# Item 1: Cover Page FORM ADV PART 2A – FIRM BROCHURE

March 2024



Investment Advisory Firm (CRD# 147837)

Pillar Wealth Management LLC 1255 Treat Boulevard, Suite 300 Walnut Creek, CA 94597 (925) 407-0320 pwm@pillarwm.com www.pillarwm.com

This brochure provides information about the business practices and qualifications of Pillar Wealth Management, LLC. Any questions regarding the contents of this brochure should contact Mr. Haitham E. Ashoo 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 <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>

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

# **Item 2: Material Changes**

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## **Item 4: Advisory Business**

Pillar Wealth Management, LLC ("PWM") is an SEC registered investment adviser. Mr. Haitham E. Ashoo is the Chief Compliance Officer (CCO) and Managing Member of Pillar Wealth Management, LLC, and as of FYE2023, PWM managed \$201,167,860.58 on a discretionary basis.

#### **Financial Planning**

At Pillar Wealth Management we take the time to listen and learn about each client's specific financial circumstances. We do this to get a better understanding of each client's current financial situation and where they aspire to be in their financial future. With a thorough understanding of their current financial condition, Pillar Wealth Management, in partnership with each client, uses this information as the cornerstone for developing a thoughtful and comprehensive investment strategy within a broader financial plan. That plan, appropriately adjusted along the way, forms the roadmap for each client in which we follow in an effort to achieve their long term financial goals.

Pillar Wealth Management begins by reviewing each client's current assets, liabilities, income, expenses, and risk tolerance. We then look to the client's future income needs and expenses. It is at this point that we start to create and develop the financial plan. The information uncovered in the discovery process, such as risk tolerance and past financial behaviors and previous financial decisions, helps us at Pillar Wealth Management to determine a target asset allocation that is appropriate for each client's goals and risk tolerance. Once the appropriate asset mix is determined and agreed we move to implement that plan. A client's thorough understanding of the plan, the potential risks involved, and the need to adjust the plan as financial circumstances change are just a few of the factors that will contribute to the financial plans success.

Capital markets are complex and volatile and we believe educated investors increase their probability of achieving their financial goals when they stay focused on their specific financial plan. Pillar Wealth Management encourages clients to have an open dialogue as it relates to financial planning, and to review the financial plan no less than annually and advise our clients to contact us if there is a material change to their financial circumstances and/or a change in the information they have provided Pillar Wealth Management in general. This process helps clients stay focused on their long-term objectives even as they encounter periods of short term uncertainty during market volatility. Financial plans are dynamic and will change over time based on changes in individual client circumstances.

#### **Investment Management Services**

Pillar Wealth Management assists clients with the management of their investments on a discretionary basis with the client's consent. Each accounts asset allocation and target asset mix is guided by a client's objectives, investment experience, investment objectives, goals, time horizon, liquidity needs, risk tolerance, tax circumstances, and other factors. Although we tend to favor the use of Mutual Funds and ETFs, Pillar Wealth Management's investment decisions are not limited to any specific security or industry and may include investment advice regarding the following types of securities and investment vehicles:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Domestic Equities
- Corporate Bonds
- Certificates of Deposit
- Municipal Bonds

- U.S. Treasuries
- REITs
- Commodities
- Preferred Stocks

Because the above investments involve varying degrees of risk, they will only be utilized or recommended when consistent with a client's stated investment goals, risk tolerance, liquidity needs, and tax circumstances. Importantly, we consider the riskiness of any single investment within the broader context of a client's overall portfolio in addition to the risk characteristics of any individual security.

Pillar Wealth Management creates custom portfolios for its clients as to align with each clients risk tolerance, investment objectives and goals. Once Pillar Wealth Management constructs a customized investment portfolio for a client, we monitor each client's investment strategy and performance on an ongoing basis, rebalancing the portfolio as we deem appropriate. If a client's financial circumstance(s) and/or investment objectives change they are expected to notify Pillar Wealth Management immediately, this is to ensure the client's portfolio stays in line with their risk tolerance and goals.

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

Pillar Wealth Management receives compensation for its investment advisory and management services based on the assets under management (aum) in which we oversee. Pillar Wealth Management reserves the right to negotiate fees and compensation with its clients. Unless negotiated otherwise, we have a minimum household balance of \$5,000,000.00 in aum and an annual minimum fee of \$15,000.00. Negotiated fees between Pillar Wealth Management and the client will supersede Pillar Wealth Management's existing fee structure. The Pillar Wealth Management investment advisory contract can be terminated by the client within five (5) business days of the signing of the investment advisory contract and the client will not be responsible for advisory fees incurred during that time. Please review the fee and compensation information below. Lower fees for comparable services may be available from other sources.

#### **Financial Planning Fees**

Pillar Wealth Management offers financial planning services as part of its comprehensive investment management service. (See Investment "Management Fees" below)

#### **Investment Management Fee Structure**

Pillar Wealth Management's advisory fee is billed quarterly in advance and based on the previous quarters ending account balance. PWM's fees are negotiated and not to exceed 1.6% of the assets being managed.

#### **Fee Billing**

PWM's advisory fees are billed quarterly in advance based on the assets under management on the last day of the previous quarter of the accounts managed by PWM. PWM will invoice clients via the custodian and the fee will be based on the aggregated amount of all client accounts managed by PWM. Clients have the option of paying the fee directly to PWM by check, or having it pulled directly from their account(s) being managed. If payment is not received by the end of the month in which the invoice is sent, the fee due will be deducted directly from the client's account.

When determining a refund for fees paid in advance, the number of remaining days in the quarter will be used to determine the amount of the refund. For example, if you paid \$500 in advance for the quarter and there are 20 days remaining in the quarter (assuming a 90-day quarter), you will receive a refund of \$111.11

 $($500/90 = $5.55 \times 20)$ . Fees will be returned within fourteen days to the client via check or deposit back into client's account.

#### **Other Fees and Expenses**

- PWM does not charge additional fees other than the fees listed above and/or negotiated.
- PWM does not receive or share any additional fees or expenses incurred by advisory clients.
- PWM clients will incur brokerage and other transaction costs by the custodian. PWM does not receive these fees nor does it share in these fees; see Item 12: Brokerage Practices, for additional information.

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

PWM does not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in client's advisory account.

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

PWM's clients include, but are not limited to, individuals and High-Net-Worth Individuals.

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

PWM may use the following methods of analysis when providing investment advice to clients:

**Technical Analysis** -Technical Analysis involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks. The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** - Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Cyclical Analysis** - Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Quantitative Analysis** - Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Qualitative Analysis** - Qualitative analysis is a securities analysis that uses subjective judgment based on unquantifiable information, such as management expertise, industry cycles, strength of research and development, and labor relations. Qualitative analysis contrasts with quantitative analysis, which focuses on numbers that can be found on reports such as balance sheets. The two techniques, however, will often be used together in order to examine a company's operations and evaluate its potential as an investment opportunity.

#### **Investment Strategies**

PWM believes that asset allocation across diverse investment is the key to long term success in reaching client objectives. We primarily invest client assets in mutual funds and exchange-traded funds ("ETFs) to offer both diversification and overall lower expenses. PWM may consider and invest in funds that may have higher fees and expenses if there is a compelling reason for the benefit of the client.

#### **Risks of Loss**

#### Mutual Funds, Exchange Traded Funds (ETFs) & Actively Managed Investments

An investments in a mutual funds and ETFs involve risk, including the loss of principal. Investors are subject to the risks that stem 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 these types of investments 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). Each share 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. 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 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 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 50,000 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. The same risks of illiquidity also apply to individual securities and thus can affect actively managed portfolios.

#### **Market Risks**

All securities, particularly individual equity and debt securities are subject to market volatility, economic factors and certain other market risks. The success of a particular investment may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that PWM will be able to predict those price movements accurately.

Investing in capital markets and securities involves risk of loss that clients should be prepared to bear.

• Mutual Funds - Market risk, Management risk, Tracking risk.

Mutual Funds are investment vehicles that contain/hold other investments and may be limited by their investment strategies, and a Mutual Fund's price may fluctuate based on underlying market conditions, and the pricing of the underlying securities.

#### • Exchange Traded Funds (ETFs) - Market risk, Management risk, Tracking risk.

ETF's are investment vehicles that contain/hold other investments allowing them to be traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of an ETF can be lower from that of the underlying securities, that the ETF may be limited by its investment strategy, and that an ETF's price may fluctuate throughout the day.

#### Domestic Equities - Market risk, Company risk, Liquidity risk.

Domestic Equities are typically traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a domestic equity may fluctuate throughout the day.

#### • Foreign Equities - Currency risk, Foreign Market risk, Company risk.

Foreign Equities are typically traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a foreign equity may fluctuate throughout the day and overnight, depending on the exchange in which it is traded.

#### Corporate Bonds - Interest Rate risk, Issuer risk, Liquidity risk.

Corporate bonds are not traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a Corporate bond may fluctuate by the interest rate environment, and credit rating of the issuer.

#### Commercial Paper - Credit risk, Fixed Income risk, Interest Rate risk.

Commercial paper is not traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a Commercial paper may fluctuate by the lending/overnight rate environment, and credit rating of the issuer.

#### Certificates of Deposit - Fixed Income risk, Interest Rate risk, Liquidity risk.

Certificates of deposit are not traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a certificate of deposit may fluctuate by the interest rate environment, the issuing bank and liquidity risk if sold on the secondary market.

#### Municipal Bonds - Fixed Income risk, Interest Rate risk, Credit risk.

Municipal bonds are not traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a municipal bonds may fluctuate by the interest rate environment, the issuing municipality credit rating and taxing authority.

#### • U.S. Treasuries - Fixed Income risk, Interest Rate risk, Credit risk.

U.S. Treasuries are not traded on an exchange as they are issued by the U.S. Government and may be subject to brokerage trading costs, cost efficiency, the market price of a U.S. Treasuries may fluctuate by the interest rate environment, and U.S. currency strength/weakness.

#### • REITs - Issuer risk, Liquidity risk, Management risk.

REITs are investment vehicles that contain/hold real estate investments allowing them to be traded on an exchange. They may be subject to brokerage trading costs, cost efficiency, the market price of a REIT can be lower from that of the underlying real estate, and a REITs price may fluctuate throughout the day.

#### Commodities - Commodity risk, Interest Rate risk, Liquidity risk.

Factors that can influence commodity prices include politics, seasons, weather, technology, and market conditions.

## **Item 9: Disciplinary Information**

PWM and/or its representatives have not been the subject of any disciplinary actions as it relates to clients and does not have any legal of disciplinary information to disclose at this time.

## Item 10: Other Financial Industry Activities and Affiliations

Neither PWM, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither PWM, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

PWM has no other relationship or arrangement with a related person that is material to its advisory business.

## Item 11: Code of Ethics, Client Transactions and Personal Trading

#### **Code of Ethics**

The employees of PWM have committed to a Code of Ethics that is available for review and will be provided to clients and prospective clients upon request. PWM has set forth guidelines for professional standards of conduct for its associated persons, the goal of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines. Associated persons are also required to report any violations of the Firm's Code of Ethics. Additionally, PWM maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about clients or their account holdings by PWM or any associated person.

#### **Participation or Interest in Client Transactions**

Neither PWM nor any of our associated persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

#### **Personal Trading**

Our firm or persons associated with our firm may buy or sell securities for clients at the same time we or persons associated with our firm buy or sell such securities for our own account. A conflict of interest exists in such cases because we have the ability to trade ahead of clients and potentially receive more favorable prices than clients will receive. To mitigate this conflict of interest, it is our policy that we shall not have priority over clients account in the purchase or sale of securities.

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

#### **Selecting Brokerage Firms**

PWM can work with multiple custodians and will often recommend clients work with the qualified custodian that they feel most comfortable with (ie: Fidelity and/or Schwab). PWM does not receive fees or commissions from these arrangements. PWM will recommend a custodian based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

#### **Best Execution**

We believe that the above custodians provide the best services at competitive rates. The reasonableness of commission rates is based on several factors, including the broker's ability to provide professional services, execution, the broker's reputation, experience and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in transactions. Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered. Each of the above mentioned custodians has a history of best execution performance that is well documented in various publications and testing results.

#### **Order Aggregation**

PWM client accounts are customized to the client, and therefore, PWM does not aggregate transactions for multiple client accounts.

#### **Directed Brokerage**

In limited circumstances, and at our discretion, some clients may instruct PWM to use one or more particular brokers for the transactions in their accounts. If clients choose to direct our firm to use a particular broker, clients should understand that this might prevent from effectively negotiating brokerage commissions on clients behalf. This practice may also prevent PWM from obtaining a favorable price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that clients will obtain through a particular broker are adequately favorable in comparison to those that we would otherwise obtain for clients.

#### Item 13: Review of Accounts

#### **Periodic Reviews**

Client accounts and financial situations are reviewed and updated by PWM as deemed necessary by PWM. Reviews of the client's financial situation are ongoing and are done quarterly, semiannually and/or annually. Portfolio and financial plan reviews are and in most cases predetermined in advance with PWM clients. Reviews may also be prompted by the client and/or PWM at any given time.

#### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

#### **Regular Reports**

PWM clients receive monthly and/or semi-annual portfolio performance statements from the custodian holding client assets. In addition, clients also receive transaction confirmations from the account custodian being used.

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

PWM does not directly or indirectly compensate any persons for client referrals.

## **Item 15: Custody**

We may directly debit clients account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from clients account(s) causes our firm to exercise limited custody over client funds or securities. We do not have physical custody of any client funds and/or securities. Client funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. Clients will receive account statements from the independent, qualified custodian(s) holding client's funds and securities at least quarterly. The account statements from client's custodian(s) will indicate the amount of our advisory fees deducted from clients account(s) each billing period. Clients should carefully review account statements for accuracy. If clients have a question regarding account statements or if clients did not receive a statement from the custodian, please contact PWM at the contact information provided on the front page of this brochure.

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

#### **Discretionary Authority for Trading**

PWM can and will accept discretionary trading authority to manage investment accounts on behalf of PWM clients. PWM has the authority to determine, without obtaining specific client consent, the investments to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority allows PWM to place trades in clients' accounts on their behalf so that we may promptly implement the investment policy that clients have approved in writing. Discretionary authority is granted via a limited power of attorney executed by the client. Clients have a right to decline to implement any advice provided by PWM on a non-discretionary basis. The client approves the custodian to be used to house assets/investments and the commission rates paid to the custodian. PWM does not receive any portion of the transaction fees and/or commissions paid by the client to the custodian on any given trade/transaction.

## **Item 17: Voting Client Securities**

#### **Proxy Votes**

PWM can and will assist clients with voting proxies if the client chooses. If a client owns shares of investments, clients are shareholders and can exercise their right to vote on proxies as a shareholder. In most cases, clients will receive proxy materials directly from the account custodian. However, in the event we were to receive any

written or electronic proxy materials, the materials would be forwarded directly to clients by mail, unless clients have authorized the firm to contact clients by electronic mail, in which case, we would forward any electronic solicitation to vote proxies. Clients that would like assistance from PWM in understanding the material within the proxy and/or would like assistance with the voting process can contact PWM by phone or by email using the contact information on the front of this brochure.

#### **Class Action Lawsuits**

PWM does not determine if securities held by clients are the subject of a class action lawsuit or whether clients are eligible to participate in said class action settlement or litigation nor does PWM initiate or participate in litigation to recover damages on a client's behalf for damages as a result of said actions, misconduct, or negligence of said party.

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

#### **Financial Condition**

PWM does not have any financial situations that will result in PWM from meeting contractual commitments to clients. A balance sheet is not required to be provided as PWM does not have custody of client assets.

## Part 2B of Form ADV: Brochure Supplements

Supplement 1: Mr. Christopher G. Snyder

Supplement 2: Mr. Haitham E. Ashoo

#### **Brochure Supplements**

**Item 1: Cover Page** 

Mr. Christopher G. Snyder Mr. Haitham E. Ashoo

Pillar Wealth Management, LLC. 1255 Treat Boulevard, Suite 300 Walnut Creek, California, 94597

March 2024

This brochure supplement provides information about the above listed supervised employees that supplements the Pillar Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Haitham E. Ashoo at (925) 407-0320; if you did not receive this brochure or if you have any questions about the contents of this supplement.

#### **Supplement 1:**

#### Item 2: Name, Education and Business Experience

Name: Mr. Christopher G. Snyder

Born: 1966

#### **Education, Certifications & Industry Exams Passed:**

St. Mary's College of California | BS in Finance, with a minor in Communications & Economics | 1988

Series 65 | Uniform Investment Adviser Law Examination

#### **Financial Services Background:**

Pillar Wealth Management, LLC | Co-Owner & Investment Advisor Representative | Walnut Creek, CA | 09/2009 - Present

Pillar Financial Services, Inc. | Co-Owner & Investment Advisor Representative | Walnut Creek, CA | 08/1988 – 09/2009

#### **Item 3: Disciplinary Information**

As an Investment Advisor Representative, you are required to disclose all material fact regarding any legal or disciplinary events that would be material in your evaluation.

Mr. Christopher G. Snyder has never personally been the subject of an administrative or self-regulatory organization proceeding or any other hearing or formal adjudication regarding a professional attainment, designation or license.

For more information about Mr. Christopher G. Snyder, please visit FINRA's Broker Check at <a href="https://www.finra.org/brokercheck">www.finra.org/brokercheck</a> and/or the Securities and Exchange Commission's Investment Advisor search at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

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

Mr. Christopher G. Snyder is not actively engaged in any other investment advisory related business or occupation at this time (other than Pillar Wealth Management, LLC).

#### **Item 5: Additional Compensation**

Mr. Christopher G. Snyder does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services other than Pillar Wealth Management, LLC.

#### Item 6: Supervision

Mr. Christopher G. Snyder is supervised by Mr. Haitham E. Ashoo, the Managing Member and Chief Compliance Officer (CCO) of Pillar Wealth Management, Inc. His contact information is on the cover page of this disclosure document. Mr. Christopher G. Snyder adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, the firm's compliance manual (including the code of ethics), and appropriate securities regulatory requirements.

#### **Supplement 2:**

#### Item 2: Name, Educational and Business Experience

Mr. Haitham E. Ashoo

Born: 1964

#### **Education, Certifications & Industry Exams Passed:**

St. Mary's College of California | BS in Finance, with a minor in Communications & Economics | 1988

Series 65 | Uniform Investment Adviser Law Examination

#### **Financial Services Background:**

Pillar Wealth Management, LLC | Co-Owner & Investment Advisor Representative | Walnut Creek, CA | 09/2009 – Present

Pillar Financial Services, Inc. | Co-Owner & Investment Advisor Representative | Walnut Creek, CA | 08/1988 – 09/2009

#### **Item 3: Disciplinary Information**

As an Investment Advisor Representative you are required to disclose all material fact regarding any legal or disciplinary events that would be material in your evaluation.

Mr. Haitham E. Ashoo has never been the subject of an administrative or self-regulatory organization proceeding; or any other hearing or formal adjudication regarding a professional attainment, designation or license.

For more information about Mr. Haitham E. Ashoo, please visit FINRA's Broker Check at www.finra.org/brokercheckand/or the SEC's Investment Advisor Search at www.adviserinfo.sec.gov.

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

Mr. Haitham E. Ashoo is not actively engaged in any other investment advisory - related business or occupation at this time (other than Pillar Wealth Management, LLC).

Mr. Haitham E. Ashoo has an active insurance license.

#### **Item 5: Additional Compensation**

Mr. Haitham E. Ashoo does not receive any economic benefit from any person, company, or organization in the investment advisory industry, outside of Pillar Wealth Management, LLC.

Mr. Haitham E. Ashoo has an active insurance license that allows him to discuss/offer/sell insurance products for compensation.

#### **Item 6: Supervision**

As the Chief Compliance Officer (CCO) of Pillar Wealth Management LLC, Mr. Haitham E. Ashoo is responsible for the supervision of all investment adviser representatives of Pillar Wealth Management LLC. His contact information is on the cover page of this disclosure document. Mr. Haitham E. Ashoo adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, the firms compliance manual, including the code of ethics, and applicable securities regulatory requirements.