

# PILLAR WEALTH MANAGEMENT, LLC. CLIENT BROCHURE

*This brochure provides information about the qualifications and business practices of Pillar Wealth Management, LLC. . If you have any questions about the contents of this brochure, please contact us at (925) 407-0320 or by email at: PWM@PillarWM.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Pillar Wealth Management, LLC. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Pillar Wealth Management, LLC.'s CRD number is: 147837*

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*Registration does not imply a certain level of skill or training.*

Version Date: 02/13/2020

## Item 2: Material Changes

The change made to this Brochure since the last Annual Amendment was filed on January 4, 2019 is as follows: Item 5A has been amended as follows: For new clients, as of January 2, 2020, the cumulative account minimum is \$5,000,000; the minimum annual fee is \$15,000; Mr. Ashoo's hourly rate is \$875 and Mr. Snyder's hour rate is \$675. Item 4 has been updated to report the firm's regulatory assets under management as of December 31, 2019. Item 12 has been updated to now include Charles Schwab & Co., Inc. as another custodial relationship for the firm.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

This firm has been in business since September 8, 2008, and the principal owners are Haitham E. Ashoo and Christopher G. Snyder.

### B. Types of Advisory Services

Pillar Wealth Management, LLC. (hereinafter "PWM") offers the following services to advisory clients:

#### *Investment Supervisory Services*

PWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client.

Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset selection
- Regular portfolio monitoring
- Asset allocation
- Risk tolerance

PWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction.

#### *Consulting (Stand Alone)*

PWM may also offer a more limited consulting service to their clients which may include business planning, retirement planning, real estate, etc. on a stand-alone fee basis.

#### *Financial Planning*

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in the Financial Planning Agreement.

#### *Selection of Other Advisors*

PWM does not direct clients to third party money managers.

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

PWM limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, third party money managers, REITs, insurance products including annuities, private placements, and government securities. PWM may use other securities as well to help diversify a portfolio when applicable.

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

PWM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent PWM from properly servicing the client account, or if the restrictions would require PWM to deviate from its standard suite of services, PWM reserves the right to end the relationship.

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

PWM does not participate in any wrap fee programs.

### **E. Amounts Under Management**

PWM has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$161,917,341	\$0.00	12/31/2019

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
All Assets Under Management	0.27% - 1.60%

There is an annual minimum fee of \$15,000. These fees are negotiable and the final fee schedule is attached to the Investment Advisory Contract. Fees are paid quarterly in advance based upon the market value of the assets on the last business day of the previous quarter. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

PWM annual investment advisory fee shall include investment advisory services, and **does not** include financial planning and consulting services.

PWM requires a minimum balance of \$ 5,000,000 and an annual minimum fee of \$15,000. PWM in its sole discretion may aggregate client accounts for the purpose of achieving the minimum account size. PWM in its sole discretion may reduce its minimum balance requirement or charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related account, account composition negotiations with client, etc.). Generally the advisory fee will not be adjusted for additions or withdrawals made during the quarter. This will have the effect of increasing the fee if funds are added and decreasing the fee if funds are withdrawn. However, PWM may adjust the quarterly advisory fee on a prorated basis for additions or withdrawals in excess of \$100,000.

#### *Consulting (Stand Alone)*

Depending upon the complexity of the situation and the needs of the client, consulting fees general range from \$2,500.00 and \$25,000.00 on a fixed fee basis, and \$875 for Mr. Ashoo and \$675 for Mr. Snyder for an hourly rate basis. PWM requires a minimum fee of \$2,500. A portion of the fee may be paid in advance, but never more than six months in advance, with the remainder due upon completion of the project. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable.

## ***Financial Planning Fees***

### ***Fixed Fees***

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$500.00 and \$25,000.00. PWM requires a minimum fee of \$2,500. A portion of the fee may be paid in advance, but never more than six months in advance, with the remainder due upon completion of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached to the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

### ***Hourly Fees***

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is \$875.00 for Mr. Ashoo and \$675.00 for Mr. Snyder. PWM requires a minimum fee of \$2,500. The fees are negotiable and the final fee schedule will be attached to the Financial Planning Agreement. A portion of the fee may be paid in advance, but never more than six months in advance, with the remainder due upon completion of the project. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance.

### ***Consulting (Stand Alone)***

Consulting fees are paid via check in advance, but never more than six months in advance, with the remainder due upon completion of the project. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

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

Hourly Financial Planning fees are paid via check in advance, but never more than six months in advance, with the remainder due upon completion of the project. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

Fixed Financial Planning fees are paid via check in advance, but never more than six months in advance, with the remainder due upon completion of the project. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.



### **C. Clients Are Responsible For Third Party Fees**

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

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

PWM collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check or deposit back into client's account.

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

Neither PWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

PWM does not charge clients Performance-Based Fees.

## **Item 7: Types of Clients**

PWM generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

### ***Minimum Account Size***

There is an account minimum, \$5,000,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

## A. Methods of Analysis and Investment Strategies

### *Methods of Analysis*

PWM's methods of analysis include charting analysis, fundamental analysis and cyclical analysis.

**Charting analysis** involves the use of patterns in performance charts. PWM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

**Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

### *Investment Strategies*

PWM uses long term trading, short term trading and margin transactions strategies.

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

## B. Material Risks Involved

### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

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

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold : 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

### *Investment Strategies*

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading and margin transactions generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

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

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

PWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize margin transactions which generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

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

## **Item 9: Disciplinary Information**

A Settlement Agreement has been entered into between PWM and The Commissioner of Business Oversight, State of California, as of June 30, 2016 in relation to PWM not submitting the required notice filings of the firm since 2008. PWM has paid a fine and submitted the required notice filing as well as updated the Form ADV for this matter. Any questions should be directed to Haitham Ashoo at (925) 407-0320.

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

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

Neither PWM nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

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

Neither PWM nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

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

Neither PWM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

PWM does not direct clients to third party money managers.

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

#### **A. Code of Ethics**

PWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

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

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

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

From time to time, representatives of PWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of PWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. PWM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

From time to time, representatives of PWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of PWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients.

### **Item 12: Brokerage Practices**

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

The Custodian, Fidelity Brokerage Services LLC and Charles Schwab & Co., Inc., were chosen based on their fees, services and access to equities, bonds, mutual funds and ETFs. PWM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

### **1. *Research and Other Soft-Dollar Benefits***

PWM may receive from *Fidelity or Schwab*, without cost (and/or at a discount) support services and/or products, certain of which assist the Registrant to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Registrant may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations.

Registrant's clients do not pay more for investment transactions effected and/or assets maintained at *Fidelity or Schwab* as result of this arrangement. There is no corresponding commitment made by the Registrant to *Fidelity or Schwab*, or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

### **2. *Brokerage for Client Referrals***

PWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

PWM does not allow clients to direct brokerage.

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

PWM maintains the ability to block trade purchases across accounts. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

## **Item 13: Reviews of Accounts**

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

Managing Member Haitham E. Ashoo is responsible for oversight of client accounts and will review client accounts on an annual basis. The nature of the review is to determine if the client account is still in line with the client's stated objectives.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations.

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

Each client will receive a monthly written statement from their broker dealer.

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

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

PWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to PWM clients.

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

PWM has engaged four firms who provide technology platforms designed to help prospective investors locate Advisors who may be near them geographically or otherwise meet other criteria selected by individual. PWM pays each firm for this service. The fees paid to these firms do not affect the fees clients pay to PWM, should the client engage PWM as their Advisor. In each instance, a written agreement exists between PWM and the firm.

## **Item 15: Custody**

PWM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the Custodian.

## **Item 16: Investment Discretion**

For those clients' accounts where PWM provides ongoing supervision, the client has given PWM written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client

provides PWM discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

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

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

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

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

PWM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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

Neither PWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

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

PWM has not been the subject of a bankruptcy petition in the last ten years.

*This brochure supplement provides information about Christopher G. Snyder that supplements the Pillar Wealth Management, LLC. brochure. You should have received a copy of that brochure. Please contact Haitham E. Ashoo, Managing Member if you did not receive Pillar Wealth Management, LLC.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Pillar Wealth Management, LLC.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Christopher G. Snyder**

Personal CRD Number: 1876547

Investment Adviser Representative

Pillar Wealth Management, LLC.  
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(925) 407-0320  
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www.PillarWM.com

UPDATED: 02/13/2020



## **Item 2: Educational Background and Business Experience**

**Name:** Christopher G. Snyder

**Born:** 1966

### **Education Background and Professional Designations:**

#### **Education:**

Bachelor of Science in Finance, Minor in Communications & Economics  
St. Mary's College of California - 1988

#### **Business Background:**

2008 - Present

Member  
Pillar Wealth Management, LLC.

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## **Item 4: Other Business Activities**

Christopher G. Snyder is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Item 5: Additional Compensation**

Other than salary, annual bonuses, regular bonuses, Christopher G. Snyder does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Pillar Wealth Management, LLC.

## **Item 6: Supervision**

As a co-owner/representative of Pillar Wealth Management, LLC., Haitham E. Ashoo works closely with Christopher G. Snyder, and advice provided to clients is reviewed by either member prior to implementation. Christopher G. Snyder's contact information is on the cover page of this disclosure document.

*This brochure supplement provides information about Haitham E. Ashoo that supplements the Pillar Wealth Management, LLC. brochure. You should have received a copy of that brochure. Please contact Haitham E. Ashoo, Managing Member if you did not receive Pillar Wealth Management, LLC.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Pillar Wealth Management, LLC.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Haitham E. Ashoo**

Personal CRD Number: 1741558

Investment Adviser Representative

Pillar Wealth Management, LLC.  
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[www.PillarWM.com](http://www.PillarWM.com)

UPDATED: 02/13/2020

## **Item 2: Educational Background and Business Experience**

**Name:** Haitham E. Ashoo

**Born:** 1964

### **Education Background and Professional Designations:**

#### **Education:**

Bachelor of Science in Business Administration  
California State University (Sacramento) - 1987

#### **Business Background:**

2008 – Present                      Managing Member & Chief Compliance Officer  
Pillar Wealth Management, LLC.

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## **Item 4: Other Business Activities**

Haitham E. Ashoo is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Item 5: Additional Compensation**

Other than salary, annual bonuses, regular bonuses, Haitham E. Ashoo does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Pillar Wealth Management, LLC.

## **Item 6: Supervision**

As a co-owner/representative of Pillar Wealth Management, LLC., Haitham E. Ashoo works closely with Christopher G. Snyder, and advice provided to clients is reviewed by either member prior to implementation. Haitham E. Ashoo's contact information is on the cover page of this disclosure document.