CASTLE WEALTH MANAGEMENT

FORTIFY YOUR FAMILY'S FUTURE

FORM ADV PART 2

October 7, 2026

Contact Information

MAIN OFFICE LOCATION

1880 N Congress Ave, Suite 302

Boynton Beach, FL 33426

(561) 686-9604

www.castlewm.com

ADDITIONAL OFFICE LOCATION

15 East 5th Street

Jamestown, New York 14701

This brochure provides information about the qualifications and business practices of Castle Wealth Management. If you have any questions about the contents of this brochure, please contact us at the number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Castle Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov (CRD# 118364). The SEC's web site also provides information about any persons affiliated with Castle Wealth Management who are registered, or are required to be registered, as investment advisor representatives of Castle Wealth Management.

Castle Wealth Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 - Material Changes

The Material Changes section of this brochure will be updated annually or when material changes have occurred since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures no later than 120 days after our fiscal year end (12/31). We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (561) 686-9604.

Material Changes since the Last Annual Update

Since the last annual filing in March 30, 2026, we have had no material changes to report. However, we have made the following changes:

- Item 7 - Disclosures of the firm's current new client minimum requirements.
- Part 2B - Removal of Lori Fernicola, Nicholas Darzentas and Amber Dakar.

Additionally, we have made other changes, some of which may clarify or enhance existing disclosures, but we do not consider these other changes to be material.

Item 3 - Table of Contents

Item 1 — Cover Page 1

Item 2 — Material Changes 2

Item 3 — Table of Contents 3

Item 4 — Advisory Business 4

Item 5 — Fees and Compensation 7

Item 6 — Performance-Based Fees and Side-By-Side Management 11

Item 7 — Types of Clients 11

Item 8 — Methods of Analysis, Investment Strategies and Risk of Loss 11

Item 9 — Disciplinary Information 16

Item 10 — Other Financial Industry Activities and Affiliations 16

Item 11 — Code of Ethics 17

Item 12 — Brokerage Practices 18

Item 13 — Review of Accounts 22

Item 14 — Client Referrals and Other Compensation 23

Item 15 — Custody 24

Item 16 — Investment Discretion 24

Item 17 — Voting Client Securities 25

Item 18 — Financial Information 26

Brochure Supplement(s)- The Team… 27

Item 4 - Advisory Business

Background Information

Castle Wealth Management provides customized wealth management and financial planning services to high-net-worth families, individuals, businesses, trusts, and charitable entities. Our firm was incorporated on October 9, 1997, as P.F.S. Advisors, L.C. D/B/A Castle Wealth Management, being the successor firm of Worley and Worley, a Florida Registered Investment Advisory firm. At the end of 2018, our legal name was changed from P.F.S. Advisors, L.C. to Castle Wealth Management, LLC (herein after Castle). Castle is primarily owned and overseen by its Managing Member and Founder, Christina Worley CPA/PFS, CFP®, CFA®. Gary Sellari and Melissa Gannon are minority owners. For the complete ownership details please see Form ADV Part 1 Schedule A Direct Owners and Executive Officers at adviserinfo.sec.gov.

Assets Under Management

Our assets under management on a discretionary basis as of 12/31/2025 were $424,800,435 and $5,263,754 on a non-discretionary basis.

Our transactional flexibility provides product diversity, as well as offering third-party Separate Account Managers (SAMs) that we monitor before approving. Here's what you can expect from us:

How We Seek to Earn Your Trust

Our continued success is a direct result of the relationships we build with our clients. We are devoted to helping our clients achieve financial success. We reinforce our commitment by providing personalized service, coupled with current financial knowledge to address your individual needs and circumstances. Furthermore, it is our policy to respond to all client correspondence in a prompt manner. Our team places a premium on client interaction. Our clients rely on us for all their investment needs, large or small, business, or personal.

Our Process

Castle provides Investment Supervisory Services, defined as giving continuous advice to a client or making investments on behalf of individual needs. Through careful discussion of goals and objectives based on client's needs, Castle develops a financial plan unique to each individual who wishes one. Once a specialized Investment Policy Statement (IPS) is established, a portfolio is then generated to reflect the mutually agreed upon asset allocation contained in the IPS.

Each account managed by Castle is on a discretionary and/or non-discretionary basis as outlined in each household's IPS. Account supervision and monitoring is guided by the stated objectives contained in the IPS.

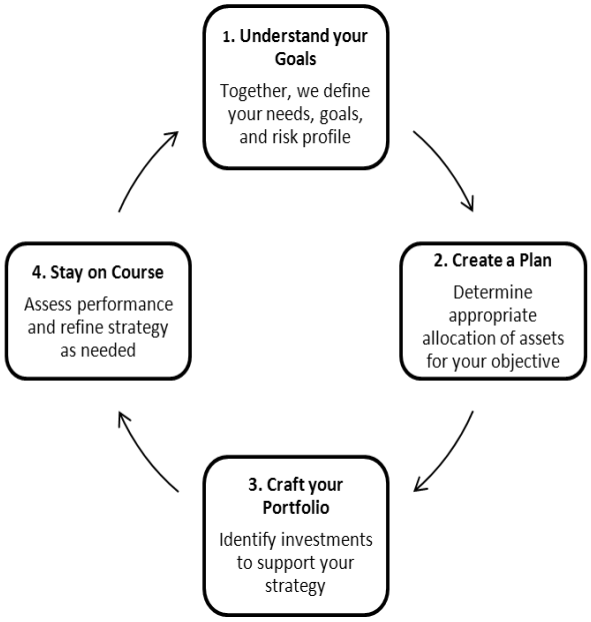
Portfolios managed by Castle may consist of one or all the following: individual equities, bonds, variable annuities, mutual funds, exchange-traded funds (ETFs), CDs, alternative investments, REITs, and accounts managed by third-party Separate Account Managers with specific or specialized strategies. Variable annuities and mutual funds will be selected based on any or all of the following: the fund's performance history, the industry sector, the track record of the fund manager, investment objectives and the overall management philosophy and fee structure.

Portfolio weighting between funds and market sectors will be determined by each client's IPS. Depending upon the risk tolerance and needs of the client, Castle may recommend the use of options (i.e., covered calls or protective puts). Clients will have the opportunity to place reasonable investment restrictions at any time based on risk

tolerance. Clients may impose restrictions on investing in certain securities or types of securities (such as product type, specific companies, specific sectors, etc.). Individual ownership of assets always remains with the client, with brokerage accounts normally custodied at Schwab, and Brighter Future Advisor Plan (529-plans). We will use Equity Institutional, Millennium Trust and Vantage Retirement Plans as custodians for non-standard IRA assets.

Castle seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Castle's economic, investment, or other financial interests. We shall attempt to avoid, among other things, investment trading practices that systematically advantage or disadvantage certain client portfolios. We shall seek fair and equitable allocation of investment opportunities/transactions among our clients to avoid favoring one over another over time.

In the process below, each client is led on a path towards helping them seek long-term financial success:



The personalized attention each client receives combined with a strong client-advisor relationship is what helps build the foundation to our success. Our goal with each client is to meet their long-term financial objectives through a multi-disciplinary approach. With principles of safety and soundness at the heart of every client relationship, Castle is able to continue leading its clients to a path of long-term financial success.

What's Right for You?

Once the financial review is complete and a financial plan agreed upon, we will work diligently to design an individualized asset allocation.

Our planning considers all client holdings, even those we may not manage directly. Our transactional flexibility provides product diversity, as well as offering Third-Party Separate Account Managers (SAMs) that we monitor before approving. Here's what you can expect from us:

- Financial Planning, for as many specific goals as the client has, i.e., retirement, education, etc.
- Disciplined Portfolio Management
- Multigenerational Wealth Transfers
- Retirement & Estate Planning
- Insurance Reviews
- Asset Protection Planning
- Education Planning

Your Personalized Plan

For each client, Castle will produce a written individual IPS reflecting an agreed-upon asset allocation. Once the agreement is signed, we start investing on your behalf as appropriate to seek to meet your objectives. We meet with you to provide a forum to discuss life changes that may influence your financial plan, and to determine if any financial changes or adjustments are necessary. We will also contact you to discuss the impact of current economic conditions on your portfolio. Ongoing portfolio reviews are conducted by our Account Review Committee (ARC). Adjustments may be made quarterly or more often to ensure adherence to your asset allocation. We do not charge any additional fees for providing a financial plan to clients with more than $500,000 in assets under management that are investment advisory clients.

Our Mission

We strive to help you achieve success by providing personalized attention and a commitment to service that addresses not only today's needs but tomorrow's plans. Our dedication to helping you achieve your financial goals means we place a premium on timeliness, thoroughness, and accuracy.

Our Goal

We provide personalized service, coupled with current financial knowledge, to address your individual needs and circumstances. We guide you on a successful path toward meeting your financial goals by utilizing our well documented plans, which are designed to focus on the big picture, not short-term market variations. Why Clients Choose Us:

- Objective Advice
- Investment Diversity
- Transparent Reporting (performance, fees)
- Tax Efficient Portfolio Management
- Multi-disciplined Team

Asset Management

We shall comply with the CFA® Institute's Asset Manager Code. The Asset Manager Code (the Code) outlines the ethical and professional responsibilities of firms that manage assets on behalf of clients. The principles and provisions address six broad categories: (1) loyalty to clients, (2) investment process and actions, (3) trading, (4) risk management, compliance, and support, (5) performance reporting and valuation, and (6) disclosures.

Financial Planning

We have a potential inherent conflict of interest whenever we provide Financial Planning services to a client that has also retained our Investment Advisory services. It could be in our best interest not to recommend paying down debt

that would directly reduce the Assets Under Management that we manage and charge a percentage fee for. We mitigate this conflict by providing an overall plan suitable and in the best interest of the client.

Whenever we provide Financial Planning Services we shall adhere to the Code of Ethics and Standards of Conduct issued by the CFP Board. CFP Board's *Code of Ethics and Standards of Conduct* reflects the commitment that all CFP® professionals make to high standards of competency and ethics. CFP Board's *Code and Standards* benefits and protects the public, provides standards for delivering financial planning, and advances financial planning as a distinct and valuable profession. Compliance with the *Code and Standards* is a requirement of CFP® certification that is critical to the integrity of the CFP® marks. Violations of the *Code and Standards* may subject a CFP® professional to discipline.

The CFP® professionals of Castle will also review the complete CFP Board Code of Ethics and Standards of Conduct and the Practice Standards to ensure proper implementation within the firm.

Wrap Fee Program

Castle offers portfolio management services to Wrap fee programs. We manage the wrap fee program portfolios the same we would any non-wrap fee portfolio. Clients participating in a wrap fee arrangement pay a single fee for advisory, brokerage and custodial services. Clients' portfolio transactions will be executed without commissions in a wrap fee arrangement. We receive a portion of the wrap fee for our investment advisory services. Please refer to Appendix 1 of Form ADV: Wrap Fee Program Brochure for further details.

Item 5 - Fees and Compensation

All client's Fee Structures are outlined in their agreements with Castle. The information provided below is a guideline for the fee structures. Castle reserves the right to modify the fee structures listed below.

We believe as a result of a fee-based cost structure, Castle is able to provide objective advice and personalized recommendations unique to each individual. The annual fee for portfolio management will be charged as a percentage of assets under management, according to the sliding marginal rate schedule below:

Assets under management	Annual Fee (%)
$0 - $10,000,000	1.00%
Next $10,000,000	0.50%
All Over $20,000,000	0.25%

A minimum annual fee of $2,000 for assets under management is required for this service. For certain account relationships Castle will aggregate related accounts (households) in order to meet this minimum annual fee requirement. Fees are calculated in arrears on the last business day or the beginning of the month or quarter on the household aggregated assets under management, including accrued interest and payable monthly or quarterly. Castle reserves the right to waive the minimum fee.

For 529 accounts, we charge a flat advisory fee of 0.40%. Investments within the 529 plan, such as those in the Brighter Future Advisor Plan, are subject to additional underlying management fees. We utilize a non-commission, institutional platform through iShares, which means our advisors do not receive commissions on these investments and clients benefit from institutional pricing that is typically lower than what is available to retail investors.

Accounts custodied at Schwab that are only cash or money market funds may be charged a flat advisory fee of 0.25%. Because interest rates on these investments can vary and may be low, it's possible for the advisory fee to be higher than the income earned.

Negotiability of Fees

In certain circumstances, all fees and account minimums may be negotiable.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. It is our policy to give a 30-day written notice when terminating a client. Upon termination of any account, prepaid and/or unearned fees will be promptly refunded while any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. All fees shall be prorated to the date 30 days after the termination receipt.

All investment advisory fees paid to Castle are separate and distinct from costs incurred by any third-party investment product or service such as mutual funds and ETFs to their shareholders. These expenses are described in each fund's prospectus and will usually consist of a management fee, other fund expenses, and possibly a distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Castle, nor any of our supervised persons receive any portion of the third-party fees, such as commissions, asset-based sales charges, or any services fees.

Clients have the option of investing in a mutual fund directly, without the services of Castle. In that case, Castle would not facilitate the transaction and assist the client in determining the most appropriate mutual fund(s) based upon the unique financial situation of the individual. Accordingly, the client should review both the fees charged by the mutual funds and those of Castle to fully understand the total cost to be paid and the advisory services being provided.

Portfolio Management

Castle does not have the discretion to choose a particular broker/dealer. Rather, the client must direct us as to the broker/dealer to be used in servicing that client account.

Any broker/dealer relationship which would adversely affect the servicing of the client may be denied by Castle.

Castle participates in the Schwab Institutional services program offered to independent investment advisors by Schwab, an unaffiliated FINRA-registered broker-dealer. As part of this program, Castle receives benefits it would not otherwise if investment advice was not offered. (See "Other Financial Industry Activities and Affiliations" for further information).

Clients in need of brokerage and custodial services will have Schwab, or Brighter Future Advisor Plan recommended to them, for the client to choose from.

Money Manager Search and Monitoring

Castle may perform management searches of various independent registered investment advisors on behalf of a client. There is no obligation on behalf of the client to use any product or service offered by any independent registered investment advisor recommended by Castle. If Castle believes a particular independent adviser is performing inadequately, Castle may suggest the client contract with a different adviser (third-party separate account manager). Under this scenario, Castle will assist the client in selecting a new adviser and then monitor that adviser's performance. The move to any new manager is solely at the discretion of the client. Castle charges for its

selection and monitoring service 25bps, or ¼ of 1%, on top of the fee the selected money manager charges. In certain circumstances, these fees and account minimums may be negotiable.

Alternative Investments

Sourcing

The investment committee sources alternative investments, which include but are not limited to private equity, hedge funds and private debt, through various channels. These include investments referred by clients, and conferences. The offerings of units, shares, or interests in private alternative investment vehicles (Funds) are not registered under the U.S. Securities Act of 1933, as amended (the "Securities Act"), and the Funds are not registered under the U.S. Investment Company Act of 1940, as amended (the "Investment Company Act"). Private Funds have additional risks including illiquidity and lack of disclosure when compared to public market securities. These risks are described in the offering documents of each investment, and the investor agrees to bear such risks by executing the subscription documents. Some clients may own no private Funds, either because they are not Qualified or Accredited, or because they are not willing to accept the additional risks.

A team of the Managing Member and the Portfolio Manager leads the investment evaluation process and prepares a summary for investment committee review, frequently with staff assistance. Summary includes investment opportunity's overview, expected returns, terms and manager information. The summary, along with the investment vehicle documents, is submitted to the investment committee for review and approval. Once approved, the Managing Member and the financial planners inform clients who meet criteria below of private alternative investment vehicle (Fund) availability.

Client Criteria

Clients that have an Investment Policy Statement as defined under "Item 4 – Advisory Business: Our Process" section that calls for a target alternative investment allocation of at least 10% of assets under management. Target minimum household size is $200,000. Consulting and non-discretionary clients are not subject to the Client Criteria.

Castle seeks to diversify private alternative investments within the household's IPS. Minimum investment amounts range between $100,000 and $250,000. Castle will recommend putting at least two private investments in each household over time. New clients may be placed in liquid hedge fund vehicles from our approved list, the same as clients with investable assets under two million dollars, until approved and available investments are found.

Investors need to be either one of the following depending on the specific investment vehicle (Fund)

"Accredited Investor" as such term is defined in Rule 501(a) of Regulation D promulgated under the Securities Act.

- The Purchaser had individual annual income in excess of $200,000, or joint annual income together with a spouse in excess of $300,000, in each of the two most recent years for which the Purchaser has filed U.S. federal income tax returns.
- The Purchaser has an individual net worth, or a joint net worth together with a spouse, in excess of $1,000,000. "Net worth" means total assets (excluding a primary residence) at fair market value less total liabilities. In calculating total liabilities, debt secured by the primary residence is included only to the extent that it (a) exceeds the fair market value of the residence or (b) was incurred during the last 60 days (unless incurred to acquire the residence)

"Qualified Purchaser" as such term is defined in Section 2(a)(51) of the Investment Company Act and the rules thereunder.

- A person with not less than $5 million in investments
- A company with not less than $5 million in investments owned by close family members

- A trust, not formed for the investment, with not less than $5 million in investments
- An investment manager with not less than $25 million under management
- A company with not less than $25 million of investments
- A company (regardless of the amount of such company's Investments) beneficially owned exclusively by Qualified Purchasers.

Implementation

Castle submits subscription paperwork and funds on behalf of clients who approve of placement. Castle is listed as an additional contact for all clients invested to ensure Fund documents including statements are received and used for monitoring. The firm maintains the list of investors who meet criteria listed under "Client Criteria" section. The Investment Committee maintains a file of alternative investments approved and used on behalf of clients.

Billing

Clients are responsible for expenses charged by a specific investment vehicle (Fund) as outlined in each Fund's applicable confidential offering memorandum. Castle bills clients for alternative investments using its standard AUM fee schedule on the aggregate fair market value of the net assets of a Fund, in addition to the fund charges. Aggregate fair market value is obtained from statements issued by each Fund manager, usually on a monthly or quarterly basis. Castle bills on the most recent estimated market value available, sometimes using estimated returns supplied by the Fund. There is a risk that billing may be inaccurate for a given month end and quarter end as actual statements with updated fair market values may be provided by Fund managers weeks after month and quarter end. We do recalculate a bill for a later adjustment to value by the fund management, we bill with the best estimates we have when we calculate our bills, usually during the next billing period.

Consulting Service

Clients may also receive investment advice on a more limited basis. This may include advice on only isolated area(s) of concern such as estate planning, retirement planning, or any other specific topic. Castle also provides consultation and administrative services regarding investment and financial concerns of the client.

All consulting recommendations made are not of a particular product or service offered by a broker/dealer or insurance company; rather, they are generic in nature. If a client wants us to help them execute a need for an insurance product, we utilize their preferred insurance agent. When the clients have none, we usually recommend more than one and include an online no-load or low-load provider.

We have turned down consulting engagements that are too small, and we prefer to give these services to only our existing clients, for which we charge no additional fees. We may stop providing these services on an hourly basis at any time.

Consulting fees, including standalone Financial Planning, will be charged in one or both of two ways:

1. As a fixed fee, typically ranging from $2,500 and up, depending upon the nature and complexity of each client's circumstances along with the mutual agreement of the client. Half of this fee may be due upon the inception of the advisory relationship, with the balance remaining due upon completion of the consulting service.
2. On an hourly basis, ranging from $100 to $450 per hour, depending on the nature and complexity of each client's circumstances as well as mutual agreement of the client. An estimate for total hours will be determined upon the start of the advisory relationship, with 50% of the related fee due upon inception of services. Any remaining balance (based on actual hours) would be paid upon completion of the consulting service.

Castle will not hold client funds greater than $1,200 for more than six months in advance of completing the consulting service.

Other Fee Considerations

Whenever the fee is calculated based on a percentage on the value of the assets under management, the values from our third-party portfolio management system are used. The values from the third-party portfolio management system may vary from your custodian due to various reasons such as pricing services and accounting methods utilized, such as trade date versus settlement date.

Unless otherwise noted in the client agreement or fee schedule, we consider cash as an asset class and will manage it as we do all asset classes in our clients' portfolios. Fees charged on the portfolio's asset classes could outweigh the return of any asset class or individual asset. At the discretion of Castle and depending on the facts and circumstances, we may waive the fee on large cash balances.

If a fee calculation is not accurate due to valuation timing, accounting methods, or other reasons, Castle will correct the fee by refunding the client or crediting their next billing cycle for all amounts over $5 to accommodate administrative processing.

Item 6 - Performance-Based Fees and Side-By-Side Management

Castle Wealth Management does not have any performance-based fee arrangements. (Fees based on a share of capital gains on or capital appreciation of the assets of a client). "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Castle has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Castle provides customized wealth management and financial planning services to high-net-worth individuals, individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations. Castle's current new client minimum is $500,000 of investable assets. These minimums are negotiable at Castle's discretion based on the facts and circumstances of each prospective client relationship.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Our success is a direct result of the relationships we build with our clients. Our goal is to provide personalized service with current financial knowledge to address clients' overall needs and financial goals.

Once an in-depth financial review of the client is completed, Castle develops individualized asset allocation. We use a software application that utilizes modern portfolio theory to assist us. Often times, any account holdings not managed directly by the firm will be taken into consideration in order to maximize returns and minimize potential tax implications.

Asset allocation among clients' portfolios is well diversified in order to reduce the inherent market risk of equity backed securities. Castle will create a portfolio based on the individualized IPS created during the initial phase of financial planning. Clients reserve the right to place reasonable restrictions on the types of investments used during this process based on risk tolerance. Individual ownership of assets will always be retained by the client.

Examples of methodologies that our investment strategies may incorporate include:

Asset Allocation – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. Asset Allocation has the potential of all the risks listed below.

Dollar-Cost Averaging – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time. Dollar-Cost Averaging has the potential of all the risks listed below.

Technical Analysis – involves studying past price charts, patterns, and trends in the financial markets to predict the direction of both the overall market and specific stocks. Technical Analysis has the potential of all the risks listed below.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Long-Term Purchases have the potential of all the risks listed below.

Short-Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term Purchases primarily have the potential of Market Risk, Business Risk, and Liquidity Risk as listed below.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Castle's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. Castle's approach focuses on taking appropriate risks for which clients are compensated (i.e., market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e., individual stock risk or lack of portfolio risk).

<u>Risk of Loss</u>

All investments involve the risk of loss of your principal (invested amount) and any profits that have not been realized (the securities have not been sold to "lock in" the profit). Markets can be volatile, and prices of stocks, bonds, and other investments can fluctuate substantially over time. Other factors such as economic and political events can also affect the performance of your investments. There is no guarantee that you will not lose money or that you will meet

your investment objectives. We encourage you to discuss any questions with us regarding our investment philosophy and your portfolios throughout the course of our relationship.

Listed below are some potential risks with any investment:

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

Event Risk. An adverse event affecting a specific company or that company's industry could depress the price of a client's investments in that company's stocks or bonds. The issuer could become unable to handle its debt service or receive a downgraded credit rating by a rating agency.

Liquidity Risk. Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions. Some securities may be infrequently or thinly traded even under normal market conditions.

Political Risk. The events that occur in the home country of the foreign company may impact valuations. Events such as revolutions, nationalization, currency collapse or other types of events can have a negative impact on the security.

Inflation Risk. Inflation is a general upward movement of prices reducing your purchasing power, which is a risk for investors receiving a fixed rate of interest. The concern for individuals is that inflation will erode returns.

Management Risk. Castle 's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of the client's portfolio may suffer.

Cash Management Risks. The firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

Equity-Related Securities and Instruments. The firm may take long positions in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

Fixed Income Securities. Fixed income securities are subject to the risk of the issuers or a guarantor's inability to meet principal and interest payments on their obligations and to price volatility. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Municipal Securities Risk. The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water, and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over- the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

Interest Rate Risk. An increase in interest rates could depress the prices of bonds and other fixed income securities in a client's portfolio.

Mutual Funds and ETFs. An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual funds and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event, they sell securities for a profit that cannot be offset by a corresponding loss. Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value "NAV," plus any shareholders' fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

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

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

Derivative Risk. Investing and engaging in derivative instruments or derivative transactions such as options, commodity funds and commodity exchange traded funds may involve different types of risk and possibly greater levels or risks such as those listed below.

Leverage Risk. A derivative instrument or transaction may disproportionately increase an account's exposure to the market for the assets underlying the derivative position and the sensitivity of an account's portfolio to changes in market prices for those assets.

Counterparty Credit Risk. An account's ability to profit from a derivative contract depends on the ability and willingness of the other party to the contract "counterparty" to perform its obligations under the contract. If the

counterparty to an over-the-counter contract fails to perform its obligations, an account may lose the benefit of the contract and may have difficulty reclaiming any collateral that an account may have deposited with the counterparty.

Lack of Correlation. The market value of a derivative position may correlate imperfectly with the market price of the asset underlying the derivative position. If a derivative position is being used to hedge against changes in the value of assets in an account, a lack of price correlation between the derivative position and the hedged asset may result in an account's assets being incompletely hedged or not completely offset price changes in the derivative position.

Illiquidity. Over-the-counter derivative contracts are usually subject to restrictions on transfer, and there is generally no liquid market for these contracts. Although it is often possible to negotiate the termination of an over-the-counter contract or enter into an offsetting contract, a counterparty may be unable or unwilling to terminate a contract with an account, especially during times of market instability or disruption. The markets for many exchange-traded futures, options, and other instruments are quite liquid during normal market conditions, but this liquidity may disappear during times of market instability or disruption.

Less Accurate Valuation. The absence of a liquid market for over-the-counter derivatives increases the likelihood that Castle Wealth Management will be unable to correctly value these interests.

Tax Harvesting Risk. Efficient tax-loss harvesting is an important component of a customized portfolio approach. Tax harvesting is a strategy where an ETF or mutual fund is sold at a taxable loss and replaced with a security whose historical performance and expected future performance are similar, thereby having little impact on the overall strategic allocation, but capturing the tax loss. Because past performance is no indication of future performance, there is potential for the future performance of the replacement position to deviate from that of the initial holding. This type of strategy may also incur an increase in the frequency of trading and amount of transaction costs.

Real Estate Risk. REIT share prices may decline because of adverse developments affecting the real estate industry and real property values. In general, real estate values can be affected by a variety of factors, including supply and demand for properties, the economic health of the country or different regions, and the strength of specific industries that rent properties. Some of our investment strategies require that you maintain a margin account. Clients who purchase securities may pay for them in full or may borrow part of the purchase price from the broker-dealer that holds his/her account. Clients generally use margin to leverage their investments and increase their purchasing power. At the same time, clients who trade securities on margin incur the potential for higher losses. We will discuss the risks of using margin with clients to determine if it is appropriate.

Retirement Rollovers. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and could engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If we recommend that a client roll over their retirement plan assets into an account to be managed by us such a recommendation creates a conflict of interest if we earn an advisory fee on the rolled over assets, which in most cases will be greater than the fees being paid in a 401K plan. When we make the recommendation to rollover retirement accounts, we are acting as a fiduciary where we are required to act in your best interest. No client is under any obligation to rollover retirement plan assets to an account managed by us.

Cybersecurity. The technology systems of the firm and its respective service providers may be vulnerable to inadvertent or deliberate interruption and consequent damage from technical or human sources. In addition to natural catastrophes, service/power outages, and network or telecommunications failures, security breaches and intrusion by unauthorized persons could result in damage, disruption, and theft of data, including investor

information. The firm has implemented cybersecurity procedures meant to address these risks. Nevertheless, given firm's fundamental dependence on technology, a cyber-attack or similar technology disruption could have a material adverse impact on Clients. Additionally, there are inherent limitations in cybersecurity policies and procedures and controls including the possibility that certain risks have not been identified. The firm has conducted limited due diligence and risk assessments of third-party providers. However, the firm is not able to control the cybersecurity plans, breach notifications, incident response plans and controls put in place by other services providers and/or the issuers in which the client invests. It is in the client's best interests to monitor all of his or her accounts on a regular basis and stay informed of cybersecurity best practices.

Emerging Technology. From time to time, we can use emerging technologies, such as artificial intelligence ("AI"), as a complement to operational and investment research processes. We can also invest in companies developing or leveraging emerging technology. Emerging technology and AI are wide-ranging terms and include a broad spectrum of technologies and applications, such as machine learning, deep learning, neural networks, and natural language processing, that are quickly evolving. Such emerging technology and AI present unique risks. For example, the automation of tasks previously performed by humans can potentially lead to job displacement and economic disruption. Data privacy concerns arise when AI systems collect and analyze vast amounts of personal data, which can be misused or inadequately protected. Additionally, the rapid development of these technologies often outpaces the creation of appropriate regulations, resulting in ethical challenges such as bias in AI algorithms and the potential for misuse in surveillance, investment decisions or other biases. New security vulnerabilities can also emerge as AI tools are developed, making systems potentially more susceptible to cyberattacks when using emerging AI technologies.

Castle cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Clients need to understand that investment decisions made for their accounts by Castle are subject to various risks. The investment decisions Castle makes will not always be profitable nor can Castle guarantee any level of performance.

The information contained in this brochure cannot disclose every potential risk associated with an investment strategy, nor all of the risks applicable to a particular manager, security, or investment. Risks vary by client according to their investment objectives, guidelines, liquidity needs or risk tolerance and not every strategy or portfolio will be exposed to each of the risks described in this brochure. This list is not intended to be exhaustive of all of the risks associated with investing in strategies or securities that are utilized or recommended by Castle. Rather, it is a general description of the nature and risks of the investment advisory services provided by Castle and the related investments.

Item 9 - Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Castle or the integrity of the firm. Castle has no information to report applicable to this Item.

Item 10 - Other Financial Industry Activities and Affiliations

Divine Blalock Martin and Sellari, LLC, Public Accounting Firm

Castle has previously received a significant number of referrals from the Public Accounting Firm "Divine Blalock Martin and Sellari, LLC" (DBMS). Our Investment Committee Member, Gary Sellari, CPA, is the Tax Matters Partner of DBMS, and Mr. Sellari is a minority equity member of Castle and a majority equity member of DBMS. Mr. Sellari of DBMS joins us as a paid consultant weekly for our two-hour Account Review committee meeting, and Quarterly

Investment Committee meetings. Mr. Sellari no longer receives a referral fee for new client referrals. The DBMS website is dbmscpa.com.

Each company is owned and operated independently from the other. As a result, there is never any obligation on behalf of the client to use one or both companies at the same time. Castle will no longer be paid for referring new clients to DBMS, but if that should change the fee does not increase the accounting fees paid by the client to the accounting firm. Castle is aware of the applicable Federal and/or State laws, which will be observed, and appropriate disclosures will be made.

Other Professional Referral Sources

Castle's highly customized, integrated approach to wealth management includes working closely with accounting, legal, and insurance firms. We have made arrangements with these and other professional referral sources (Referral Sources) to pay them a referral fee. This in no way increases the fees the client is charged. All applicable Federal and or State laws are observed, and appropriate disclosures are made.

Please refer to Item 14 Client Referrals and Other Compensation for further information.

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

Castle Wealth Management has adopted a Code of Ethics and Professional Responsibility for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics and Professional Responsibility includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of 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 Castle must acknowledge the terms of the Code of Ethics and Professional Responsibility. The firm abides by the CFA® Institute's Asset Manager Code of Professional Conduct and employees abide by the CFP® Board's Code of Ethics and Professional Responsibility and the CFA® Institute's Code of Ethics & Standards of Professional Conduct.

Castle anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Castle has management authority to effect and will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which Castle, its affiliates and/or clients, directly or indirectly, have a position of interest.

Subject to satisfying this policy and applicable laws, officers, directors, and employees of Castle and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Castle clients. Both Codes of Ethics are designed to assure that the personal securities transactions, activities, and interests of the employees of Castle will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Codes, Castle or individuals associated with Castle may buy or sell securities identical to those recommended to customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations present a conflict of interest, Castle has established the following restrictions in order to ensure it meets its fiduciary responsibilities:

1. A member, manager, or employee of Castle shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Castle shall prefer his or her own interest

to that of the advisory client. Castle employees may take participation in block trades of large equity or bond positions, normally as an aid to the firm in reaching a round lot for these purchases. However, if the employee is also a fee-paying client of the firm, their account shall be handled as all other fee paying clients.

2. Castle maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed and approved on a quarterly basis by the Investment Committee (IC).
3. Castle emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where Castle is granted discretionary authority of the client's account. Usually, clients' written wishes are honored.
4. Castle requires all individuals act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
5. Any individual not in observance of the above may be subject to termination.
6. The CCO is responsible for monitoring the activities of the staff to ensure compliance with the Code of Ethics.

The firm shall recommend internal cross-transactions when there is an objective determination that makes sense from an investment and cost standpoint. We have established policies and procedures to address potential conflicts of interest that could arise when we cause cross-trading. Conflicts may arise when we recommend an internal cross transaction between two or more of our client's asset(s). We may favor one client or group of clients over another. One client could inadvertently advantage over the other client. We have established internal policies and procedures to eliminate or reduce our conflicts. Among other things, the policy prohibits us from benefiting from internal cross transactions and requires that neither participating account is advantaged over the other. Cross trades will not occur in ERISA plan accounts in accordance with ERISA rules and regulations. We shall disclose the trade to the client(s) along with this disclosure.

Castle's clients or prospective clients may request a copy of the firm's Code of Ethics and Professional Responsibility by contacting Christina Worley, CPA/PFS, CFP®, CFA® - Managing Member.

Item 12 - Brokerage Practices

The Custodian and Brokers We Use

We recommend to you to use Schwab, a registered broker-dealer, member SIPC, as a qualified custodian. We generally recommend Brighter Future Advisor Plan for 529 Plans. We are independently owned and operated and are not affiliated with any of these institutions. These custodians will hold your assets in a brokerage account and buy and sell securities when (we/you) instruct them to. While we recommend that you use any of these firms as custodian/broker, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. Castle will assist in the new account opening process. We do not require clients to use a particular broker/dealer or other custodian selected by Castle. Even though your account is maintained at any of these firms, we can still use other brokers to execute trades for your account as described below (see "Your Brokerage and Custody Costs").

How We Select Brokers/Custodians

While Castle does not have the express authority to choose a particular broker/dealer on behalf of the client, our firm recommends using a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts
- Breadth of available investment products (stocks, bonds, mutual funds, ETFs, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us")

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, they generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. For some accounts, they may charge you a percentage of the dollar amount of assets in the account in lieu of commissions.

The commission rates and asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain custody of their assets in accounts at Schwab. We believe this commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be otherwise. In addition to commissions and asset-based fees, the custodians charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have your custodian execute most trades for your account. We have determined that having the custodian execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians").

Products and Services Available to Us

Schwab provides us and our clients with access to its institutional brokerage— trading, custody, reporting, and related services—many of which are not typically available to retail customers. Custodians provide us with some support services which help us manage or administer our clients' accounts, while others help us manage and grow our business. The custodians support services generally are available on an unsolicited basis (we do not have to request them) and at no charge to us as long as our clients collectively maintain a total of at least $10 million of their assets in accounts at the custodian.

Services That Benefit You

Our custodians' institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through them include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both of their own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained there. In addition to investment research, the custodians also make available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services That Generally Benefit Only Us

The custodians also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. They may also discount or waive fees for some of these services or pay all or a part of a third party's fees. They may also provide us with other benefits, such as occasional business entertainment of our personnel, or discounts on the costs of some of our application programs.

Our Interest in our Custodians' Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for their services so long as our clients collectively keep a total of at least $10 million of their assets in accounts with them. Beyond that, these services are not contingent upon us committing any specific amount of business to them in trading commissions or assets in custody. The $10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving their services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of these custodians and brokers is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "*How We Select Brokers/Custodians*") and not their services that benefit only us. We have more than $354 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least $10 million of those assets at each Custodian to avoid paying quarterly service fees presents a material conflict of interest.

Additional Compensation

Castle is aware of the special considerations promulgated under Section 206(4)-1 of the Investment Advisers Act of 1940. As such, appropriate disclosures shall be made, and all applicable Federal and State laws will be observed. Please refer to Item 14 Client Referrals and Other Compensation for further information.

In addition, Schwab makes available to Castle many products and services that may not directly benefit clients' accounts. This includes software and technology enhancements, as well as facilitation in the servicing of affiliated accounts.

While Castle endeavors to always act in the best interest of the client, the firm's participation in Schwab programs is not solely based on cost or quality of custody which may inadvertently create a potential source of conflict.

Brokerage for Client Referrals

In selecting and/or recommending broker-dealers, we do not take into consideration whether we will receive client referrals from the broker-dealer or third-party.

Directed Brokerage

We do not routinely recommend, request, or require that a client directs us to execute transactions through a specified broker-dealer. In certain circumstances, we will allow a client to direct brokerage. However, in such directive, we will be unable to achieve the most favorable execution of client transactions. In a directed brokerage account, it may cost clients more money. Specifically, the client may pay higher brokerage commissions because we may not have been able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Due to the benefits received through participation in the Schwab program, it is favorable for the client to execute transactions through their Castle team at these recommended brokers. Participation in these programs affords clients the opportunity to receive benefits which would not otherwise be received if Castle did not offer investment advice.

Mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors are made available to our clients. In addition, clients may pay higher brokerage commissions since orders are not able to be aggregated to reduce transaction costs. Finally, although benefits received through participation in the Schwab program may depend upon the amount of transactions directed to, or amount of assets custodied by Schwab, the client still receives advantageous trading execution tools it normally would not have access to if acting independently of Castle.

While the purchase and/or sale of securities for client accounts is not aggregated, there may be times Castle deems it necessary to enter "block trades." When placing orders of more than 100,000 shares per equity, it is in the best interest of Castle to sell and/or buy equities in large quantities at a set rate. This promotes stable pricing of assets being traded in large quantities in order to continue providing sound management of all portfolios.

Each client account is still managed separately in order to maintain the overall financial objective of each individual IPS. Castle always acts in the best interest of the client; aggregating client orders may pose adverse effects in daily management of client accounts.

Clients are free to select any broker. However, the Client may pay a higher or lower commission, and the firm may not be able to aggregate orders to reduce cost. When clients select brokers other than Schwab it will be considered a directed brokerage situation. Directed brokerage is defined when a client "directs" the firm in writing to utilize a certain broker/dealer(s) for execution of trades. Under these circumstances, the firm still has a fiduciary obligation to its clients and will disclose in writing that due to the arrangement, the client may not receive best execution, be able to participate in aggregated trades nor will the firm negotiate trading costs.

Best Execution

When given discretion to select the brokerage firm that will execute orders in client accounts, Castle shall seek "best execution" for client trades, which is a combination of several factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, execution could occur with brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions could include proprietary or third-party research (or any combination) and could be used in servicing any or all of Castle's clients. Therefore, research services received may not be used for the account for which the particular transaction was affected.

Clients may direct us to place trades with brokers other than the recommended brokers used by us through a "trade-away" arrangement or other arrangement that will be agreed upon by us and you through our agreement or the brokerage documentation. In the event we transact trades at your direction to an outside broker, we may not be able to seek best execution on your behalf, since we may not be able to aggregate orders, or negotiate commission rates.

Administrative Trade Errors

From time to time, we may make an error in submitting a trade order on your behalf. Trading errors may include several situations, such as:

- The wrong security is bought or sold for a client,
- A security is bought instead of sold,
- A transaction is executed for the wrong account,
- Securities transactions are completed for a client that had a restriction on such security, or
- Securities are allocated to the wrong accounts.

When this occurs, we may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the corrective action, the gain will remain in your account unless it is legally not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If a loss occurs due to an administrative trade error, we are responsible and will pay for the loss to ensure that you are made whole.

Note: To limit the respective administrative expenses and burden of processing small trade errors, it should be noted some custodians (at their own discretion) may elect not to invoice us if the trade error involves a de minimis dollar amount (usually less than $100). Generally, if related trade errors result in both gains and losses in your account, they may be netted.

Item 13 - Review of Accounts

While the underlying securities within Castle's Portfolio Management client accounts are monitored, these accounts will be formally reviewed by the Account Review Committee. Account Review Committee consists of at least a Partner of the firm, the Financial Planner for the account, and the trader on the account. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. Client portfolios and asset allocations are reviewed by the account review committee, at least annually for the smallest accounts, to quarterly for our largest accounts.

The purpose of the Investment Committee is to review and approve or change the ranking of the funds approved for the quarter on the Recommended Funds list.

Clients are currently reviewed during Account Review based on the following schedule:

Annualized Fees	Reviewed
$30,000 and up	4 times annually (Titanium)
$22,500-$30,000	4 times annually (Platinum)
$15,000 -$22,500	3 times annually (Gold)
$7,500 -$15,000	2 times annually (Silver)
<less than $7,500	1 time annually (Bronze)

Regular Reports Provided to Clients

- Portfolio Management

In addition to the monthly statements and confirmations of transactions Portfolio Management clients receive from their broker-dealer, Castle will provide quarterly reports to clients consisting of internal rates of return (time-weighted from inception, year to date, and previous quarter), positions, balances, additions/withdrawals, realized and unrealized gains and losses, cost-basis information, and interest/dividend information.

- Money Manager Search and Monitoring

These client accounts will receive reports from Castle, as contracted for upon inception of the client relationship.

- Consulting Service

Consulting clients receive reports as agreed upon at the inception of the advisory relationship.

Item 14 - Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Castle works closely with accounting, legal and insurance professionals in a fully integrated management approach to all portfolios. As such, in the event a professional promoter endorses Castle by referring prospective clients to Castle, we shall pay a percentage of the advisory fee to the promoter. We will not charge clients referred to us any fees or costs higher than our standard fee schedule offered to all of our clients. We will enter into a written agreement with all promoters and provide the referred clients with the details of the payment percentage. Castle does not pay any cash or non-cash compensation for testimonials from clients.

If the client is introduced to Castle by a referral source, the ADV Brochure and any required disclosure will be provided to the client.

At least annually, the firm will review all the third-party promoter referral arrangements.

Item 15 - Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account (or if you grant us authority to move your money to another person's account). We use various qualified custodians, Schwab, Brighter Future Advisor Plan, Millennium Trust, Vantage Retirement Plans, and Equity Institutional to maintain actual custody of client assets. Client funds and/or securities are held by "qualified custodians" as defined in the amended Rule 206(4)-2 of the Investment Advisers Act of 1940. As such, Castle does not provide clients with an audited balance sheet as a supplement to this disclosure brochure.

For client accounts that our employees or associated persons are trustees of, we do have custody. We are required to have an annual surprise audit by an unaffiliated CPA of these accounts. Our surprise audit results are on file with the SEC. The accounts we, or our related parties are trustees of, are charged no additional trustee fees, but they do share pro-rata in the cost of the Custody audit, required for SEC compliance. Last year this fee was less than $375 per trust account that our employees or related parties were trustees for.

Clients will receive account statements directly from their custodian at least quarterly. They will be sent to the email or postal mailing address provided to the custodian. Clients should carefully review those statements promptly when they receive them. We also urge clients to compare their custodian account statements to the periodic portfolio reports they receive from us. There may be slight variations in the reports due to accounting procedures, reporting dates or valuation methodologies of certain securities. Clients should contact us directly if they do not receive a statement from the custodian or if they have any questions regarding the statement.

Castle will take steps to ensure advisory clients receive account reports and/or statements directly from the qualified custodians holding client funds and/or securities.

We only have custody requiring an annual surprise audit as mentioned above.

We have custody not requiring an annual surprise audit if we have Standing Letters of Authorization only allowing Castle to change the amount and frequency of any money movements from the client's account to a third-party. In the event we do have this type of custody, we will ensure we are meeting the seven criteria outlined by the SEC. The qualified custodian will send you, at least quarterly, your account statements. The account statements will reveal the funds and securities held with the qualified custodian, any transactions that occurred in your account, and the deduction of our fee.

Item 16 - Investment Discretion

Castle usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and number of securities to be bought or sold. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives for the particular client account.

Investment guidelines and restrictions must be provided to Castle in writing.

For non-discretionary accounts, the client also generally executes a Limited Power of Attorney, which allows Castle to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the agreement between Castle and the client, Castle does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. As with discretionary accounts, clients can limit the terms of the Limited Power of Attorney, subject to Castle's agreement with the client and the requirements of the client's custodian.

Item 17 - Voting Client Securities

As a matter of policy, Castle currently shall not vote proxies for most of our clients. Clients will instruct the custodian, via the custodial documentation to have all proxy material delivered to them. Castle shall assist with this documentation. As a courtesy to the clients and if requested by the client, Castle will assist regarding the proxy.

However, a small portion of our clients have instructed Castle to vote proxies on their behalf. In these cases, Castle shall have the fiduciary responsibility for (a) voting in a manner that is in the best interests of each of the clients, and (b) properly dealing with potential conflicts of interest arising from proxy proposals being voted upon.

The policies and procedures of Castle ("the Advisor") for voting proxies received for accounts managed by the Advisor are set forth below and are applicable if:

- The underlying advisory agreement entered into with the client expressly provides that the Advisor shall be responsible to vote proxies received in connection with the client's account; or
- The underlying advisory agreement entered into with the client is silent as to whether or not the Advisor shall be responsible to vote proxies received in connection with the client's account and the Advisor has discretionary authority over investment decisions for the client's account (except in the case of third-party Separate Account Managers); or
- In case of an employee benefit plan, the client (or any plan trustee or other fiduciary) has not reserved the power to vote proxies in either the underlying advisory agreement entered into with the client or in the client's plan documents.

These Proxy Voting Policies and Procedures are designed to ensure that proxies are voted in an appropriate manner and in the best interest of each individual. Any questions about these policies and procedures should be directed to Christina Worley, CPA/PFS, CFP®, CFA®.

Consistent with SEC Rule 206(4)-6, as amended, the Advisor shall take reasonable measures to inform its clients of (1) its proxy voting policies and procedures, and (2) the process or procedures clients must follow to obtain information regarding how the Advisor voted with respect to assets held in their accounts. This information may be provided to clients through the Advisor's Form ADV (Part 2A) disclosure or by separate notice to the client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries).

Christina Worley, CPA/PFS, CFP®, CFA® (the "Responsible Party"), shall be designated by the Advisor to make discretionary investment decisions on behalf of the client and will be responsible for approving the voted proxies related to that client's account. The Responsible Party shall assume power to vote all proxies related to a client's account if any one of the three circumstances set forth earlier regarding proxy voting powers is applicable. The Responsible Party may utilize an outside Proxy voting service to assist and support this service. In the event an outside proxy voting service is used we shall conduct an initial due diligence and an annual due diligence to ensure the voting is done in the best interest of each client according to their objectives and all the records are properly maintained.

Prior to approving a vote, the Responsible Party will verify whether voting power is subject to any limitations or guidelines issued by the client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries).

If an actual or potential conflict is found to exist, written notification of the conflict (the "Conflict Notice") shall be given to the client or the client's designee (or in the case of an employee benefit plan, the plan's trustee or other fiduciary) in sufficient detail and with sufficient time to reasonably inform the client (or in the case of an employee benefit plan, the plan's trustee or other fiduciary) of the actual or potential conflict involved.

The Conflict Notice will either request the client's consent to the Advisor's vote recommendation or may request the client to vote the proxy directly or through another designee of the client. The Conflict Notice and Consent thereto may be sent or received, as the case may be, by mail, fax, electronic transmission, or any other reliable form of communication that may be recalled, retrieved, produced, or printed in accordance with the recordkeeping policies and procedures of the Advisor. If the client (or in the case of an employee benefit plan, the plan's trustee of other fiduciary) is unreachable or has not affirmatively responded before the response deadline for the matter being voted upon, the Advisor may:

- Engage a Non-Interested Party to independently review the Advisor's vote recommendation if the vote recommendation would fall in favor of the Advisor's interest (or any affiliate of the Advisor) to confirm that the Advisor's vote recommendation is in the best interest of each client under the circumstances;
- Cast its vote as recommended if the vote recommendation would fall against the Advisor's interest (or that of any affiliate of the Advisor) and such vote recommendation is in the best interest of the client under the circumstances; or
- Abstain from voting if such action is determined by the Advisor to be in the best interest of the client under the circumstances.

The Responsible Party will promptly vote proxies received in a manner consistent with the Proxy Voting Policies and Procedures stated above and guidelines (if any) issued by client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries if such guidelines are consistent with ERISA).

The Advisor shall keep certain records required by applicable law in connection with its proxy voting activities for clients and shall provide proxy-voting information to clients upon their written or oral request. Including the way, the proxy was voted for each client, when it was voted and provide such information to the clients when requested within thirty (30) days,

Clients may obtain a copy of Castle's complete proxy voting policies and procedures upon request. Clients may also obtain information from Castle about how Castle voted any proxies on behalf of their account(s).

Item 18 - Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Castle's financial condition. Castle has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. Since Castle does not collect fees in advance, more than $1,200 per client, six months or more in advance, audited financial statements are not required at this time.

FORM ADV PART 2B

BROCHURE SUPPLEMENT

880 N Congress Ave, Suite 302
Boynton Beach, FL 33426
(561) 686-9604
www.castlewm.com

CHRISTINA WORLEY, CPA/PFS® CFP®, CFA® (CRD no. 2417412)

MELISSA GANNON, CDFA®, CFP® (CRD no. 6333322)

SCOTT WORLEY (CRD no. 6593175)

This brochure supplement provides information about the supervised persons of Castle Wealth Management that supplements our Form ADV Part 2A brochure. You should have received a copy of that brochure. Please contact Christina Worley, Managing Member/Chief Compliance Officer at (561) 686-9604 or by email at cworley@castlewm.com if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about the supervisory persons listed below is available on the SEC's website at www.adviserinfo.sec.gov.

Christina Worley, CPA/PFS, CFP®, CFA®, Managing Member/Chief Compliance Officer

Item 2 – Educational Background and Business Experience

Christina Worley CPA/PFS, CFP®, CFA®, Managing Member / Chief Compliance Officer was born in 1962.

She earned a Bachelor of Economics from Wharton School of the University of Pennsylvania in 1982.

Christina was awarded the following designations:

Chartered Financial Analyst (CFA®) FL	2015
Certified Public Accountant (CPA) NY	1986
Certified Public Accountant (CPA) FL	1997
Personal Financial Specialist (PFS) FL	1998
Certified Financial Planner (CFP®) FL	2002

*Please see the designation descriptions below.

Prior to establishing Castle Wealth Management in 1997, Christina held the following positions:

Worley & Worley – Co-Owner	1993-1997

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised person providing investment advice. Christina has no information applicable to this Item.

Item 4 - Other Business Activities

Christina does not have any other outside Business Activities to report.

Item 5- Additional Compensation

Christina is only compensated for her role with Castle Wealth Management and does not receive any other compensation.

Item 6 - Supervision

Castle Wealth Management LLC has adopted and periodically updates its compliance manual. This manual includes a formal Code of Ethics and Insider Trading Policies and Procedures, which outline for each employee the rules and regulations they must adhere to. Castle Wealth Management LLC has appointed a CCO who reviews and monitors employee activity with respect to these rules and regulations. In addition, Castle Wealth Management LLC has adopted a Code of Ethics that requires each employee to act in the best interest of clients. Should you have questions related to these activities, please contact the CCO at the number listed on the cover page of this Brochure.

Melissa Gannon, CDFA® CFP®, Senior Relationship Manager, Member

Item 2 – Educational Background and Business Experience

Melissa Gannon CDFA®, CFP®, Senior Relationship Manager, Member, was born in 1966.

She earned a Bachelor of Science in Business Administration from the University of Dayton in 1988 and a Master of Business Administration (Concentration Finance) at Florida Atlantic University in 1998.

Melissa was awarded the following designations:

Certified Divorce Financial Analyst (CDFA®) FL	2016
Certified Financial Planner (CFP®) FL	2019

*Please see the descriptions below for the above designations.

Prior to joining Castle Wealth Management in 2016, Melissa held the following positions:

Best Life Financial Planning – Owner/Financial Planner	09/2014-09/2016
ACAMAR Global Investments – Managing Director	01/2013-08/2014
Independent Contractor (SNL Financial)	09/2013-02/2014

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised person providing investment advice. Melissa has no information applicable to this Item.

Item 4 - Other Business Activities

Melissa does not have any other outside Business Activities to report.

Item 5- Additional Compensation

Melissa is only compensated for her role with Castle Wealth Management and does not receive any other compensation.

Item 6 - Supervision

Castle Wealth Management LLC has adopted and periodically updates its compliance manual. This manual includes a formal Code of Ethics and Insider Trading Policies and Procedures, which outline for each employee the rules and regulations they must adhere to. Castle Wealth Management LLC has appointed a CCO who reviews and monitors employee activity with respect to these rules and regulations. In addition, Castle Wealth Management LLC has adopted a Code of Ethics that requires each employee to act in the best interest of clients. Should you have questions related to these activities, please contact the CCO at the number listed on the cover page of this Brochure.

Scott D. Worley, Chief Financial Officer

Item 2 – Educational Background and Business Experience

Scott D. Worley, Chief Financial Officer was born in 1960.

He earned a Bachelor of Science in Accounting from Lehigh University in 1982.

Scott has the following designations:

Series 65 License	2016
Florida General Contractors License	2002
Florida Real Estate Brokerage License	2009

*Please see the designation descriptions below.

In addition to his position at Castle Wealth Management as of October 2015, Scott holds the following positions:

Northstar Building Management, LLC – Managing Member	06/1999-Present
Northstar Homes Realty – Managing Member/Broker	06/1999-Present
ECO Water Technologies Corp – Chief Executive Officer/Chief Financial Officer	10/2017-05/2020

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised person providing investment advice. Scott has no information applicable to this Item.

Item 4 - Other Business Activities

Mr. Worley is the managing member working as a licensed general contractor with Northstar Building Management, LLC, which is construction/real estate development consulting related and is a non-investment activity. Mr. Worley works less than 2 hours per month during trading hours. Mr. Worley is also President/Licensed real estate broker at Northstar Homes Realty, Inc., performing limited real estate brokerage transactions and is a non-investment activity. Mr. Worley works less than two hours a month during trading hours.

Item 5- Additional Compensation

Scott is compensated for his role with Castle Wealth Management as well as the other business activities listed above. Scott does not receive commission sales awards, or other prizes for the recommendation of any securities assets to clients.

Item 6 – Supervision

Castle Wealth Management LLC has adopted and periodically updates its compliance manual. This manual includes a formal Code of Ethics and Insider Trading Policies and Procedures, which outline for each employee the rules and regulations they must adhere to. Castle Wealth Management LLC has appointed a CCO who reviews and monitors employee activity with respect to these rules and regulations. In addition, Castle Wealth Management LLC has

adopted a Code of Ethics that requires each employee to act in the best interest of clients. Should you have questions related to these activities, please contact the CCO at the number listed on the cover page of this Brochure.

Definitions of Accreditations:

Chartered Financial Analyst - CFA®

The CFA® Charter is a globally recognized, graduate-level investment credential awarded by the CFA Institute. Earning demonstrates a commitment to professional ethics and expertise with the broad range of skills needed for competitive careers in the investment profession.

To earn a CFA charter, one must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

CFA Program curriculum topics:

- Ethical and professional standards
- Quantitative methods
- Economics
- Financial reporting and analysis
- Corporate finance
- Equity investments
- Fixed income
- Derivatives
- Alternative investments
- Portfolio management and wealth planning

A commitment to professional ethics is at the core of CFA Institute.

CFA Institute members and CFA Program candidates are subject to professional conduct enrollment/admission criteria and must comply with the Code and Standards. Additionally, members must annually complete and sign a Professional Conduct Statement, disclosing any allegations of professional misconduct.

Certified Financial Planner - CFP®

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"). CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP® certification. You may find more information about CFP® certification at 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 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 requirements through other qualifying credentials.

- **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 the 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 hours 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*.

Certified Public Accountant - CPA

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensures as a CPA generally include a minimum of a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the CPA examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period).

Personal Financial Specialist - PFS

The PFS credential demonstrates an individual has met the minimum education, experience, and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and is encouraged to follow AICPA's Statement on Responsibilities in Financial Planning Practice.

Certified Divorce Financial Analyst - CDFA®

CDFAs are licensed by the Institute for Divorce Financial Analysts. Founded in 1993, the Institute is the premier national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena. CDFAs must have a minimum of three years of professional experience in finance or divorce, take

a four-part self-study course and must pass four examinations. Once a financial professional has obtained the CDFA designation, he or she must obtain 15 divorce-related hours of continuing education every two years.

The Series 65 License

The NASAA Investment Advisers Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA. The exam consists of 130 scored questions. Candidates have 180 minutes to complete the exam. In order for a candidate to pass the Series 65 exam, he/she must correctly answer at least 94 of the 130 scored questions. For additional information about this exam, including the content outline, please visit the exams page on the FINRA Website.

Florida General Contractors License

General contractors are hired by developers or property owners to organize construction work on various types of structures and projects, including residential homes, roads, office buildings, retail stores, government buildings, treatment plants and bridges. They hire and oversee subcontractors, buy materials, review architectural plans, and ensure deadlines are met. Every state has the same basic requirements for individuals who want to earn a contractor's license, but all require individuals to pass an exam. Some states may also require that contractors provide proof of liability insurance, a federal Tax Identification Number and proof of a business address by showing a utility bill or a lease. Practical experience in construction is very important in becoming a licensed contractor. This could be obtained by working in various crafts as an electrician, carpenter, or plumber. Supervisory experience in construction also helps.

Florida Real Estate Brokerage License

Real estate brokers must have completed 24 months as an active real estate sales associate for five years before becoming a licensed broker. Other requirements include:

- Complete 72-hour FREC-approved pre-licensing course for brokers
- Take and pass the Florida Real Estate Broker Examination with a grade of 75 or higher
- Complete a 60-hour FREC-approved post-licensing course for brokers before initial broker license expires

Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure
October 7, 2026

Form ADV, Part 2A, Item 1

Cover Page

Contact Information

Main Office Location
1880 N Congress Ave, Suite 302
Boynton Beach, FL 33426
(561) 686-9604
www.**castlewm**.com

Additional Office Location
15 East 5th Street
Jamestown, New York 14701

FORM ADV PART 2A APPENDIX 1

WRAP FEE PROGRAM BROCHURE

This wrap fee program brochure provides information about the qualifications and business practices of Castle Wealth Management, LLC ("Castle" or "Firm"). If you have any questions about the contents of this brochure, please contact us at (561) 686-9604. 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 Castle Wealth Management, LLC, is also available on the SEC's website at www.adviserinfo.sec.gov (CRD# 118364). The SEC's web site also provides information about any persons affiliated with Castle Wealth Management who are registered or are required to be registered as investment advisor representatives of Castle Wealth Management.

Castle Wealth Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Form ADV, Part 2A Appendix 1, Item 2

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes have occurred since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures no later than 120 days after our fiscal year end (12/31). We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (561) 686- 9604.

Material Changes since the Last Annual Update

Since the last annual filing in March 31, 2026, we have had no material changes to report. However, we have made the following changes:

- Item 5 - Disclosures of the firm's current new client minimum requirements.

Additionally, we have made other changes, some of which may clarify or enhance existing disclosures, but we do not consider these other changes to be material.

Currently, our Brochure may be requested free of charge by contacting Christina Worley, CPA/PFS, CFP®, CFA, Managing Member at (561) 686-9604, or by email at cworley@castlewm.com.

Form ADV, Part 2A Appendix 1, Item 3

Table of Contents

Item 1 Cover Page……1

Item 2 Material Changes……..2

Item 3 Table of Contents……3

Item 4 Services, Fees and Compensation……..4

Item 5 Account Requirements and Types of Clients……..9

Item 6 Portfolio Manager Selection and Evaluation……..9

Item 7 Client Information Provided to Portfolio Managers……16

Item 8 Client Contact with Portfolio Managers……..16

Item 9 Additional Information……16

Form ADV, Part 2A Appendix 1, Item 4

Services, Fees and Compensation

Background Information

All client's fee structures are outlined in their agreements with Castle. The information provided below is a guideline of the fee structures. Castle reserves the right to modify the fee structure listed below.

Castle Wealth Management provides customized wealth management and financial planning services to high-net-worth families, individuals, businesses, trusts, and charitable entities. Our firm was incorporated on October 9, 1997 as P.F.S. Advisors, L.C. D/B/A Castle Wealth Management, being the successor firm of Worley and Worley, a Florida Registered Investment Advisory firm. At the end of 2018, our legal name was changed from P.F.S. Advisors, L.C. to Castle Wealth Management, LLC (herein after Castle). Castle is primarily owned and overseen by its Managing Member and Founder, Christina Worley CPA/PFS, CFP®, CFA. Gary Sellari and Melissa Gannon are minority owners. For the complete ownership details please see Form ADV Part 1 Schedule A Direct Owners and Executive Officers at adviserinfo.sec.gov.

Assets Under Management

Our assets under management on a discretionary basis as of 12/31/2025 were $424,800,435 and $5,236,754 on a non-discretionary basis.

Our transactional flexibility provides product diversity, as well as offering third-party Separate Account Managers (SAMs) that we monitor before approving. Castle Wealth Management sponsors and offers a wrap fee program. Here is what you can expect from us:

How We Earn Your Trust

Our continued success is a direct result of the relationships we build with our clients. We are devoted to helping our clients achieve financial success. We reinforce our commitment by providing personalized service, coupled with current financial knowledge to address your individual needs and circumstances. Furthermore, it is our policy to respond to all client correspondence in a prompt manner. Our team places a premium on client interaction. Our clients rely on us for all of their investment needs, large or small, business, orpersonal.

Our Process

Castle provides Investment Supervisory Services, defined as giving continuous advice to a client or making investments on behalf of individual needs. Through careful discussion of goals and objectives based on the client's needs, Castle develops a financial plan unique to each individual. Once a specialized Investment Policy Statement (IPS) is established, a portfolio is then generated to reflect the mutually agreed upon asset allocation contained in the IPS.

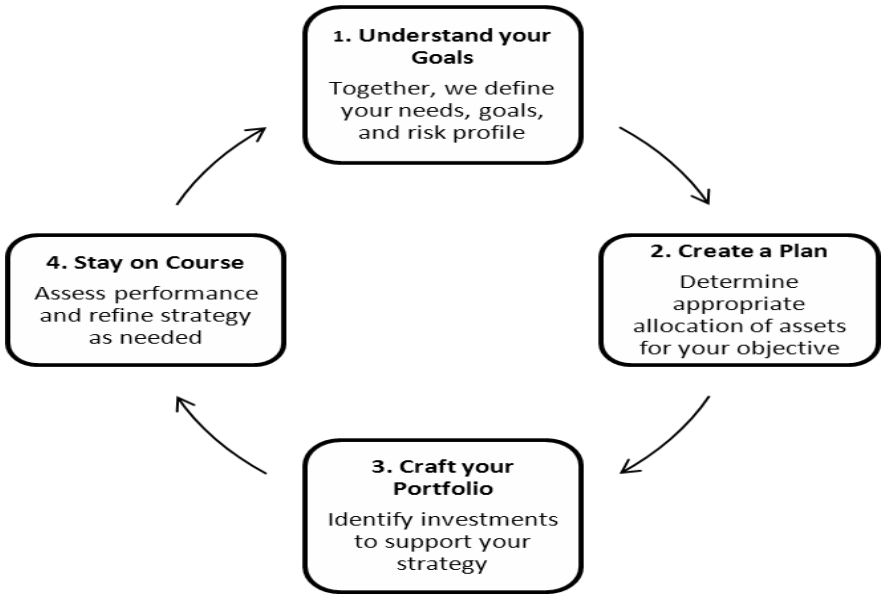
Each account managed by Castle is on a discretionary and/or non-discretionary basis as outlined in each household's IPS. Account supervision and monitoring are guided by the stated objectives contained in the IPS.

Portfolios managed by Castle may consist of one or all of the following: individual equities, bonds, variable annuities, mutual funds, exchange-traded funds (ETFs), CDs, alternative investments, REITs, and accounts managed by third-party Separate Account Managers with specific or specialized strategies. Variable annuities and mutual funds will be selected on the basis of any or all of the following: the fund's performance history, the industry sector, the track record of the fund manager, investment objectives and the overall management philosophy and fee structure.

Portfolio weighting between funds and market sectors will be determined by each client's IPS. Depending upon the risk tolerance and needs of the client, Castle may recommend the use of options (i.e., covered calls or protective puts). Clients will have the opportunity to place reasonable investment restrictions at any time based on risk tolerance. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.). Individual ownership of assets remains with the client at all times, with brokerage accounts normally custodied at Schwab and Brighter Future Advisor Plan (529-plans). We will use Equity Institutional, Millennium Trust and Vantage Retirement Plans as custodians for non-standard IRA assets.

Castle seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Castle's economic, investment, or other financial interests. We shall attempt to avoid, among other things, investment trading practices that systematically advantage or disadvantage certain client portfolios. We shall seek fair and equitable allocation of investment opportunities/transactions among our clients to avoid favoring one over another over time.

In the process below, each client is led on a path towards helping them seek long-term financial success:



The personalized attention each client receives combined with a strong client-advisor relationship is what helps build the foundation to our success. Our goal with each client is to meet their long-term financial objectives through a multi-disciplinary approach. With principles of safety and soundness at the heart of every client relationship, Castle is able to continue leading its clients on a path of long-term financial success.

What's Right for You?

Once the financial review is complete and a financial plan agreed upon, we will work diligently to design an individualized asset allocation.

Our planning considers all client holdings, even those we may not manage directly. Our transactional flexibility provides product diversity, as well as offering third-party Separate Account Managers (SAMs) that we monitor before approving. Here is what you can expect from us:

- Financial Planning, for as many specific goals as the client has, i.e., retirement, education, etc.
- Disciplined Portfolio Management
- Multigenerational Wealth Transfers
- Retirement & Estate Planning
- Insurance Reviews
- Asset Protection Planning
- Education Planning

Your Personalized Plan

For each client, Castle will produce a written individual IPS reflecting an agreed-upon asset allocation. Once the agreement is signed, we start investing on your behalf as appropriate to seek to meet your objectives. We meet with you to provide a forum to discuss life changes that may have an effect on your financial plan, and to determine if any financial changes or adjustments are necessary. We will also contact you to discuss the impact of current economic conditions on your portfolio. Ongoing portfolio reviews are conducted by our Investment Committee (IC). Adjustments may be made quarterly to ensure adherence to your asset allocation. We do not charge any additional fees for providing a financial plan to clients with more than $500,000 in assets under management that are investment advisory clients.

Our Mission

We strive to help you achieve success by providing personalized attention and a commitment to service that addresses not only today's needs but tomorrow's plans. Our dedication to helping you achieve your financial goals means we place a premium on timeliness, thoroughness, and accuracy.

Our Goal

We provide personalized service, coupled with current financial knowledge, to address your individual needs and circumstances. We guide you on a successful path toward meeting your financial goals by utilizing our well documented plans, which are designed to focus on the big picture, not short-term market variations. Why Clients Choose Us:

- Objective Advice
- Investment Diversity
- Transparent Reporting (performance, fees)
- Tax Efficient Portfolio Management
- Multi-disciplined Team

Asset Management

We shall comply with the CFA® Institute Asset Manager Code. The Asset Manager Code (the Code) outlines the ethical and professional responsibilities of firms that manage assets on behalf of clients. The principles and provisions address six broad categories: (1) loyalty to clients, (2) investment process and actions, (3) trading, (4) risk management, compliance, and support, (5) performance reporting and valuation, and (6) disclosures.

Wrap Fee Program

Castle offers portfolio management services to wrap fee programs. We manage the wrap fee program portfolios the same we would any non-wrap fee portfolio. We receive a portion of the wrap fee for our investment advisory services. Clients in the wrap fee program could have greater fees than those that have accounts in non-wrap fee program accounts, however fees will not exceed the fee schedule stated in this Wrap Fee Brochure.

Fees and Compensation

All clients' Fee Structures are outlined in their agreements with Castle. The information provided below is a guideline for the fee structures. Castle reserves the right to modify the fee structures listed below.

We believe as a result of a fee-based cost structure, Castle is able to provide objective advice and personalized recommendations unique to each individual. The annual fee for portfolio management will be charged as a percentage of assets under management, according to the sliding marginal rate schedule below:

Assets under management	Annual Fee (%)
$0 - $10,000,000	1.00%
Next $10,000,000	0.50%
All Over $20,000,000	0.25%

A minimum annual fee of $2,000 for assets under management is required for this service. For certain account relationships Castle will aggregate related accounts (households) in order to meet this minimum annual fee requirement.

Fees are calculated in arrears on the last business day or the beginning of the month or quarter on the household aggregated assets under management, including accrued interest and payable monthly or quarterly. Castle reserves the right to waive the minimum fee.

For 529 accounts, we charge a flat advisory fee of 0.40%. Investments within the 529 plan, such as those in the Brighter Future Advisor Plan, are subject to additional underlying management fees. We utilize a non-commission, institutional platform through iShares, which means our advisors do not receive commissions on these investments and clients benefit from institutional pricing that is typically lower than what is available to retail investors.

Accounts custodied at Schwab that are only cash or money market funds may be charged a flat advisory fee of 0.25%. Because interest rates on these investments can vary and may be low, it's possible for the advisory fee to be higher than the income earned.

Depending on the schedule determined in the client agreement, clients are generally direct debit billed in arrears at the end of each month, or each quarter based upon the value (market value or fair market value in the absence of market value on the last trading day of the prior month or quarter, plus any credit balance or minus any debit balance), respectively. Fees are directly debited on a monthly or quarterly basis from client accounts. Some clients are billed in the same manner as stated above; however, they send payment via check.

Negotiability of Fees

In certain circumstances, our fees may be negotiable. Our minimum account size is $500,000, but this is negotiable. A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. It is our policy to give a 30-day written notice when terminating a client. Upon termination of any account, prepaid and/or unearned fees will be promptly refunded while any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement. All fees shall be prorated to the date 30 days after the termination receipt.

All investment advisory fees paid to Castle are separate and distinct from costs incurred by any third-party investment product or service such as mutual funds and ETFs to their shareholders. These expenses are described in each fund's prospectus and will usually consist of a management fee, other fund expenses, and possibly a distribution fee. If the fund

also imposes sales charges, a client may pay an initial or deferred sales charge. Castle, nor any of our supervised persons receive any portion of the third-party fees, such as commissions, asset-based sales charges, or any services fees.

The fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or ETF which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), fees for trades executed away from the custodian, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

As Castle absorbs certain transaction costs in wrap fee accounts, Castle may have a financial incentive not to place transaction orders in those accounts since doing so increases its transaction costs. Thus, an incentive exists to place trades less frequently in a wrap fee arrangement.

Clients have the option of investing in a mutual fund directly, without the services of Castle. In that case, Castle would not facilitate the transaction and assist the client in determining the most appropriate mutual fund(s) based upon the unique financial situation of the individual. Accordingly, the client should review both the fees charged by the mutual funds and those of Castle to fully understand the total cost to be paid and the advisory services being provided.

Portfolio Management

Castle does not have the discretion to choose a particular broker/dealer. Rather, the client must direct Castle as to the broker/dealer to be used in servicing that client account.

Any broker/dealer relationship which would adversely affect the servicing of the client may be denied by Castle.

Castle participates in the Schwab Institutional services program offered to independent investment advisors by Schwab, an unaffiliated FINRA-registered broker-dealer. As part of this program, Castle receives benefits it would not otherwise receive if investment advice were not offered. (See "Other Financial Industry Activities and Affiliations" for further information).

Clients in need of brokerage and custodial services will have Schwab, or Brighter Future Advisor Plan recommended to them, for the client to choose from.

Other Fee Considerations

Whenever the fee is calculated based on a percentage of the value of the assets under management the values from our third-party portfolio management system are used. The values from the third-party portfolio management system may vary from your custodian due to various reasons such as pricing services and accounting methods utilized, such as trade date versus settlement date.

Unless otherwise noted in the client agreement or fee schedule, we consider cash as an asset class and will manage it as we do all asset classes in our clients' portfolios. Fees charged on the portfolios' asset classes could outweigh the return of any asset class or individual asset. At the discretion of Castle and depending on the facts and circumstances, we may waive the fee on large cash balances.

If a fee calculation is not accurate due to valuation timing, accounting method, or other reasons, Castle will correct the fee by refunding the client or crediting their next billing cycle for all amounts over $5 to accommodate administrative processing.

Form ADV, Part 2A Appendix 1, Item 5

Account Requirements and Types of Clients

Castle provides Wrap Fee Program to high-net-worth individuals, individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and corporations. Castle's current new client minimum is $500,000 of investable assets. These minimums are negotiable at Castle's discretion based on the facts and circumstances of each prospective client relationship.

Form ADV, Part 2A Appendix 1, Item 6

Portfolio Manager Selection and Evaluation

Castle acts as the portfolio manager for a majority of the wrap fee program accounts on a discretionary or a non-discretionary basis. We use the same criteria to manage all the accounts, whether wrap or not at Castle.

Castle shall recommend unaffiliated managers to manage all or a portion of the client's portfolios. We shall select managers based on their ability to meet the client's objective. Castle shall review the unaffiliated managers' reports on client's accounts to ensure the client's objectives are being met. We may recommend the termination or replacement of unaffiliated managers based on the objectives of the client and overall performance of the unaffiliated managers.

We measure the performance of all portfolios managed by us or any unaffiliated managers based on the ability to meet the objectives of your portfolio.

The performance of Castle or any third-party may not be calculated on a uniform or consistent basis among all clients.

Castle may recommend a Wrap Fee Program for the client's account(s). A "Wrap Fee Program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. Castle provides discretionary investment advisory services to some of its clients through a Wrap Fee Program. Castle will assist clients in determining the suitability of the Wrap Fee Program for the client. Wrap Fee Program accounts recommended by Castle are not managed differently from non-Wrap Fee Program accounts. Because brokerage execution costs are included in the client's overall advisory fee, the client's fee may be greater than those that have accounts in non-Wrap Fee Program accounts; however, fees will not exceed the fee schedule stated in this Wrap Fee Brochure. All clients with Wrap Fee Program accounts will be provided with this Wrap Fee Brochure. This Brochure is focused on Wrap Fee Program accounts.

Performance-Based Fees and Side by Side Management

Castle Wealth Management does not have any performance-based fee arrangements (fees based on a share of capital gains on or capital appreciation of the assets of a client). "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Castle has no performance-based fee accounts, it has no side-by-side management.

Methods of Analysis, Investment Strategies, and Risk of Loss

Our success is a direct result of the relationships we build with our clients. Our goal is to provide personalized service with current financial knowledge to address clients' overall needs and financial goals.

Once an in-depth financial review of the client is completed, Castle develops individualized asset allocation. We use a

software application that utilizes modern portfolio theory to assist us. Often times, any account holdings not managed directly by the firm will be taken into consideration in order to maximize returns and minimize potential tax implications.

Asset allocation among clients' portfolios is well diversified in order to reduce the inherent market risk of equity backed securities. Castle will create a portfolio based on the individualized IPS created during the initial phase of financial planning. Clients reserve the right to place reasonable restrictions on the types of investments used during this process based on risk tolerance. Individual ownership of assets will always be retained by the client.

Examples of methodologies that our investment strategies may incorporate include:

Asset Allocation – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. Asset Allocation has the potential of all the risks listed below.

Dollar-Cost Averaging – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time. Dollar-Cost Averaging has the potential of all the risks listed below.

Technical Analysis – involves studying past price charts, patterns, and trends in the financial markets to predict the direction of both the overall market and specific stocks. Technical Analysis has the potential of all the risks listed below.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Long-Term Purchases have the potential of all the risks listed below.

Short-Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short- term Purchases primarily have the potential of Market Risk, Business Risk, and Liquidity Risk as listed below.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Castle's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. Castle's approach focuses on taking appropriate risks for which clients are compensated (i.e., market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e., individual stock risk or lack of portfolio risk).

Risk of Loss

All investments involve the risk of loss of your principal (invested amount) and any profits that have not been realized (the securities have not been sold to "lock in" the profit). Markets can be volatile, and prices of stocks, bonds, and other investments can fluctuate substantially over time. Other factors such as economic and political events also can affect the performance of your investments. There is no guarantee that you will not lose money or that you will meet your investment objectives. We encourage you to discuss any questions with us regarding our investment philosophy and your portfolios throughout the course of our relationship.

Listed below are some potential risks with any investment:

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

Event Risk. An adverse event affecting a specific company or that company's industry could depress the price of a client's investments in that company's stocks or bonds. The issuer could become unable to handle its debt service or receive a downgraded credit rating by a rating agency.

Liquidity Risk. Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions. Some securities may be infrequently or thinly traded even under normal market conditions.

Political Risk. The events that occur in the home country of the foreign company may impact valuations. Events such as revolutions, nationalization, currency collapse or other types of events can have a negative impact on the security.

Inflation Risk. Inflation is a general upward movement of prices reducing your purchasing power, which is a risk for investors receiving a fixed rate of interest. The concern for individuals is that inflation will erode returns.

Management Risk. Castle 's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of the client's portfolio may suffer.

Cash Management Risks. The firm may invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

Equity-Related Securities and Instruments. The firm may take long positions in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

Fixed Income Securities. Fixed income securities are subject to the risk of the issuers or a guarantor's inability to meet principal and interest payments on its obligations and to price volatility. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Municipal Securities Risk. The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water, and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over- the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

Interest Rate Risk. An increase in interest rates could depress the prices of bonds and other fixed income securities in a client's portfolio.

Mutual Funds and ETFs. An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual funds and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event, they sell securities for a profit that cannot be offset by a corresponding loss. Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value "NAV," plus any shareholders' fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

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

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

Derivative Risk. Investing and engaging in derivative instruments or derivative transactions such as options, commodity funds and commodity exchange traded funds may involve different types of risk and possibly greater levels or risks such as those listed below.

Leverage Risk. A derivative instrument or transaction may disproportionately increase an account's exposure to the market for the assets underlying the derivative position and the sensitivity of an account's portfolio to changes in market

prices for those assets.

Counterparty Credit Risk. An account's ability to profit from a derivative contract depends on the ability and willingness of the other party to the contract "counterparty" to perform its obligations under the contract. If the counterparty to an over-the-counter contract fails to perform its obligations, an account may lose the benefit of the contract and may have difficulty reclaiming any collateral that an account may have deposited with the counterparty.

Lack of Correlation. The market value of a derivative position may correlate imperfectly with the market price of the asset underlying the derivative position. If a derivative position is being used to hedge against changes in the value of assets in an account, a lack of price correlation between the derivative position and the hedged asset may result in an account's assets being incompletely hedged or not completely offset price changes in the derivative position.

Illiquidity. Over-the-counter derivative contracts are usually subject to restrictions on transfer, and there is generally no liquid market for these contracts. Although it is often possible to negotiate the termination of an over-the-counter contract or enter into an offsetting contract, a counterparty may be unable or unwilling to terminate a contract with an account, especially during times of market instability or disruption. The markets for many exchange-traded futures, options, and other instruments are quite liquid during normal market conditions, but this liquidity may disappear during times of market instability or disruption.

Less Accurate Valuation. The absence of a liquid market for over-the-counter derivatives increases the likelihood that Castle Wealth Management will be unable to correctly value these interests.

Tax Harvesting Risk. Efficient tax-loss harvesting is an important component of a customized portfolio approach. Tax harvesting is a strategy where an ETF or mutual fund is sold at a taxable loss and replaced with a security whose historical performance and expected future performance are similar, thereby having little impact on the overall strategic allocation, but capturing the tax loss. Because past performance is no indication of future performance, there is potential for the future performance of the replacement position to deviate from that of the initial holding. This type of strategy may also incur an increase in the frequency of trading and amount of transaction costs.

Real Estate Risk. REIT share prices may decline because of adverse developments affecting the real estate industry and real property values. In general, real estate values can be affected by a variety of factors, including supply and demand for properties, the economic health of the country or different regions, and the strength of specific industries that rent properties. Some of our investment strategies require that you maintain a margin account. Clients who purchase securities may pay for them in full or may borrow part of the purchase price from the broker-dealer that holds his/her account. Clients generally use margin to leverage their investments and increase their purchasing power. At the same time, clients who trade securities on margin incur the potential for higher losses. We will discuss the risks of using margin with clients to determine if it is appropriate.

Retirement Rollovers. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and could engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If we recommend that a client roll over their retirement plan assets into an account to be managed by us such a recommendation creates a conflict of interest if we earn an advisory fee on the rolled over assets, which in most cases will be greater than the fees being paid in a 401K plan. When we make the recommendation to rollover retirement accounts, we are acting as a fiduciary where we are required to act in your best interest. No client is under any obligation to rollover retirement plan assets to an account managed by us.

Cybersecurity. The technology systems of the firm and its respective service providers may be vulnerable to inadvertent or deliberate interruption and consequent damage from technical or human sources. In addition to natural catastrophes, service/power outages, and network or telecommunications failures, security breaches and intrusion by unauthorized

persons could result in damage, disruption, and theft of data, including investor information. The firm has implemented cybersecurity procedures meant to address these risks. Nevertheless, given firm's fundamental dependence on technology, a cyber-attack or similar technology disruption could have a material adverse impact on Clients. Additionally, there are inherent limitations in cybersecurity policies and procedures and controls including the possibility that certain risks have not been identified. firm has conducted limited due diligence and risk assessments of third-party providers. However, the firm is not able to control the cybersecurity plans, breach notifications, incident response plans and controls put in place by other services providers and/or the issuers in which the client invests. It is in the client's best interests to monitor all of his or her accounts on a regular basis and stay informed of cybersecurity best practices.

Emerging Technology. From time to time, we can use emerging technologies, such as artificial intelligence ("AI"), as a complement to operational and investment research processes. We can also invest in companies developing or leveraging emerging technology. Emerging technology and AI are wide-ranging terms and include a broad spectrum of technologies and applications, such as machine learning, deep learning, neural networks, and natural language processing, that are quickly evolving. Such emerging technology and AI present unique risks. For example, the automation of tasks previously performed by humans can potentially lead to job displacement and economic disruption. Data privacy concerns arise when AI systems collect and analyze vast amounts of personal data, which can be misused or inadequately protected. Additionally, the rapid development of these technologies often outpaces the creation of appropriate regulations, resulting in ethical challenges such as bias in AI algorithms and the potential for misuse in surveillance, investment decisions or other biases. New security vulnerabilities can also emerge as AI tools are developed, making systems potentially more susceptible to cyberattacks when using emerging AI technologies.

Castle cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Clients need to understand that investment decisions made for their accounts by Castle are subject to various risks. The investment decisions Castle makes will not always be profitable nor can Castle guarantee any level of performance.

The information contained in this brochure cannot disclose every potential risk associated with an investment strategy, nor all of the risks applicable to a particular manager, security, or investment. Risks vary by client according to their investment objectives, guidelines, liquidity needs or risk tolerance and not every strategy or portfolio will be exposed to each of the risks described in this brochure. This list is not intended to be exhaustive of all of the risks associated with investing in strategies or securities that are utilized or recommended by Castle. Rather, it is a general description of the nature and risks of the investment advisory services provided by Castle and the related investments.

Voting Client Securities

As a matter of policy, Castle currently shall not vote proxies for most of our clients. Clients will instruct the custodian, via custodial documentation, to have all proxy material delivered to them. Castle shall assist with this documentation. As a courtesy to the clients and if requested by the client, Castle will assist regarding the proxy.

A small portion of our clients have instructed Castle to vote proxies for clients. In these cases, Castle shall have the fiduciary responsibility for (a) voting in a manner that is in the best interests of each of the clients, and (b) properly dealing with potential conflicts of interest arising from proxy proposals being voted upon.

The policies and procedures of Castle ("the Advisor") for voting proxies received for accounts managed by the Advisor are set forth below and are applicable if:

- The underlying advisory agreement entered into with the client expressly provides that the Advisor shall be responsible to vote proxies received in connection with the client's account; or
- The underlying advisory agreement entered into with the client is silent as to whether or not the Advisor shall be responsible to vote proxies received in connection with the client's account and the Advisor has discretionary authority over investment decisions for the client's account (except in the case of third-party Separate Account

Managers); or

- In the case of an employee benefit plan, the client (or any plan trustee or other fiduciary) has not reserved the power to vote proxies in either the underlying advisory agreement entered with the client or in the client's plan documents.

These Proxy Voting Policies and Procedures are designed to ensure that proxies are voted in an appropriate manner and in the best interest of each individual. Any questions about these policies and procedures should be directed to Christina Worley, CPA/PFS, CFP®, CFA.

Consistent with SEC Rule 206(4)-6, as amended, the Advisor shall take reasonable measures to inform their clients of (1) its proxy voting policies and procedures, and (2) the process or procedures clients must follow to obtain information regarding how the Advisor voted with respect to assets held in their accounts. This information may be provided to clients through the Advisor's Form ADV (Part 2A or Schedule H) disclosure or by separate notice to the client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries).

Christina Worley, CPA/PFS, CFP®, CFA (the "Responsible Party"), shall be designated by the Advisor to make discretionary investment decisions on behalf of the client and will be responsible for approving the voted proxies related to that client's account. The Responsible Party shall assume power to vote on all proxies related to a client's account if any one of the three circumstances set forth earlier regarding proxy voting powers is applicable. The Responsible Party may utilize an outside Proxy voting service to assist and support this service. Currently we utilize Broadridge Proxy voting service to assist us in this work.

Prior to approving a vote, the Responsible Party will verify whether voting power is subject to any limitations or guidelines issued by the client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries).

If an actual or potential conflict is found to exist, written notification of the conflict (the "Conflict Notice") shall be given to the client or the client's designee (or in the case of an employee benefit plan, the plan's trustee or other fiduciary) in sufficient detail and with sufficient time to reasonably inform the client (or in the case of an employee benefit plan, the plan's trustee or other fiduciary) of the actual or potential conflict involved.

The Conflict Notice will either request the client's consent to the Advisor's vote recommendation or may request the client to vote the proxy directly or through another designee of the client. The Conflict Notice and consent thereto may be sent or received, as the case may be by mail, fax, electronic transmission, or any other reliable form of communication that may be recalled, retrieved, produced, or printed in accordance with the recordkeeping policies and procedures of the Advisor. If the client (or in the case of an employee benefit plan, the plan's trustee of other fiduciary) is unreachable or has not affirmatively responded before the response deadline for the matter being voted upon, the Advisor may:

- Engage a Non-Interested Party to independently review the Advisor's vote recommendation if the vote recommendation would fall in favor of the Advisor's interest (or any affiliate of the Advisor) to confirm that the Advisor's vote recommendation is in the best interest of each client under the circumstances;
- Cast its vote as recommended if the vote recommendation would fall against the Advisor's interest (or that of any affiliate of the Advisor) and such vote recommendation is in the best interest of the client under the circumstances; or
- Abstain from voting if such action is determined by the Advisor to be in the best interest of the client under the circumstances.

The Responsible Party will promptly vote proxies received in a manner consistent with the Proxy Voting Policies and Procedures stated above and guidelines (if any) issued by client (or in the case of an employee benefit plan, the plan's trustee, or other fiduciaries if such guidelines are consistent with ERISA).

The Advisor shall keep certain records required by applicable law in connection with its proxy voting activities for clients and shall provide proxy-voting information to clients upon their written or oral request.

Clients may obtain a copy of Castle's complete proxy voting policies and procedures upon request. Clients may also obtain information from Castle about how Castle voted any proxies on behalf of their account(s).

Castle shall conduct documented due diligence to ensure that any voting practices, including those of any third-party providers are meeting the objectives of each individual client.

Form ADV, Part 2A Appendix 1, Item 7

Client Information Provided to Portfolio Managers

Castle will directly provide the portfolio management services for the Wrap Fee Program accounts. As such, Castle receives all information provided by the Client through a formal Needs Analysis and consultation with the Client. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Where Castle utilizes other third-party portfolio managers, Castle shall provide the third-party portfolio managers with your holdings and information related to your account through the regular reporting platform.

Form ADV, Part 2A Appendix 1, Item 8

Client Contact With Portfolio Managers

There are no restrictions placed on Castle's clients' ability to contact and consult with their portfolio manager(s).

Form ADV, Part 2A Appendix 1, Item 9

Additional Information

Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Castle Wealth Management or the integrity of the firm. Castle Wealth Management has no information to report applicable to this Item.

Other Financial Industry Activities and Affiliations

Divine Blalock Martin and Sellari, LLC, Public Accounting Firm

Castle has previously received a significant number of referrals from the Public Accounting Firm "Divine Blalock Martin and Sellari, LLC" (DBMS). Our Investment Committee Member, Gary Sellari, CPA, is the Tax Matters Partner of DBMS, and Mr. Sellari is a minority equity member of Castle and a majority equity member of DBMS. Mr. Sellari of DBMS joins us as a paid consultant weekly for our two-hour Account Review committee meeting, and Quarterly Investment Committee meetings. Mr. Sellari no longer receives a referral fee for new clients' referrals. The DBMS website is dbmscpa.com.

Each company is owned and operated independently from the other. As a result, there is never any obligation on behalf

of the client to use one or both companies at the same time. Castle will no longer be paid for referring new clients to DBMS, but if that should change the fee does not increase the accounting fees paid by the client to the accounting firm. Castle Wealth Management is aware of the applicable Federal and/or State laws, which will be observed, and appropriate disclosures will be made.

Other Professional Referral Sources

Castle's highly customized, integrated approach to wealth management includes working closely with accounting, legal, and insurance firms. We have made arrangements with these and other professional referral sources (Referral Sources) to pay them a referral fee. This in no way increases the fees the client is charged. All applicable Federal and or State laws are observed, and appropriate disclosures are made.

Please refer to Item 14 of Form ADV Part 2A - Client Referrals and Other Compensation for further information.

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

Castle Wealth Management has adopted a Code of Ethics and Professional Responsibility for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics and Professional Responsibility includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of 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 Castle must acknowledge the terms of the Code of Ethics and Professional Responsibility. The firm abides by the CFA Institute's Asset Manager Code of Professional Conduct and employees abide by the CFP® Board's Code of Ethics and Professional Responsibility and the CFA Institute's Code of Ethics & Standards of Professional Conduct.

Castle anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Castle has management authority to effect and will recommend to investment advisory clients or prospective clients the purchase or sale of securities in which Castle, its affiliates and/or clients, directly or indirectly, have a position of interest.

Subject to satisfying this policy and applicable laws, officers, directors and employees of Castle and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Castle clients. Both Codes of Ethics are designed to assure that the personal securities transactions, activities, and interests of the employees of Castle will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Codes, the firm or individuals associated with Castle may buy or sell securities identical to those recommended to customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations present a conflict of interest, Castle has established the following restrictions in order to ensure it meets its fiduciary responsibilities:

1. A member, manager, or employee of Castle shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Castle shall prefer his or her own interest to that of the advisory client. Castle employees may take participation in block trades of large bond positions, normally as an aid to the firm in reaching a round lot for these purchases.
2. Castle maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed and approved on a quarterly basis by the Investment Committee (IC).

3. Castle emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where Castle is granted discretionary authority of the client's account. Usually, clients' written wishes are honored.
4. Castle requires all individuals act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
5. Any individual not in observance of the above may be subject to termination.
6. The CCO is responsible for monitoring the activities of the staff to ensure compliance with the code of ethics.

The firm shall recommend internal cross transactions when there is an objective determination that makes sense from an investment and cost standpoint. We have established policies and procedures to address potential conflicts of interest that could arise when we cause cross-trading. Conflicts may arise when we recommend an internal cross transaction between two or more of our client's asset(s). We may favor one client or group of clients over another. One client could inadvertently advantage over the other client. We have established internal policies and procedures to eliminate or reduce our conflicts. Among other things, the policy prohibits us from benefiting from internal cross transactions and requires that neither participating account is advantaged over the other. Cross trades will not occur in ERISA plan accounts in accordance with ERISA rules and regulations. We shall disclose the trade to the client(s) along with this disclosure.

Castle's clients or prospective clients may request a copy of the firm's Code of Ethics and Professional Responsibility by contacting Christina Worley, CPA/PFS, CFP®, CFA - Managing Member.

Review of Accounts

While the underlying securities within Castle's Portfolio Management client accounts are monitored, these accounts will be formally reviewed by the Account Review Committee. Account Review Committee consists of at least a Partner of the firm, the Financial Planner for the account, and the trader on the account. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. Client portfolios and asset allocations are reviewed by the account review committee at least annually for the smallest accounts, to quarterly for our largest accounts.

The purpose of the Investment Committee is to review and approve or change the ranking of the funds approved for the quarter on the Recommended Funds list.

Clients are currently reviewed during Account Review based on the following schedule:

Annualized Fees	**Reviewed**
$30,000 and up	4 times annually (Titanium)
$22,500-$30,000	4 times annually (Platinum)
$15,000-$22,500	3 times annually (Gold)
$7,500-$15,000	2 times annually (Silver)
<less than $7,500	1 time annually (Bronze)

Regular Reports Provided to Clients

Portfolio Management

In addition to the monthly statements and confirmations of transactions Portfolio Management clients receive from their broker-dealer, Castle will provide quarterly reports to clients consisting of internal rates of return (time-weighted from

inception, year to date, and previous quarter), positions, balances, additions/withdrawals, realized and unrealized gains and losses, cost-basis information, and interest/dividend information.

Money Manager Search and Monitoring

These client accounts will receive reports from Castle, as contracted, upon inception of the client relationship.

Consulting Service

Consulting clients receive reports as agreed upon at the inception of the advisory relationship.

Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Castle works closely with accounting, legal and insurance professionals in a fully integrated management approach to all portfolios. As such, in the event a professional promoter endorses Castle by referring prospective clients to Castle, we shall pay a percentage of the advisory fee to the promoter. We will not charge clients referred to us any fees or costs higher than our standard fee schedule offered to all of our clients. We will enter into a written agreement with all promoters and provide the referred clients with the details of the payment percentage. Castle does not pay any cash or non-cash compensation for testimonials from clients.

If the client is introduced to Castle by a referral source, the ADV Brochure and any required disclosure will be provided to the client.

Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Castle's financial condition. Castle has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject o f a bankruptcy proceeding. Since Castle does not collect fees in advance, more than $1,200 per client, six months or more in advance, audited financial statements are not required at this time.