SYNERGY
WEALTH MANAGEMENT
TRANSPARENT • EDUCATIONAL • A UNIQUE PERSPECTIVE

SYNERGY WEALTH MANAGEMENT LLC

FIRM BROCHURE
(ADV PART 2A)

MARCH 23, 2023

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This brochure provides information about the qualifications and business practices of Synergy Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact Fredrick Iacovoni at (616) 285-7818. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Synergy Wealth Management, LLC is a registered investment adviser. Registration of an Investment Advisor does not imply any level of skill or training. The written communications of an Advisor provide you with information with which you determine whether to hire or retain an Advisor.

Additional information about Synergy Wealth Management LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Advisor's CRD number is 174633.

2. MATERIAL CHANGES

There have the following material changes to report since our firm's last annual update, dated March 24, 2022:

- Item 5 – Fee schedule for Portfolio Management services has been revised. Please refer to this Item for additional details regarding the new fee schedule.

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4. Advisory Business

A. Ownership/Advisory History

Synergy Wealth Management LLC ("Advisor") (Also, known as SynergyWM or SynergyWM, LLC) was established as a Michigan Limited Liability Company on January 8, 2015. It was subsequently registered as a Michigan investment adviser. Advisor's owner is Fredrick R. Iacovoni ("Mr. Iacovoni"). Additional information about Mr. Iacovoni can be found under Item 19 – Requirements for State-Registered Advisers.

B. Advisory Services Offered

Advisor's services include portfolio management services, institutional retirement advisory services, and the creation of financial plans for clients. Advisor meets with a client to evaluate the individual client's investment needs, goals, and objectives. After the evaluation, Advisor recommends one of the services described below.

i. Financial Planning

Advisor offers clients financial planning services to evaluate their financial situation, goals, and risk tolerance. Through a series of personal interviews and the use of questionnaires, Advisor will collect pertinent data, identify goals, objectives, financial problems, potential solutions, prepare specific recommendations, and implement recommendations. As a result of these actions, Advisor's advice may be provided on financial and cash management, risk management, financial issues relating to divorce or marital issues, estate planning, tax issues, stretch IRA planning, Investment Planning/Asset Allocation, retirement planning, educational funding, goal setting, or other needs as identified by the client and Advisor. Advisor may offer broad-based planning services or the client may desire advice on certain planning components; the Advisor can tailor services as desired by the client. At the conclusion of the financial planning service Advisor will present the client with a written financial plan.

ii. Portfolio Management

Advisor provides discretionary and non-discretionary portfolio management services where the investment advice provided is custom-tailored to meet the individualized needs and investment objectives of the client. The portfolios consist primarily of no-load mutual funds such as DFA (Dimensional Fund Advisors) and Vanguard. Advisor's proprietary portfolios are based on a combination of Academic Research, Strategic Asset Allocation, and Asset Class Investing. For more information about Advisor's investment strategies and methods of analysis, please see Item 8. Also, for more information about Advisor's brokerage practices, please see Item 12.

iii. Qualified Plan Services

For business clients, Advisor offers retirement plan consulting services. These services generally include but are not limited to: ERISA 3(21) discretionary fiduciary services, ERISA 3(38) investment management fiduciary services, plan benchmarking of fees, research on investment manager, investment monitoring, participant education services, request for statement of qualification services, and requests for proposal services. Advisor works with the retirement plan's trustee to tailor a program specifically for that plan.

iv. Seminars and Educational Workshops

Advisor conducts seminars and educational workshops that are designed to meet the unique needs of participants and may include presentations on investment management, financial planning, various investment and insurance strategies, college funding, estate and retirement options, pension and planning issues.

C. Tailored Services

As described above, Advisor's services are individualized to each client. Portfolio management clients may impose restrictions on investment in certain securities or types of securities. All restrictions must be presented to Advisor in writing.

D. Wrap Program

Advisor does not sponsor a wrap program.

E. Client Assets Managed

As of December 31st, 2022, Synergy Wealth Management LLC managed approximately $80,632,208. Of this amount, $79,981,923 is managed on a discretionary basis, and $650,285 on a non-discretionary basis.

5. Fees and Compensation

FINANCIAL PLANNING

Advisor's financial planning services are offered on a fixed fee and hourly fee basis.

Advisor charges an hourly fee when a client requests financial planning for an isolated topic. The hourly fee is $250. The fee is negotiable based upon the type of planning selected and the amount of research to be conducted. The hourly financial planning fee is due upon presentation of the written plan.

Advisor charges a fixed fee when a client requests a financial plan on multiple topics. The fixed financial planning fee ranges $500 to $10,000. The fee is negotiable and is based upon the number of topics covered, the amount of time required to write the plan, and the areas of research involved. The fee is due upon presentation of the written plan.

The client can pay for these services by check.

PORTFOLIO MANAGEMENT SERVICES

Fees for portfolio management services will be a percentage of the assets under management. The fee will be calculated, accrued and due at the end of the month (in arrears) and dictated by custodians.

Custodian Reported Value	Annual Fee
$0 to $500,000	1.50%
Next $500,000	1.25%
Next $1,500,000	1.00%
Next $2,000,000	0.75%
Above $5,000,000	Negotiable

The management fee is based on tiered or flat fee basis. A tiered fee means the applicable rate will be applied to the fair market value in each applicable range of account value. For example, an account with a month end value of $700,000.00 will be charged 1.50% on the first $500,000 and 1.25% on the next $200,000. The fee is negotiable. Clients can aggregate multiple accounts to negotiate a lower fee. The fee is based upon the account's previous month-end value as reported by its custodian.

The client will be asked to authorize Advisor to withdraw the fee directly from the client's account.

Clients requesting Advisor's services may pay an initial set up fee of 1% of assets managed by the Advisor or $2,500, whichever is less. The initial set up fee generally covers the cost of an initial portfolio analysis, product research, investment strategy, benchmarking, overall fee analysis, investment turnover analysis, and financial goal analysis. This fee may also cover the written financial plan. This fee is withdrawn when the assets are transferred to the custodian. This fee is negotiable at the Advisor's discretion. The initial set up fee and management fee combined will not exceed 2.00% in a fiscal year.

Advisor's fees are separate and distinct from other fees or expenses that may include brokerage charges, transaction fees, and other related costs and expenses. Additionally, clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by mutual fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, as disclosed in a fund's prospectus, which are separate and distinct from the firm's fee.

QUALIFIED PLAN SERVICES

Advisor's fees for qualified plan services are based on a percentage of assets in the plan. The annual fee schedule is:

Custodian Reported Value	Annual Fee
$0 to $1,000,000	1.00%
Next $1,500,000	.75%
Next $2,500,000	.50%
Next $5,000,000	.40%
Above $10,000,000	Negotiable

The management fee is based on a tiered or flat fee basis. A tiered fee means the applicable rate will be applied to the fair market value in each applicable range of account value. For example, an account with a month end value of $1,300,000.00 will be charged 1.00% on the first $1,000,000 and .75% on the next $300,000.

The fee is collected either monthly or quarterly in arrears based on the period's end value of the plan. The fee is negotiable at the Advisor's discretion. The client will be asked to authorize Advisor to withdraw the fee directly from the plan's assets.

SEMINARS AND EDUCATIONAL WORKSHOPS

Advisor charges from $25 to $100 for its seminars and educational workshops, although often these sessions are hosted at no cost. The fee is due at the beginning of the seminar or educational workshop. The fee charged is for reimbursement of expenses only. Advisor's fee for workshops varies depending upon complexity of content and materials provided. Fees are outlined in the invitation or contract for services. Seminar and Educational Workshop attendees are welcome to engage the Advisor, but are never under any obligation to do so.

Termination of Services

Financial Planning clients may terminate the financial planning service for any reason within the first five (5) business days after signing the contract without any cost or penalty. Thereafter, the contract may be terminated by either the client or the Advisor at any point in time through written notice to the party's respective address of record.

Portfolio management and qualified plan service clients may terminate their service for any reason at any time and, within the first five (5) business days after signing the contract, receive a 100% refund of any fees paid without any cost or penalty. Thereafter, the service may be terminated at any time by giving seven (7) days' written notice. The written notice of termination must be sent to Synergy Wealth Management LLC, 660 Cascade W. Parkway SE, Suite 250, Grand Rapids, MI 49546.

Retirement Rollover Conflicts of Interest

When we recommend you rollover a retirement account for us to manage, this creates a financial incentive because we charge a fee for our services. We attempt to mitigate the conflict of interest by acting in your best interest and applying an impartial conduct standard to all rollovers. Please note that you are not under any obligation to roll over a retirement account to an account managed by us.

6. Performance-Based Fees and Side by Side Management

Advisor does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). It does not perform side-by-side management.

7. Types of Clients

Advisor's services are offered to individuals, high net worth individuals, pension and profit sharing plans, and corporations or other business entities. Advisor does not have a minimum account size. However, Advisor generally likes to see a client reach a mutually agreed upon asset level within a few years. This requirement may be waived at Advisor's discretion.

8. Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis and Investment Strategies

With respect to Advisor's financial planning services, it uses an individualized asset allocation method for each client. When deciding on the asset allocation for a client, Advisor takes into account the client's risk tolerance, goals, investment objectives, and other data gathered during the client meetings. Advisor reverse engineers a portfolio by starting with the client's end goals and investment objectives to create a current portfolio.

Asset Allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance, and investment horizon among various asset classes. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time. Also, despite being diversified there is no guarantee that an account will grow.

Once the client's portfolio is created, the Advisor manages it through a combination of Strategic Asset Allocation and Modern Portfolio Theory. On a weekly basis Advisor reviews portfolios based on global economic & financial analysis, sector analysis, and value analysis. It looks for rebalancing opportunities. Through periodic rebalancing, Advisor attempts to maintain effective diversification to avoid being overly dependent on one fund category that may over-weigh the portfolio's risk. Rebalancing sometimes forces the portfolio to "cut back" on winners and increase the allocation on other undervalued categories.

In addition to Strategic Asset Allocation, Advisor applies the Modern Portfolio Theory, a mathematical approach to asset allocation developed by the 1990 Nobel Laureate Harry Markowitz, to balance the levels of risk and return. This investment technique is a form of diversification where an investment portfolio is allocated among a number of asset classes, countries, and industries in order to help maximize returns while limiting risk exposure. Thus, a global diversification would allow for the same portfolio return with a reduced risk. However, as with every investment strategy, there is risk associated with Modern Portfolio Theory, and despite being diversified there is no guarantee that an account will grow.

B. RECOMMENDED SECURITIES AND INVESTMENT RISKS

Advisor primarily uses open end mutual funds. However, on occasion it may also use other securities including, but not limited to: Equity Securities; Bonds and other corporate debt instruments; Closed End Mutual Funds; Exchange Traded Funds; Government Debt instruments including Treasury Bills and Municipal securities; Certificates of Deposit; Money Market Funds and Cash.

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While Advisor uses investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. A client needs to ask questions about risks he/she does not understand. Advisor would be pleased to discuss them.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. The client's account performance could be hurt by:

- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.

- **Inflation Risk:** This is the risk that inflation will undermine the performance of your investment and/or the future purchasing power of your assets.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Firm, depending on the amount of Client assets invested in bonds.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.
- **Liquidity Risk:** Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing the ability to sell such illiquid securities at an advantageous time or price, or possibly requiring the client to dispose of other investments at unfavorable times or prices in order to satisfy its obligations.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the Client's account to underperform relative to benchmarks or other accounts with a similar investment objective.
- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10 years that would be material to your evaluation of Advisor or the integrity of its management. Advisor and its owner have no information applicable to this Item because they have never been the subject of any administrative, civil, criminal, regulatory (SEC or State) or self-regulatory proceedings.

10. Other Financial Industry Activities and Affiliations

A. Broker-Dealer Affiliations

Advisor and its owners are not affiliated with a broker-dealer.

B. Futures/Commodities Firm Affiliation

Advisor and its owners are not affiliated with a futures or commodities broker.

C. Other Industry Affiliations

Advisor does not have any other industry affiliations.

D. Selection of Third Party Investment Advisers

Advisor does not Select and Monitor Third Party Investment Advisers.

11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Description

Advisor's Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. Advisor will provide a copy of its Code of Ethics to any client or prospective client upon request.

Advisor's Code of Ethics covers all supervised persons and it describes its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Advisor must acknowledge the terms of the Code of Ethics annually, or as amended.

B. Material Interest in Securities

Advisor and the owners do not have a material interest in any securities.

C. Investing in or Recommending the same Securities

Advisor's owners may buy or sell for their own account the same securities that are recommended to clients. As a result of this potential conflict of interest the Advisor's Code of Ethics requires employees to: 1) report personal securities transactions on at least a quarterly basis, and 2) provide the Advisor with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) in which such Employees have a direct or indirect beneficial interest. The records of all associates' proprietary trading activities are reviewed and made available to regulators to review on the premises.

12. Brokerage Practices

A. Recommendation Criteria

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services that include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.) Advisor also recommends Fidelity as the custodian for corporate retirement plans.

NOTE: Clients may be able to obtain lower commissions and fees from other brokers, and the value of products, research and services given to the applicant is not a factor in determining the selection of broker/dealers or the reasonableness of their commissions.

i. Research and Soft Dollars

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. Advisor does not receive "soft dollars" from any vendor, service provider, or custodian.

ii. BROKERAGE FOR CLIENT REFERRALS

Advisor does not receive client referrals or any other incentive from any broker-dealer or custodian.

iii. DIRECTED BROKERAGE

Some clients may direct Advisor to use a specific broker-dealer to execute securities transactions for their accounts. When so directed, Advisor may not be able to effectively achieve best execution on clients' transactions.

B. TRADE AGGREGATION

Advisor may aggregate orders with respect to the same security purchased for different clients. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs, based upon each account's participation in the transaction, subject to our discretion depending on factual or market conditions. Clients participating in block trading may include proprietary or related accounts. These accounts are treated as client accounts and are neither given preferential nor inferior treatment versus other client accounts. Allocations of orders among client accounts must be made in a fair and equitable manner.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Advisor's owner, Mr. Iacovoni, reviews client accounts on a weekly basis. Generally, he meets with clients semi-annually to review their accounts. However, clients may choose to meet more or less frequently at their discretion.

B. OTHER REVIEWS

Reviews may also be triggered by events within clients' lives, as well as pertinent news events, changes in federal and state regulatory or tax regimes, and overall economic events.

C. REPORTS

Financial Planning clients receive a written report at the conclusion of the financial planning engagement. Portfolio Management clients will receive account statements from the custodian of their accounts at least quarterly, although monthly is customary.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

As disclosed under Item 12, above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services, which are provided without cost or at a discount: receipt of duplicate client statements and confirmations; research-related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading, which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts; the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its client accounts. These products or services may assist Advisor in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

B. CLIENT REFERRALS

Advisor does not pay for client referrals or use solicitors.

15. CUSTODY

All client funds, securities and accounts are held at TD Ameritrade or Fidelity. Advisor does not take possession of a client's funds, securities or accounts. However, portfolio management clients will be asked to authorize Advisor with the ability to deduct its fees directly from the client's account. This authorization will apply to Advisor's management fees only. A client may cancel the Advisor's ability to deduct the fees from the Account by notifying Advisor at any time. The Account's custodian will send a quarterly account statement, indicating the amount of fees withdrawn from the client's Account. Advisor urges clients to carefully review their statements and notify the firm of any discrepancies as soon as possible.

Additionally, we assist some clients with the ability to move money from one account to another. IN these situations, the client will sign standing letter of instructions ("SLOA") or similar with their custodian that grants us the ability to facilitate the transfer. When the clients' money is transferred between accounts with different titles, this is considered a limited form of custody. In 2017, the SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody

Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). Advisor and its clients custodian follow the safeguards outlined in the letter. These safeguards include:

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

16. INVESTMENT DISCRETION

Advisor offers both discretionary and non-discretionary investment management services. The discretionary investment management is granted when a client signs an investment management agreement. The investment management agreement contains a limited power of attorney that allows Advisor to select the securities to be bought and sold and the amount of securities to be bought and sold in the client's account. It also allows the firm to place each such trade without the client's prior approval. In all cases, however, this discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account, and any other investment policies, limitation or restrictions.

When a client selects non-discretionary investment management services, the client retains full discretion to supervise, manage, and direct the assets of the account. The client will be free to manage the account with or without Advisor's recommendation and with or without Advisor's prior consultation.

17. VOTING CLIENT SECURITIES

Advisor does not vote proxy. Clients will receive proxy materials directly from their accounts custodian. Any proxy solicitation materials received by Advisor will be forwarded to clients for response and voting. In the event a client has a question about a proxy solicitation, the client should contact his/her investment adviser representative.

18. Financial Information

A. Balance Sheet

Advisor does not require or solicit prepayment of more than $500 in fees per client, six months or more in advance.

B. Financial Condition

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Advisor's financial condition. Advisor has no financial commitment that impairs its ability to service its clients.

C. Bankruptcy

Advisor, its owner and its investment adviser representatives have not been the subject of a bankruptcy proceeding.

19. Requirements for State-Registered Advisers

We have one executive officer Fred Iacovoni, ("Mr. Iacovoni"). Mr. Iacovoni's biographical information is provided in the attached Brochure Supplement Document.

Mr. Iacovoni is required to disclose additional information if he has other business activities. He is a fishing guide for Mitten State Guide Service, LLC in which he owns.

Mr. Iacovoni is also required to disclose additional information if he receives a portion of performance-based fees or has any relationship or arrangement with an issuer of securities. None of these apply to him.

Last, Mr. Iacovoni and Synergy Wealth Management, LLC have **<u>NOT</u>** been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.
2. An award or other being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
   (a) an investment or an investment-related business or activity;
   (b) fraud, false statement(s), or omissions;
   (c) theft, embezzlement, or other wrongful taking of property;
   (d) bribery, forgery, counterfeiting, or extortion; or
   (e) dishonest, unfair, or unethical practices.