact sheets, are available through the portal. ShoreHaven Wealth Partners trades a Sub-Advised Client account and enters into transactions on the basis of tax information maintained by the Adviser and the custodian of the account and consistent with ShoreHaven Wealth Partners' wash sale guidelines, which may be updated by ShoreHaven Wealth Partners from time to time. ShoreHaven Wealth Partners cannot guarantee the accuracy of any such tax information. ShoreHaven Wealth Partners does not provide tax advice, and proper tax treatment of transactions, including the application of the wash sale rules, should be determined by the Sub-Advised Clients' independent tax advisor. ShoreHaven Wealth Partners has no responsibility with respect to any tax reporting and filings that may be required by Sub-Advised Clients in connection with the transactions taken in the Sub-Advised Client accounts resulting from the Tax Transition and Overlay Services. In addition, ShoreHaven Wealth Partners cannot be responsible for the actions of other managers or actions by a Sub-Advised Client that may cause such Sub-Advised Clients to be disallowed the loss on the sale of a particular security in its account. There is currently no fee charged by ShoreHaven Wealth Partners for any such Tax Transition and Overlay Services. However, Affiliated Funds included in the Client accounts pay fees to ShoreHaven Wealth Partners or its affiliates for providing management, administrative, or other services. In addition, ShoreHaven Wealth Partners may require that RIAs meet certain assets under management thresholds across applicable Sub-Advised Client accounts in connection with the provision of such Tax Transition and Overlay Services.

#### **Use of Dynasty Financial Partners, LLC TAMP**

ShoreHaven Wealth Partners has entered into a contractual relationship with Dynasty Financial Partners, Dynasty Wealth management and its affiliates ("Dynasty"), which provides ShoreHaven Wealth Partners with operational and back office support including access to a network of service providers. Through the Dynasty network of service providers, ShoreHaven Wealth Partners may receive preferred pricing on trading technology, reporting, custody, brokerage, compliance and other related services. Dynasty works closely with the Firm on the operational and investment set-up to fully understand the Firm's objectives and transition capabilities. Dynasty will initially provide the Firm's chief compliance officer as well as control person in setting up the Firm. Dynasty charges a "Platform Fee," for which, unless otherwise disclosed, the client will be charged, separate from and in addition to such client's annual investment management fee, as described in Item 5 below. In addition, Dynasty's subsidiary, Dynasty Wealth Management, LLC ("DWM") is an SEC registered investment adviser, that provides access to a range of investment services including: separately managed accounts ("SMA"), mutual fund and ETF asset allocation strategies, and unified managed accounts ("UMA") managed by external third party managers (collectively, the "Investment Programs"). ShoreHaven Wealth Partners and its clients may separately engage the services of Dynasty and/or its subsidiaries to access the Investment Programs. Under the SMA and UMA programs, ShoreHaven Wealth Partners will maintain the ability to select the specific, underlying third party managers that will, in turn, have day-to-day discretionary trading authority over the requisite client assets.

DWM sponsors an investment management platform (the "Platform" or the "TAMP") that is available to the advisers in the Dynasty Network, such as ShoreHaven Wealth Partners. Through the Platform, DWM and Dynasty collectively provide certain technology, administrative, operations and advisory support services that allow advisers to manage their own portfolios and access independent third-party managers that provide discretionary services in the form of traditional managed accounts and investment models. Advisers can allocate all or a portion of client assets among the different independent third-party managers via the Platform. Advisers may also use the model management



feature of the TAMP by creating their own asset allocation model and underlying investments that comprise the model. Through the model management feature, advisers may be able to outsource the implementation of trade orders and periodic rebalancing of the model when needed.

ShoreHaven Wealth Partners will maintain the direct contractual relationship with each client and obtain, through such agreements, the authority to engage independent third-party managers, DWM and/or Dynasty, as applicable, for services rendered through the Platform in service of such client. ShoreHaven Wealth Partners may delegate discretionary trading authority to DWM and/or independent third-party managers to effect investment and reinvestment of client assets with the ability to buy, sell or otherwise effect investment transactions and allocate client assets. If a client is participating in certain Investment Programs, DWM or the designated manager, as applicable, is also authorized without prior consultation of ShoreHaven Wealth Partners or the client to buy, sell, trade or allocate such client's assets in accordance with the client's designated portfolio and to deliver instructions to the designated broker-dealer and/or custodian of such client's assets.

### **IRA Rollover Recommendations**

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:]

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

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

ShoreHaven Wealth Partners offers services on a fee basis, which includes fixed fees, as well as fees based upon assets under management or advisement. Additionally, certain of the Firm's Supervised Persons, in their individual capacities, offers securities brokerage services and/or insurance products under a separate commission-based arrangement.

### **Financial Planning and Consulting Fees**

ShoreHaven Wealth Partners charges a fixed fee for providing financial planning and consulting services under a stand-alone engagement. These fees are negotiable, but range from \$1,000 to \$10,000, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. If the client engages the Firm for additional investment advisory services, ShoreHaven Wealth Partners can offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement and ShoreHaven Wealth Partners requires one-half of the fee payable upon execution of the Advisory Agreement. The outstanding balance is due upon delivery of the financial plan or completion of the agreed upon services. The Firm does not, however, take receipt of \$1,200 or more in prepaid fees, six or more months in advance of services rendered.

### **Investment Management Fees**

ShoreHaven Wealth Partners offers investment management services for an annual fee based on the amount of assets under the Firm's management. This management fee varies in accordance with the following fee schedule:

<b>PORTFOLIO VALUE</b>	<b>BASE FEE</b>
Up to \$1,000,000	1.50%
\$1,000,001-\$3,000,000	1.25%
\$3,000,001-\$6,000,000	1.00%
\$6,000,001-\$10,000,000	0.90%
\$10,000,001 -\$25,000,000	0.75%
Above \$25,000,000	0.60%

ShoreHaven Wealth Partners' annual fee is billed and payable on a pro-rata basis, quarterly in advance, based upon the market value of the assets being managed by the Firm on the last day of the previous quarter. Adjustments will be made for deposits and withdrawals in excess of \$50,000 during the quarter. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, ShoreHaven Wealth Partners' fees will apply on a pro rata basis, which means that the management fee is payable in proportion to the number of days in the quarter for which you are a client. In the event the portfolio management agreement is terminated, the fee for the final billing period will be prorated through the effective date of termination, and the outstanding or unearned portion of the fee will be charged or refunded to the client, as appropriate. The Firm's management fee is negotiable, depending on individual client circumstances.

Additionally, for asset management services the Firm provides with respect to certain client holdings (e.g., held-away assets, accommodation accounts, alternative investments, etc.), ShoreHaven Wealth Partners can negotiate a fee rate that differs from the range set forth above.

### **Retirement Plan Consulting Fees**

ShoreHaven Wealth Partners charges as fixed project-based fee to provide clients with retirement plan consulting services. Each engagement is individually negotiated and tailored to accommodate the needs of the individual plan sponsor, as memorialized in the Agreement. These fees vary, based on the scope of the services to be rendered and assets to be advised on and can be negotiated as a fixed or asset-based fee.

**Fee Discretion**

ShoreHaven Wealth Partners may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, pro bono activities, or competitive purposes.

**Additional Fees and Expenses**

In addition to the advisory fees paid to ShoreHaven Wealth Partners, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, reporting charges, fees charged by the Independent Managers, margin and other borrowing costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund 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. The Firm's brokerage practices are described at length in Item 12, below.

As discussed above, ShoreHaven Wealth Partners uses Dynasty's TAMP services. TAMP related charges are not included in the Firm's investment management fee. Clients will be charged, separate from and in addition to the investment management fee, any applicable Platform Fees as well as applicable Independent Manager fees. ShoreHaven Wealth Partners does not receive any portion of the fees paid directly to Dynasty or the service providers made available through its platform, including the Independent Managers.

Each of the Platform Fee and independent manager fees are determined by the particular program(s) and manager(s) with which a client's assets are invested, and are calculated based upon a percentage of the assets under management, as applicable. The Platform Fee generally ranges from 0 - .45% annually, independent fixed income manager fees generally range from 0 - .90% annually, and independent equity manager fees generally range from 0 - 1.50% annually.

Clients will note the total fee reflected on their custodial statement will represent the sum of ShoreHaven Wealth Partners' investment management fee, Platform Fee(s) and Independent Manager fee(s), accordingly. Clients should review such statements to determine the total amount of fees associated with their requisite investments, and should review their investment management agreement with ShoreHaven Wealth Partners to determine the investment management fee paid to the Firm.

**Direct Fee Debit**

Clients provide ShoreHaven Wealth Partners and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to ShoreHaven Wealth Partners. Alternatively, clients may elect to have ShoreHaven Wealth Partners send a separate invoice for direct payment.

**Use of Margin**

ShoreHaven Wealth Partners can recommend that certain clients utilize margin in the client's investment portfolio or other borrowing. ShoreHaven Wealth Partners only recommends such borrowing for non- investment needs, such as bridge loans and other financing needs. The Firm's fees are determined based upon the value of the assets being managed gross of any margin or borrowing.

## **Account Additions and Withdrawals**

Clients can make additions to and withdrawals from their account at any time, subject to ShoreHaven Wealth Partners' right to terminate an account. Additions can be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or declines to accept particular securities into a client's account. Clients can withdraw account assets on notice to ShoreHaven Wealth Partners, subject to the usual and customary securities settlement procedures. However, the Firm designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. ShoreHaven Wealth Partners may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

## **Held Away Assets**

The Firm utilizes a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

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

ShoreHaven Wealth Partners does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

## **Item 7 Types of Clients**

ShoreHaven Wealth Partners offers services to individuals, trusts, estates, charitable organizations, corporations and other business entities, retirement plans, and guardianships.

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

### **Methods of Analysis and Investment Strategies**

Financial planning can be an intricate puzzle, with more than one path or outcome. Through ShoreHaven Wealth Partners' (and its Supervised Persons') long experience working with families and individuals with unique situations, the Firm has honed a successful personalized approach that it calls **PORT**: Planning for Opportunities, Risk and Timing. ShoreHaven Wealth Partners' PORT Approach utilizes what the Firm believes is a time-tested process of putting all the puzzle pieces together for a meaningful analysis.

*Define the relationship.* ShoreHaven Wealth Partners' meets with clients to discuss the expectations for the roles the Firm will have during the personal financial planning process, how decisions will be made, and the duration of the relationship. ShoreHaven Wealth Partners' will detail the services to be provided and how the Firm is compensated.

*Gather information and set goals.* ShoreHaven Wealth Partners gathers each client's financial information and other data needed to create a personal financial plan. The Firm also helps clients in identifying and prioritizing their personal goals. ShoreHaven Wealth Partners may uncover needs not previously discussed.

*Analyze current financial status.* As part of the Firm's SWOT analysis, ShoreHaven Wealth Partners will identify each client's financial strengths and weaknesses, along with opportunities and threats to financial well-being. The analysis will help the Firm prepare the appropriate recommendations for each client.

*Develop and communicate recommendations.* With the client's financial status understood and goals prioritized, ShoreHaven Wealth Partners develops a comprehensive financial plan, based on that client's needs and objectives. ShoreHaven Wealth Partners will meet with each client to discuss the Firm's customized recommendations and various options.

*Implement the recommendations.* To activate the client's financial plan, the Firm will assist in either implementing the recommendations or in coordinating the implementation with other knowledgeable and licensed professionals.

*Monitor the recommendations.* Because economic conditions and client financial situations change over time, ShoreHaven Wealth Partners provides periodic reviews of each client's financial plan at agreed upon intervals.

The first step in every client relationship begins with a discovery meeting, in this meeting ShoreHaven Wealth Partners will seek to understand each client's goals and create a comprehensive understanding of the client's financial life. A Goals Based Financial plan will be the foundation of ShoreHaven Wealth Partners' relationship and drive its investment process. In addition to the client's goals; learning the individual risk tolerance will be critical to the Firm's process. ShoreHaven Wealth Partners will put each client through a risk assessment which allows the Firm to target its investments to what it believes is a comfortable level of risk.

After creating the Financial Plan and a SWOT analysis; with the client's direct input, ShoreHaven Wealth Partners will assist the client and the client's family in determining the best investment allocation to meet the objectives and create an investment policy.

ShoreHaven Wealth Partners constructs portfolios for our clients using a mix of individual stocks, bonds, ETFs, exchange-traded notes, closed-end funds, mutual funds, structured notes, alternative investments and cryptocurrencies. In addition to its models, the Firm will use outside managers (Independent Managers) where necessary to gain exposure to certain asset classes.

If circumstances change in the financial markets, a client's life, or both, the Firm discusses the changes to the portfolio it considers prudent, and then implements the changes promptly. ShoreHaven Wealth Partners will work with clients' tax professionals and considers tax ramifications in choosing different investments. ShoreHaven Wealth Partners offers Taxable and Non-taxable versions of its models and strives to minimize taxes where possible.

ShoreHaven Wealth Partners investment solutions are screened and monitored daily as prudent attention and flexibility is required in today's fast-paced and ever-changing market. As an additional benefit, the Firm will provide clients with timely commentary on the macroeconomic landscape, as well as the Firm's rationale on any investment allocation changes that were completed throughout the month. The returns will be compared to current and appropriate benchmarks.

Due to the volatile nature of many asset classes, variances from the initial targeted allocations are expected to change. These strategies are monitored daily and will be re-allocated when ShoreHaven Wealth Partners' views of future market conditions change.

A very important factor in ShoreHaven Wealth Partners' decision-making process is the Behavioral aspect of the Firm's financial decisions. Behavioral Finance involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

### **Risk of Loss**

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to the Firm's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging the Firm to provide investment management services on their behalf.

#### Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of ShoreHaven Wealth Partners' recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that ShoreHaven Wealth Partners will be able to predict these price movements accurately or capitalize on any such assumptions.

#### Volatility Risks

The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

#### Fixed Income Securities

Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility.

#### Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's

holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

#### Use of Independent Managers

As stated above, ShoreHaven Wealth Partners selects certain Independent Managers to manage a portion of its clients' assets. In these situations, ShoreHaven Wealth Partners continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Managers' ability to successfully implement their investment strategies. In addition, ShoreHaven Wealth Partners does not have the ability to supervise the Independent Managers on a day-to-day basis.

#### Interest Rate Risks

Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

#### Digital Assets

We may invest client accounts in virtual currencies, crypto-currencies, and digital coins and tokens ("Digital Assets"). The investment characteristics of Digital Assets generally differ from those of traditional currencies, commodities or securities. Importantly, Digital Assets are not backed by a central bank or a national, supra-national or quasi-national organization, any hard assets, human capital, or other form of credit. Rather, Digital Assets are market-based: a Digital Asset's value is determined by (and fluctuates often, according to) supply and demand factors, the number of merchants that accept it, and/or the value that various market participants place on it through their mutual agreement, barter or transactions.

#### Price Volatility of Digital Assets

A principal risk in trading Digital Assets is the rapid fluctuation of market price. High price volatility undermines Digital Assets' role as a medium of exchange as consumers or retailers are much less likely to accept them as a form of payment. The value of client portfolios relates in part to the value of the Digital Assets held in the client portfolio and fluctuations in the price of Digital Assets could adversely affect the value of a client's portfolio. There is no guarantee that a client will be able to achieve a better than average market price for Digital Assets or will purchase Digital Assets at the most favorable price available. The price of Digital Assets achieved by a client may be affected generally by a wide variety of complex and difficult to predict factors such as Digital Asset supply and demand; rewards and transaction fees for the recording of transactions on the blockchain; availability and access to Digital Asset service providers (such as payment processors), exchanges, miners or other Digital Asset users and market participants; perceived or actual Digital Asset network or Digital Asset security vulnerability; inflation levels; fiscal policy; interest rates; and political, natural and economic events.

### Digital Asset Service Providers

Several companies and financial institutions provide services related to the buying, selling, payment processing and storing of virtual currency (i.e., banks, accountants, exchanges, digital wallet providers, and payment processors). However, there is no assurance that the virtual currency market, or the service providers necessary to accommodate it, will continue to support Digital Assets, continue in existence or grow. Further, there is no assurance that the availability of and access to virtual currency service providers will not be negatively affected by government regulation or supply and demand of Digital Assets.

Accordingly, companies or financial institutions that currently support virtual currency may not do so in the future.

### Custody of Digital Assets

Under the Advisers Act, SEC registered investment advisers are required to hold securities with "qualified custodians," among other requirements. Certain Digital Assets may be deemed to be securities. Currently, many of the companies providing Digital Assets custodial services fall outside of the SEC's definition of "qualified custodian", and many long-standing, prominent qualified custodians do not provide custodial services for Digital Assets or otherwise provide such services only with respect to a limited number of actively traded Digital Assets. Accordingly, clients may use non-qualified custodians to hold all or a portion of their Digital Assets.

### Government Oversight of Digital Assets

The regulatory schemes—both foreign and domestic—possibly affecting Digital Assets or a Digital Asset network may not be fully developed and subject to change. It is possible that any jurisdiction may, in the near or distant future, adopt laws, regulations, policies or rules directly or indirectly affecting a Digital Asset network, generally, or restricting the right to acquire, own, hold, sell, convert, trade, or use Digital Assets, or to exchange Digital Assets for either fiat currency or other virtual currency. It is also possible that government authorities may take direct or indirect investigative or prosecutorial action related to, among other things, the use, ownership or transfer of Digital Assets, resulting in a change to its value or to the development of a Digital Asset network.

### Private Investments/Limited Partnerships

Limited Partnerships: A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner does not usually invest any capital, but has management authority and unlimited liability. That is, the general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and confine their participation to their capital investment. That is, limited partners invest a certain amount of money and have nothing else to do with the business. However, their liability is limited to the amount of the investment. In the worst-case scenario for a limited partner, he/she loses what he/she invested. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership. Shorehaven Wealth Partners is a partner in various Limited Partnerships, which are offered to qualified clients.

## **Item 9 Disciplinary Information**

ShoreHaven Wealth Partners has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.



## Item 10 Other Financial Industry Activities and Affiliations

This item requires investment advisers to disclose certain financial industry activities and affiliations.

### **Licensed Insurance Agents**

A number of the Firm's Supervised Persons are licensed insurance agents and offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that ShoreHaven Wealth Partners recommends the purchase of insurance products where its Supervised Persons are entitled to insurance commissions or other additional compensation. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

### **Relationship with Dynasty Financial Partners, LLC**

As described herein, ShoreHaven Wealth Partners maintains a business relationship with Dynasty. Dynasty offers operational and back office core service support including access to a network of service providers. Through the Dynasty network of service providers, ShoreHaven Wealth Partners may receive preferred pricing on trading technology, transition support, reporting, custody, brokerage, compliance, and other related consulting services.

While ShoreHaven Wealth Partners believes this open architecture structure for operational services best serves the interests of its clients, this relationship may potentially present certain conflicts of interest due to the fact that Dynasty is paid by ShoreHaven Wealth Partners or its clients for the services referenced above. In light of the foregoing, ShoreHaven Wealth Partners seeks at all times to ensure that any material conflicts are addressed on a fully-disclosed basis and handled in a manner that is aligned with its clients' best interests. ShoreHaven Wealth Partners does not receive any portion of the fees paid directly to Dynasty, its affiliates or the service providers made available through Dynasty's platform. In addition, ShoreHaven Wealth Partners reviews such relationships, including the service providers engaged through Dynasty, on a periodic basis in an effort to ensure clients are receiving competitive rates in relation to the quality and scope of the services provided.

### **Stone Castle Cash Management**

The Adviser and its representatives may refer clients to invest in a high-yield federally insured cash account operated by Stone Castle Cash Management, LLC. ShoreHaven Wealth Partners may receive compensation for client participation in this product, such as an advisory fee or a percentage of the yield associated with this product.

A recommendation by ShoreHaven Wealth Partners that a client participate in this product presents a conflict of interest, as the receipt of related compensation may provide an incentive to recommend the product based on such compensation, rather than on a particular client's need. The client is not under any obligation to purchase this or any product(s) or services recommended by ShoreHaven Wealth Partners or its representatives. Clients are reminded that they may purchase or select other potentially similar products or services recommended by ShoreHaven Wealth Partners through parties from which ShoreHaven Wealth Partners does not stand to receive any additional benefit or compensation.

## Item 11 Code of Ethics

ShoreHaven Wealth Partners has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. ShoreHaven Wealth Partners' Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of ShoreHaven Wealth Partners' personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by money market funds; and iv) shares issued by other unaffiliated open-end mutual funds.

Clients and prospective clients may contact ShoreHaven Wealth Partners to request a copy of its Code of Ethics by contacting the Firm at the phone number on the cover page of this brochure.

## **Item 12 Brokerage Practices**

### **Recommendation of Broker-Dealers for Client Transactions**

ShoreHaven Wealth Partners recommends that clients utilize the custody, brokerage and clearing services of National Financial Services LLC and Fidelity Brokerage Services LLC (together with affiliates, "Fidelity") for investment management accounts. The final decision to custody assets with Fidelity is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. ShoreHaven Wealth Partners is independently owned and operated and not affiliated with Fidelity. Fidelity provides ShoreHaven Wealth Partners with access to its institutional trading and custody services, which are typically not available to retail investors.

Factors which ShoreHaven Wealth Partners considers in recommending Fidelity or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. Fidelity enables the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. Fidelity has also agreed to reimburse clients for exit fees associated with moving accounts to Fidelity. The reimbursement is only available up to a certain amount for all of the Firm's clients over a period of time. Fees are reimbursed on a first-come-first-served basis so that no clients are favored. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other Financial Institutions.

The commissions paid by ShoreHaven Wealth Partners' clients to Fidelity comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where ShoreHaven Wealth Partners determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. ShoreHaven Wealth Partners seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions may be cleared through other broker-dealers with whom the Firm and its custodians have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, the Client may be required to sign an additional agreement, and additional fees are likely to be charged.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker-dealers in return for investment research products and/or services which assist ShoreHaven Wealth Partners in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because ShoreHaven Wealth Partners does not have to produce or pay for the products or services.

ShoreHaven Wealth Partners periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

#### **Software and Support Provided by Financial Institutions**

ShoreHaven Wealth Partners receives without cost from Fidelity administrative support, computer software, related systems support, as well as other third party support as further described below (together "Support") which allow ShoreHaven Wealth Partners to better monitor client accounts maintained at Fidelity and otherwise conduct its business. ShoreHaven Wealth Partners receives the Support without cost because the Firm renders investment management services to clients that maintain assets at Fidelity. The Support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The Support benefits ShoreHaven Wealth Partners, but not its clients directly. Clients should be aware that ShoreHaven Wealth Partners' receipt of economic benefits such as the Support from a broker-dealer creates a conflict of interest since these benefits will influence the Firm's choice of broker-dealer over another that does not furnish similar software, systems support or services. In fulfilling its duties to its clients, ShoreHaven Wealth Partners endeavors at all times to put the interests of its clients first and has determined that the recommendation of Fidelity is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, ShoreHaven Wealth Partners receives the following benefits from Fidelity: i) receipt of duplicate client confirmations and bundled duplicate statements; ii) access to a trading desk that exclusively services its institutional traders; iii) access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and iv) access to an electronic communication network for client order entry and account information.

Fidelity also makes available to the Firm, at no additional charge, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by ShoreHaven Wealth Partners (within specified parameters). These research and brokerage services are used by the Firm to manage accounts for which it has investment discretion.

These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a certain amount of the advisor's clients' assets are maintained in accounts at Fidelity. Fidelity'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 client accounts maintained in its custody, Fidelity 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 Fidelity or that settle into Fidelity accounts.

Fidelity also makes available to the Firm other products and services that benefit the Firm but may not benefit its clients' accounts. These benefits may include national, regional or Firm specific educational events organized and/or sponsored by Fidelity. Other potential benefits may include occasional business entertainment of personnel of ShoreHaven Wealth Partners by Fidelity 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 ShoreHaven Wealth Partners 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 the Firm'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 the Firm's accounts, including accounts not maintained at Fidelity. Fidelity also makes available to ShoreHaven Wealth Partners other services intended to help the Firm 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, Fidelity may make available, arrange and/or pay vendors for these types of services rendered to the Firm by independent third parties. Fidelity 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 the Firm. While, as a fiduciary, ShoreHaven Wealth Partners endeavors to act in its clients' best interests, the Firm's recommendation that clients maintain their assets in accounts at Fidelity may be based in part on the benefits received and not solely on the nature, cost or quality of custody and brokerage services provided by Fidelity, which creates a potential conflict of interest. Without this arrangement, the Firm might be compelled to purchase the same or similar services at its own expense.

### **Brokerage for Client Referrals**

ShoreHaven Wealth Partners does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the Financial Institutions or other third party.

### **Directed Brokerage**

The client may direct ShoreHaven Wealth Partners in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution and the Firm will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by ShoreHaven Wealth Partners (as described above). As a result, the client may pay higher commissions or other transaction costs, greater spreads or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, ShoreHaven Wealth Partners may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

### **Trade Aggregation**

Transactions for each client will be effected independently, unless ShoreHaven Wealth Partners decides to purchase or sell the same securities for several clients at approximately the same time. ShoreHaven Wealth Partners may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among ShoreHaven Wealth Partners' clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which ShoreHaven Wealth Partners' Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. ShoreHaven Wealth Partners does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

## Item 13 Review of Accounts

### Account Reviews

ShoreHaven Wealth Partners monitors client portfolios on a continuous and ongoing basis and regular account reviews are conducted on at least an annual basis. Such reviews are conducted by the Firm's Principals and/or investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals and objectives with ShoreHaven Wealth Partners and to keep the Firm informed of any changes thereto.

### Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from ShoreHaven Wealth Partners and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from ShoreHaven Wealth Partners or an outside service provider.

## Item 14 Client Referrals and Other Compensation

The Advisor engages independent solicitors to provide client referrals. If a client is referred to us by a solicitor, this practice is disclosed to the client in writing by the solicitor and the Advisor pays the solicitor out of its own funds—specifically, the Advisor generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. The Advisor's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

## Item 15 Custody

ShoreHaven Wealth Partners is deemed to have custody of client funds and securities because the Firm is given the ability to debit client accounts for payment of the Firm's fees. As such, client funds and securities are maintained at one or more Financial Institutions that serve as the qualified custodian with respect to such assets. Such qualified custodians will send account statements to clients at least once per calendar quarter that typically detail any transactions in such account for the relevant period.

In addition, as discussed in Item 13, ShoreHaven Wealth Partners will also send, or otherwise make available, periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from ShoreHaven Wealth Partners. Any other custody disclosures can be found in the Firm's Form ADV Part 1.

ShoreHaven Wealth Partners also anticipates having custody due to clients giving the Firm limited power of attorney in a standing letter of authorization ("SLOA") to disburse funds to one or more third parties as specifically designated by the client. In such circumstances, the Firm will implement the steps in the SEC's no-action letter on February 21, 2017 which includes (in summary): i) client will provide instruction for the SLOA to the custodian; ii) client will authorize the Firm to direct transfers to the specific third party; iii) the custodian will perform appropriate verification of the instruction and provide a transfer of funds notice to the client promptly after each transfer; iv) the client will have the ability to terminate or change the instruction; v) the Firm will have no authority or ability to designate or

change the identity or any information about the third party; vi) the Firm will keep records showing that the third party is not a related party of the Firm or located at the same address as the Firm; and vii) the custodian will send the client an initial and annual notice confirming the SLOA instructions.

## **Item 16 Investment Discretion**

ShoreHaven Wealth Partners is given the authority to exercise discretion on behalf of clients. ShoreHaven Wealth Partners is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. ShoreHaven Wealth Partners is given this authority through a power-of-attorney included in the agreement between ShoreHaven Wealth Partners and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). ShoreHaven Wealth Partners takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made;
- The broker-dealer that executes trades (in the case of a prime brokerage relationship); and
- The Independent Managers to be hired or fired.

## **Item 17 Voting Client Securities**

ShoreHaven Wealth Partners does not accept the authority to vote a client's securities (i.e., proxies) on their behalf. Clients receive proxies directly from the Financial Institutions where their assets are custodied and may contact the Firm at the contact information on the cover of this brochure with questions about any such issuer solicitations. In limited circumstances, the Firm may recommend that clients provide proxy voting authority to the Independent Managers.

## **Item 18 Financial Information**

ShoreHaven Wealth Partners is not required to disclose any financial information listed in the instructions to Item 18 because:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.