

# TOTAL SOLUTIONS ENTERPRISE, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Total Solutions Enterprise, LLC, which does business as Sparta Wealth Partners. If you have any questions about the contents of this brochure, please contact us at (704) 575-1148 or by email at: [bt@spartawp.com](mailto:bt@spartawp.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Total Solutions Enterprise, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Total Solutions Enterprise, LLC's CRD number is: 318036.*

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*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 10/03/2023

## Item 2: Material Changes

We made the following material change since the last brochure amendment dated 3/31/23:

- We added a Brochure Supplement for Nicholas O’Kelly (please see Brochure Supplements below).

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Total Solutions Enterprise, LLC d/b/a Sparta Wealth Partners (hereinafter “Sparta Wealth Partners”) is a Limited Liability Company organized in the State of North Carolina. The firm was formed in January 2020, and the principal owner is Total Solutions Enterprise Holdings, LLC.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

Sparta Wealth Partners offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Sparta Wealth Partners creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to: investment strategy; asset allocation; risk tolerance; personal investment policy; asset selection and regular portfolio monitoring.

Sparta Wealth Partners evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Sparta Wealth Partners will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Sparta Wealth Partners seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its clients and without consideration of Sparta Wealth Partners’ economic, investment or other financial interests. To meet its fiduciary obligations, Sparta Wealth Partners attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Sparta Wealth Partners’ policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Sparta Wealth Partners’ policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

#### ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; insurance; tax concerns; retirement planning; college planning; estate planning; and debt/credit planning.

#### ***Retainer Services***

Some clients may want Sparta Wealth Partners to assist them with ongoing financial planning with a goal toward increased assets. We have a select group of clients that would be ideally served with

our retainer service. This service may be most ideal for young professionals, though we do not limit this service to them. Sparta Wealth Partners offers this comprehensive service to clients that want to focus on financial planning and personal financial preparation. It is charged as an on-going monthly retainer program of an amount negotiated between the client and Sparta Wealth Partners.

#### ***Initial Onboarding Process for Retainer Services***

- Various service levels are offered to provide the most appropriate services for clients based on their needs and goals.
- The Client would complete an Investment Advisory Agreement and schedule an in-depth exploratory discussion to evaluate the Client's current situation and investment goals and objectives.
- Sparta Wealth Partners will provide a personal risk analysis to determine an appropriate investment strategy. This would include a review of any current investment portfolio and current risk tolerance.
- A financial plan will be created, provided and reviewed with the client.
- On-going services will be implemented at this point. The fees for on-going services are detailed in the section below, *Item 5 – Fees and Compensation*.

#### ***Service Levels***

Sparta Wealth Partners' retainer services are offered under ESSENTIAL, PREMIER and SIGNATURE Wealth Planning service levels.

The ESSENTIAL level of service objectives are to initiate a savings and investment strategy, insurance needs, provide debt and student loan management, and financial goals counseling.

The PREMIER level of service objectives are to provide a basic financial plan, focusing on investment strategy, education planning, and organization of the client's financial life.

The SIGNATURE level of service objectives are to provide a comprehensive financial plan, in-depth analysis and recommendations, and advise the client on any financial matters that may arise.

#### ***Held Away Account Asset Management***

We use a third-party platform (Pontera) 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 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.

#### ***Securities Based Line of Credit (SBLOC)***

As an ancillary service, Sparta Wealth Partners, offers certain clients with at least \$100,000 in nonretirement assets, the opportunity to establish a line of credit which is backed by securities in

their portfolio. The Company does not receive direct or indirect compensation for these Securities Based Lines of Credit (SBLOC) but offers this as a means of low cost of capital finance for these affluent clients. There are certain restrictions on what the funds can be used for (e.g., cannot be used to repay a margin loan, variable insurance products or any insurance product issued or brokered through an affiliate of the lender). The interest rate charged for the SBLOCs is on a tiered schedule where the rate drops as the credit limit rises. An additional discount is granted for clients with at least \$5,000,000 in assets under management at the time of inception. In supervising this program, and in keeping with our fiduciary responsibility to our clients, the Company will disclose all relevant details to any client that shows interest in obtaining an SBLOC. Some of the possible risks from using an SBLOC include:

- unintended tax consequences;
- possible need for the client to sell certain holdings which in turn can negatively impact long-term investment goals;
- market conditions can magnify any potential for loss if the market turns against the client, they may be required to quickly deposit additional securities and/or cash in the account(s) or pay down the loan to avoid liquidation.
- The securities in the pledged account(s) may be sold to meet the collateral call, and the firm may sell the client's securities without contacting them.
- A client may not be entitled to choose which securities or other assets in his or her account are liquidated or sold to meet a collateral call.
- In many cases, the firm may increase its maintenance requirements at any time and is not required to provide a client advance written notice.
- A client may not be entitled to an extension of time on a collateral call. Increased market interest rates could also affect the applicable rate index that applies to your line of credit, causing the cost of the credit line to increase significantly.

The Company actively addresses the risks above by educating the relevant client base on these factors and monitoring SBLOC balances, which are typically paid down in short order and routinely retired.

### ***Services Limited to Specific Types of Investments***

Sparta Wealth Partners generally limits its investment advice to mutual funds, fixed income securities, equities and ETFs. Sparta Wealth Partners may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

Sparta Wealth Partners offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Sparta Wealth Partners from properly servicing the client account, or if the restrictions would require Sparta Wealth Partners to deviate from its standard suite of services, Sparta Wealth Partners reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Sparta Wealth Partners does not participate in any wrap fee programs.

### **E. Assets Under Management**

Sparta Wealth Partners has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$194,100,000	\$0	March 30, 2023

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

Sparta Wealth Partners' advisory fees are negotiable, and do not exceed 2.00%. Fees are charged monthly in advance or arrears. The final fee schedule will be memorialized in the client's advisory agreement and custodial agreements. Sparta Wealth Partners uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. Consulting services are included in these fees for asset management services with the exception of unique circumstances that may require a separate agreement for financial planning services (description and fees are discussed below). If the situation warrants separate financial planning fees, it will be discussed upfront and a separate agreement will be negotiated.

Clients may terminate the agreement without penalty for a full refund of Sparta Wealth Partners' fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice. Clients who terminate investment advisory services during a month, are charged a prorated advisory fee based on the date of Sparta Wealth Partners' receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable, and any prepaid and unearned fees will be immediately refunded.

#### Long/Short Strategy

For clients that elect a Long/Short strategy with a sub-advisor, a 1.00% annual asset-based and a 10% performance-based "incentive" fee will be charged. The annual asset-based fee is payable monthly in advance or in arrears, in accordance with the client's agreement, and is based on the value of the client's account at the end of the prior month, with performance-based fee being assessed quarterly in arrears. If management begins after the start of a month, fees will be prorated accordingly. With client authorization, fees are normally debited directly from client accounts.

Held Away participant 401K accounts may be charged a lower fee depending on the scope and complexity of the plan options.

#### Performance Fee Calculation Methodology

Sparta Wealth Partners gives certain clients the option of being charged performance-based fees. Due to strict regulatory requirements, performance-based fees can only be charged to "qualified clients". A qualified client is defined as a client that has over \$1.1 million invested with us, OR a net worth of at least \$2.2 million, excluding primary residence. Performance-based fees may not be charged to any client that does not meet the definition of a qualified client. For accounts that are charged performance-based fees, the performance-based fee component of the investment management fee is calculated as of December 31 of each year. When "Net Profits" are earned for the current period, Sparta Wealth Partners and the sub-advisor will internally share the performance fee of 10% of the Net Profits generated, subject to a "High Water Mark." No

performance fee is assessed in any performance measurement period if the Net Profits for the performance measurement period are zero or negative.

Net Profits for any calculation period equal the current period ending value of net assets (including unrealized gains and losses, accrued dividends, accrued interest and net of asset-based fees), less the current High-Water Mark.

The High-Water Mark for an account for any calculation period is the highest ending value of net assets of an account for which a performance fee was previously paid by the account. The High-Water Mark will be increased for any deposits added to an account during a calculation period.

If a client withdraws capital from its account before the end of an annual performance period, the performance fee for the amount withdrawn will be calculated based on the Net Profits for the year as of the withdrawal date and based on the High-Water Mark.

Performance-based compensation may create an incentive for our firm to recommend investments that may carry higher degrees of risk to the client. Sparta Wealth Partners has a fiduciary responsibility to our clients, and we will only make recommendations that meet our clients' investment objectives and goals.

### ***Financial Planning Fees***

Financial planning services are charged in advance or arrears through a fixed fee or hourly arrangement as agreed upon between the client and Sparta Wealth Partners. There will never be an instance where \$1,200 or more in fees is charged six or more months in advance. Similar financial planning services may be available elsewhere for a lower cost to the client.

### **Fixed Fees**

Fixed fees are generally quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. The negotiated fixed rate for creating client financial plans is between a minimum annual fee of \$1,200 and maximum of \$30,000. An estimate for total hours and charges is determined at the start of the advisory relationship.

### **Hourly Fees**

Hourly fees are generally charged when the scope of services cannot be determined or if the services are limited to one meeting. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. The negotiated hourly fee for these services is between \$250 and \$500.

### ***Retainer Services***

Retainer services are available to clients that wish to have ongoing financial planning and consulting. Retainer services include coordinating, advising and consulting on all financial matters, and



introducing clients to outside professionals whose areas of expertise are outside Sparta Wealth Partners' professional expertise. Services may include financial advising on expected life changes, personal budgeting, estate planning, and insurance assessment. In addition, retainer services may include creating budgets and planning for saving and retirement contributions. The retainer services provide clients with a "go to" person on any financial matter that arises. Retainer fees are billed monthly and in advance or arrears. The fee is negotiable and can be renegotiated on an annual basis.

## **Service Level Fees**

As noted in Item 4 above, Sparta Wealth Partners' services are offered ESSENTIAL, PREMIER and SIGNATURE Wealth Planning service levels. The retainer fee includes an on-board and initial plan fee as well as the ongoing monthly fee charged in advance or arrears. Clients are provided a fee invoice which is payable upon receipt. Should the Agreement be terminated, the retainer fee will not be prorated for any remaining days in the month.

ESSENTIAL Level - Clients engaging Sparta Wealth Partners at the ESSENTIAL level will pay a maximum ongoing monthly fee of \$250.00.

PREMIER Level - Clients engaging Sparta Wealth Partners at the PREMIER level will pay a maximum ongoing monthly fee of \$600.00.

SIGNATURE Level - Clients engaging Sparta Wealth Partners at the SIGNATURE level will pay a maximum ongoing monthly fee of \$2,500.00.

Clients may terminate the agreement without penalty, for full refund of Sparta Wealth Partners' fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Upon receipt of written notification, any earned fee will immediately become due and payable, and any prepaid and unearned fees will be immediately refunded.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in accordance with the client's agreement with Sparta, which may be in advance or in arrears.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check, ACH or credit card.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

Hourly financial planning fees are paid 100% in advance, but never more than six months in advance.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, lending fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Sparta Wealth Partners. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

Sparta Wealth Partners collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

With certain outside business activities (see Item 10 below), representatives of Sparta Wealth Partners, including but not limited to David Blair Thompson, are licensed to accept compensation for the sale of investment products to Sparta Wealth Partners clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receive compensation, Sparta Wealth Partners will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with Sparta Wealth Partners.

Commissions are not Sparta Wealth Partners primary source of compensation. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

As noted above, Sparta Wealth Partners offers to manage Long/Short Strategy portfolios pursuant to an asset-based investment management fee and performance-based investment management fee arrangement. The client compensates Sparta Wealth Partners for its services, in addition to an asset-based investment management fee based on the market value of the client's assets, by paying Sparta Wealth Partners a percentage of the Net Profits of the client's investment in the strategy. Sparta

Wealth Partners charges these performance-based fees on Net Profits each year, however, if a portfolio subject to such a fee arrangement has no Net Profits in a particular year, no performance fee will be charged until prior losses have been recouped (see discussion of “High Water Mark” in Item 5 Fees and Compensation above).

Performance-based fees are calculated and assessed in arrears, and the client should carefully review the performance fee calculations described in Item 5 Fees and Compensation above for accuracy.

Clients should be aware that when Sparta Wealth Partners receives a performance-based fee, which is a financial incentive to achieve gains in excess of the disincentive to suffer losses, Sparta Wealth Partners and/or sub advisors may have an incentive to choose investments that are riskier or more speculative than might otherwise be chosen. Sparta Wealth Partners has a fiduciary responsibility to our clients, and we will only make recommendations that meet our clients’ investment objectives and goals.

## Item 7: Types of Clients

Sparta Wealth Partners generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit-Sharing Plans
- ❖ Corporations or Business Entities

There is no account minimum for any of Sparta Wealth Partners’ services.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

Sparta Wealth Partners’ methods of analysis include Fundamental analysis and Technical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

#### *Investment Strategies*

Sparta Wealth Partners uses long-term trading and short-term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### *Investment Strategies*

**Long-term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short-term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the

payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked.

With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable).

Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks.

The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Alternative Investments:** Alternative Investments are unregistered private investment partnerships, funds or pools that may invest and trade in many different market strategies, and instruments

(including securities, non-securities and derivatives) and that employ different investment, hedging, leverage and arbitrage methodologies. Alternative Investments are not subject to the same regulatory requirements as mutual funds, including requirements to provide certain periodic and standardized pricing and valuation information to investors. Alternative Investment documents are not reviewed or approved by federal or state regulators. Alternative Investments are not required to provide periodic pricing or valuation information to investors and it may be their practice to not provide such information.

An Alternative Investment may have limited liquidity or may be illiquid and there may be significant restrictions on transferring interests. Moreover, there is no secondary market for an investor's investment in an Alternative Investment and none is expected to develop.

An Alternative Investment's fees and expenses, which may be substantial regardless of any positive return, will offset the investment's trading profits.

Alternative Investments may have little or no operating history or performance and may use hypothetical or pro forma performance which may not reflect actual trading done by the manager or advisor and such history or performance should be reviewed carefully.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Certain representatives of Sparta Wealth Partners are also registered representatives of Coastal Equities, Inc., located in Wilmington, DE, as indicated in Part 2B of this disclosure.

## **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Sparta Wealth Partners nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

## **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

David Blair Thompson and Nicholas O'Kelly are both independent licensed insurance agents, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Sparta Wealth Partners always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Sparta Wealth Partners in connection with such individual's activities outside of Sparta Wealth Partners.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

Sparta Wealth Partners may recommend third-party asset managers from whom we will receive a portion of the advisory fees charges to you by the third-party manager. This is a conflict of interest which we manage by selecting only third-party managers that provide services advantageous to our clients based on cost, management styles, past history, ability to meet client needs, and unique services not otherwise available to our clients. The portion of the fee that we receive is based on the size and growth of your account, so our interests are aligned with yours to work to achieve your performance objectives.

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

## **A. Code of Ethics**

Sparta Wealth Partners has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Sparta Wealth Partners' Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

Sparta Wealth Partners does not recommend that clients buy or sell any security in which a related person to Sparta Wealth Partners or Sparta Wealth Partners has a material financial interest.

## **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of Sparta Wealth Partners may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Sparta Wealth Partners to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Sparta Wealth Partners will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of Sparta Wealth Partners may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Sparta Wealth Partners to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Sparta Wealth Partners will never engage in trading that operates to the client's disadvantage if representatives of Sparta Wealth Partners buy or sell securities at or around the same time as clients.

# **Item 12: Brokerage Practices**

## **A. Factors Used to Select Custodians and/or Broker-Dealers**

Custodians/broker-dealers will be recommended based on Sparta Wealth Partners' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Sparta Wealth Partners may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Sparta Wealth Partners' research efforts. Sparta Wealth Partners will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Sparta Wealth Partners typically recommends Schwab Institutional, a division of Charles Schwab & Co., Inc, Interactive Brokers and IRA Club.



While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including, but not limited to research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

Sparta Wealth Partners does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Sparta Wealth Partners does not have any formal soft dollar arrangements.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If Sparta Wealth Partners buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Sparta Wealth Partners would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Sparta Wealth Partners would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

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

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Account reviews are performed annually or at the request of the client by the Investment Adviser Representative assigned to the account. They monitor the performance of each investment based on how similar investments have performed and make changes when necessary. The portfolio manager determines the investment strategies and parameters for each account. Account reviews are performed more frequently when market conditions dictate.

While reviews and updates to the financial plan are not part of the contracted services, at your request we will review your financial plan to determine if the investment advice provided is consistent with your investment needs and objectives. We will also update the financial plan at your request. At our sole discretion, reviews and updates may be subject to our current hourly rate. For those clients to whom Sparta Wealth Partners provides ongoing financial advisory services, reviews are conducted on an as needed or agreed upon basis. Clients receiving the PREMIER level of service will receive an audit if their plan of record is greater than twelve (12) months old. Clients receiving SIGNATURE service level will receive an audit of their financial plan on an annual schedule. Such reviews are conducted by one of Sparta Wealth Partners investment adviser representatives or principals.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Sparta Wealth Partners' services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of Sparta Wealth Partners' advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Other than soft dollar benefits as described in Item 12 above, Sparta Wealth Partners does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Sparta Wealth Partners clients.

With respect to Schwab, Sparta Wealth Partners receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Sparta Wealth Partners client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Sparta Wealth Partners other products and services that benefit Sparta Wealth Partners but may not benefit its clients' accounts. These benefits may include national, regional or Sparta Wealth Partners specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Sparta Wealth Partners by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Sparta 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, if applicable), provide research, pricing information and other market data, facilitate payment of Sparta Wealth Partners' fees from its clients' accounts (if applicable), 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 Sparta Wealth Partners' accounts. Schwab Advisor Services also makes available to Sparta Wealth Partners other services intended to help Sparta Wealth Partners manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Sparta Wealth Partners by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Sparta Wealth Partners. Sparta

Wealth Partners is independently owned and operated and not affiliated with Schwab.

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

Sparta Wealth Partners does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

Sparta Wealth Partners does not take custody of client's funds. When advisory fees are deducted directly from client accounts at client's custodian, Sparta Wealth Partners must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

Sparta Wealth Partners provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Sparta Wealth Partners generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

### **Item 17: Voting Client Securities (Proxy Voting)**

Sparta Wealth Partners will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

Sparta Wealth Partners neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

#### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Sparta Wealth Partners nor its management has any financial condition that is likely to reasonably impair Sparta Wealth Partners' ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Sparta Wealth Partners has not been the subject of a bankruptcy petition in the last ten years.

## Brochure Supplement: David Blair Thompson

Form ADV, Part 2B Brochure Supplement

### David Blair Thompson, President & Partner Advisor

Total Solutions Enterprise, LLC (d/b/a Sparta Wealth Partners)  
7401 Carmel Executive Park Drive, Suite 106  
Charlotte, NC 28226  
704-575-1148

October 03, 2023

**This brochure supplement provides information about David (“Blair”) Thompson that supplements the Sparta Wealth Partners brochure. You should have received a copy of that brochure. Please contact him at (704) 575-1148 if you did not receive the Sparta Wealth Partners brochure or if you have questions or comments about this supplement.**

Additional information about Mr. Thompson also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Item 2 – Education Background and Business Experience

Mr. Thompson serves as Founder and President of Sparta Wealth Partners. Employing his strategic background, Mr. Thompson has assembled a wealth of business and financial resource specialists to meet the full spectrum of client needs all in one place. As both an adviser and leader of Sparta, helping others be successful is truly Mr. Thompson's passion.

Formerly a Senior Vice President and HNW Relationship Manager with private banks, Mr. Thompson delivered a full suite of private banking, investment management, wealth planning, trust, insurance and estate services to high net worth individuals and companies across the country. Prior to the private banking roles, Mr. Thompson owned and operated his own firm, Thompson Financial Partners, that evolved from a career adviser to a fully independent model in the late 2000’s prior to being rolled into the bank channel. This experience serves as a tremendous basis for helping successful business owners evaluate what banking products, offerings and services best meet their needs from an agnostic advocate or personal CFO type lens.

Mr. Thompson holds a bachelor’s degree in Economics and Spanish from the University of North Carolina at Chapel Hill. He has also served on the boards of the Society of Financial Services Professionals, National Association of Insurance and Financial Advisers, Special Operator Transition Foundation, The Rosie Network and the SEAL Naval Special Warfare Family Foundation. While Mr. Thompson is a civilian, he has also served on a National Innovation Council with the Department of Defense and is a uniquely positioned strategic adviser to companies in the US Special Operations Command Network. Mr. Thompson was also appointed as the Private Capital Adviser for NavalX, a government organization focused on connecting the US Navy with private sector companies, entrepreneurs and disruptive technology. Mr. Thompson maintains his Series 7, 63, and 65 registrations along with life, health, disability and long-term care insurance licenses.

### **Item 3 - Disciplinary Information**

Mr. Thompson has not been the subject of any legal or disciplinary event requiring disclosure under the laws or regulations governing disclosure to investment advisory clients.

### **Item 4 - Other Business Activities**

Mr. Thompson is a registered representative of Coastal Equities, Inc. He is also a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products may conflict with the fiduciary duties of a Registered Investment Adviser. Sparta Wealth Partners acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any Sparta Wealth Partners representative in such individual's outside capacities. He spends approximately 5 hours a month on each activity.

Additional information about Mr. Thompson can be found at [brokercheck.finra.org](http://brokercheck.finra.org).

### **Item 5 - Additional Compensation**

Mr. Thompson does not receive any economic benefit from any person, company, or organization other than Sparta Wealth Partners in exchange for providing clients advisory services. However, Mr. Thompson receives additional compensation from his brokerage and insurance commission business, as well as from consulting fees and other revenue generated by Backstage Pass LLC, Sine Pari LLC or DBT Consulting LLC.

### **Item 6 - Supervision**

As Sparta Wealth Partners' Chief Compliance Officer, Mr. Thompson supervises all activities of the firm. His contact information is on the cover page of this disclosure document. Mr. Thompson adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

## Brochure Supplement: Andrew Burquest

Form ADV, Part 2B Brochure Supplement

### **Andrew B. Burquest, Advisor**

Total Solutions Enterprise, LLC (d/b/a Sparta Wealth Partners)  
7401 Carmel Executive Park Drive, Suite 106  
Charlotte, NC 28226  
704-309-2052

October 03, 2023

**This brochure supplement provides information about Andrew Burquest that supplements the Sparta Wealth Partners brochure. You should have received a copy of that brochure. Please contact Blair Thompson at (704) 575-1148 if you did not receive the Sparta Wealth Partners brochure or if you have questions or comments about this supplement.**

**Additional information about Mr. Burquest also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Education Background and Business Experience**

Mr. Burquest serves as an advisor of Sparta Wealth Partners. Formerly a National Account Manager with TIAA, Mr. Burquest worked with large and boutique institutional investment managers across retirement plan, managed account, brokerage, and 529 plan businesses. He experienced customized investments solutions tailored to the requirements of sophisticated institutional clients and observed the inadequacy of investment opportunities offered to successful individuals. Prior to his institutional role, Mr. Burquest began his financial services career in private client advisory with Defender Capital. He developed comprehensive client-centric advisory experience and broad exposure to conventional equity and fixed income, as well as targeted private equity, alternative, and esoteric investment vehicles.

Mr. Burquest holds a bachelor's degree in Finance from Virginia Tech and an MBA from the University of North Carolina at Charlotte. He has been a CFA® Charter holder since 2013 and maintains FINRA Series 7 and 66 licenses.

### **Item 3 - Disciplinary Information**

Mr. Burquest has not been the subject of any legal or disciplinary event requiring disclosure under the laws or regulations governing disclosure to investment advisory clients.

### **Item 4 - Other Business Activities**

Mr. Burquest is a registered representative of Coastal Equities, Inc. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products



may conflict with the fiduciary duties of a Registered Investment Adviser. Sparta Wealth Partners acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any Sparta Wealth Partners representative in such individual's outside capacities. He spends approximately 5 hours a month on this activity.

Mr. Burquest is a commissioned Officer in the North Carolina Army National Guard. In this role, Andrew holds the rank of Major and serves in duty positions aligned with his military branch as an Engineer Officer. He spends approximately 20 hours a month, primarily on weekends, on this activity.

Mr. Burquest is a court appointed General Guardian. In this role, Andrew manages the personal and financial matters of an individual and their estate to provide for the best interests of the ward. He spends approximately 8 hours a month on this activity.

Mr. Burquest is the founder and owner of Njord Capital, LLC. In this role, Andrew works with other firms and advisors on a consulting basis, assisting with Trusts, banking, mergers and acquisitions, business valuation, and estate planning. He spends approximately 5 hours a month on this activity.

Additional information about Mr. Burquest can be found a [brokercheck.finra.org](http://brokercheck.finra.org).

#### **Item 5 - Additional Compensation**

Mr. Burquest does not receive any economic benefit from any person, company, or organization, other than from Sparta Wealth Partners in exchange for providing clients advisory services. Andrew does, however, receive additional compensation from his brokerage business, military service, court appointed General Guardian duties, as well as from consulting fees and other revenue generated by Njord Capital, LLC.

#### **Item 6 - Supervision**

Mr. Burquest reports directly to and is supervised by Blair Thompson. Mr. Thompson periodically reviews all accounts serviced by Mr. Burquest and regularly communicates with Mr. Burquest regarding the status of client accounts. Any client with questions or concerns regarding the supervision of Mr. Burquest is asked to contact Mr. Thompson directly at (704) 575-1148.

## Brochure Supplement: Lori Copeland

Form ADV, Part 2B Brochure Supplement

### **Lori Copeland, Senior Adviser and Director of Operations**

Total Solutions Enterprise, LLC (d/b/a Sparta Wealth Partners)  
7401 Carmel Executive Park Drive, Suite 106  
Charlotte, NC 28226  
704-957-2287

October 03, 2023

**This brochure supplement provides information about Lori Copeland that supplements the Sparta Wealth Partners brochure. You should have received a copy of that brochure. Please contact Blair Thompson at (704) 575-1148 if you did not receive the Sparta Wealth Partners brochure or if you have questions or comments about this supplement.**

Additional information about Ms. Copeland also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 2 - Education Background and Business Experience**

Ms. Copeland became a Senior Adviser and Director of Operations of Sparta Wealth Partners in January 2023. Prior to joining Sparta Wealth Partners, she was an Investment Advisor Representative of Independent Advisor Alliance, LLC and a Registered Representative of LPL Financial, positions she had held since 2021. She was the Director of Marketing of SilverRock Wealth Partners from 2017 to 2021.

Ms. Copeland earned a Bachelor of Science, Finance from the University of South Carolina, South Carolina Honors College.

### **Item 3 - Disciplinary Information**

Ms. Copeland has not been the subject of any legal or disciplinary event requiring disclosure under the laws or regulations governing disclosure to investment advisory clients.

### **Item 4 - Other Business Activities**

Ms. Copeland is not currently involved with any other business activities.

### **Item 5 - Additional Compensation**

Ms. Copeland does not receive any compensation other than she receives for performing services for Sparta Wealth Partners, as disclosed in the firm's various disclosures.

**Item 6 - Supervision**

Ms. Copeland reports directly to and is supervised by Blair Thompson. Mr. Thompson periodically reviews all accounts serviced by Ms. Copeland and regularly communicates with Ms. Copeland regarding the status of client accounts. Any client with questions or concerns regarding the supervision of Ms. Copeland is asked to contact Mr. Thompson directly at (704) 575-1148.

## Brochure Supplement: Nicholas O'Kelly

Form ADV, Part 2B Brochure Supplement

**Nicholas O'Kelly, Head of Financial Planning & Advisor**

Total Solutions Enterprise, LLC (d/b/a Sparta Wealth Partners)  
7401 Carmel Executive Park Drive, Suite 106  
Charlotte, NC 28226  
704-575-1148

October 03, 2023

**This brochure supplement provides information about Nicholas O'Kelly that supplements the Sparta Wealth Partners brochure. You should have received a copy of that brochure. Please contact Blair Thompson at (704) 575-1148 if you did not receive the Sparta Wealth Partners brochure or if you have questions or comments about this supplement.**

**Additional information about Mr. O'Kelly also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Education Background and Business Experience**

Mr. O'Kelly serves as Head of Financial Planning and Advisor for Sparta Wealth Partners. He has a passion for working with others and helping them achieve their financial goals. Integrity, respect, communication, and transparency are characteristics that he emulates in every client-advisor relationship. He treats his clients as part of his extended family, as he has an intimate and vested interest in their future well-being. Nick is a teacher first and will always take the time to ensure his clients understand the financial plan and recommendations.

Mr. O'Kelly retired from the Army as a Chief Warrant Officer 3. He initially entered the Army with a Special Forces enlisted contract and served as a Green Beret in 1st Special Forces Group (Airborne). He went on to attend flight school and became a Warrant Officer. After a short time flying in the regular Army, he assessed and was selected to become a Special Operations Blackhawk Pilot in the 160th Special Operations Aviation Regiment (Airborne). He has multiple combat deployments and several non-combat deployments worldwide. His experience in the Special Operations community taught him invaluable lessons in teamwork, problem-solving, and leadership. He has been surrounded by top-tier individuals and operates in fast-paced and demanding situations.

Nick is a CERTIFIED FINANCIAL PLANNER™ professional, a Retirement Income Certified Professional®, and maintains his Series 7, Series 63 and Series 65 registrations along with life, health, disability, and long-term care insurance licenses.

## **Retirement Income Certified Professional®**

The Retirement Income Certified Professional® (RICP®) program empowers financial professionals with the knowledge they need to become experts in today's fast-growing retirement planning market. It is an extensive and intensive retirement income education that covers all retirement income styles and strategies, straight from the nation's top thought leaders.

The accredited RICP® program is tailored for financial professionals seeking to specialize in the retirement income planning field through an online, self-study format that allows you to move through lessons at your own pace to suit your busy schedule.

With the RICP® program, you will gain the skills to build sustainable, holistic retirement plans, delivering unbeatable value for your clients and becoming a sought-after counselor with valuable, and valued, expertise.

Upon completion, you will be a certified financial advisor with a robust toolkit to serve your clients. These tools include estate planning techniques, portfolio assessment, personal finance best practices, health expense budget creation, home equity strategies, and more.

## **CERTIFIED FINANCIAL PLANNER™ professional**

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.CFP.net](http://www.CFP.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### **Item 3 – Disciplinary Information**

Mr. O’Kelly has not been the subject of any legal or disciplinary event requiring disclosure under the laws or regulations governing disclosure to investment advisory clients.

### **Item 4 – Other Business Activities**

Mr. O’Kelly is a registered representative of Coastal Equities, Inc. he is also a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products may conflict with the fiduciary duties of a Registered Investment Adviser. Sparta Wealth Partners acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to utilize the services of any Sparta Wealth Partners representative in such individuals outside capacities. He spends approximately 10 hours a month on each activity.

### **Item 5 – Additional Compensation**

Mr. O’Kelly does not receive any compensation other than he receives for performing services for Sparta Wealth Partners, as disclosed in the firm’s various disclosures. However, Mr. O’Kelly receives additional compensation from his brokerage and insurance commission business.

**Item 6 - Supervision**

Mr. O'Kelly reports directly to and is supervised by Blair Thompson. Mr. Thompson periodically reviews all accounts serviced by Mr. O'Kelly and regularly communicates with Mr. O'Kelly regarding the status of client accounts. Any client with questions or concerns regarding the supervision of Mr. O'Kelly is asked to contact Mr. Thompson directly at (704) 575-1148.