

# Smarter Way Wealth, LLC

## FIRM BROCHURE

Date of this Brochure: 4/29/2026

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This brochure provides information about the qualifications and business practices of Smarter Way Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (646) 418-2867 or [compliance@smarterwaywealth.com](mailto:compliance@smarterwaywealth.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.

*Smarter Way Wealth, LLC is a state-registered investment adviser. Registration does not imply a certain level of skill or training.*

Additional information about Smarter Way Wealth, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search for information by using CRD #342140.

## Item 2 — Material Changes

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This is the initial filing of Form ADV Part 2A for Smarter Way Wealth, LLC. As such, there are no material changes to report. In the future, this section will describe material changes since the last annual amendment. Clients will receive a summary of material changes or a complete updated brochure within 120 days of the end of our fiscal year.

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## Item 4 — Advisory Business

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### A. Description of the Advisory Firm

Smarter Way Wealth, LLC is a Connecticut limited liability company formed March 10, 2026, registered with the Connecticut Department of Banking. Principal owner and Managing Member: David Van Osdol, CFA, CFP®.

### B. Types of Advisory Services

- **Financial Planning:** personalized plans (retirement, education, tax, estate, cash flow) using institutional-quality software; reviewed and updated on an ongoing basis.
- **Investment Recommendations:** non-discretionary, tailored to each client's situation. May include ETFs, no-load mutual funds, and alternatives. Does not generally recommend individual securities as part of portfolio construction. Clients may request opinions on individual holdings — guidance provided subject to the same fiduciary standard. Clients make all final decisions.
- **Ongoing Advisory Relationship:** continuous access for questions, plan updates, and investment guidance.

### C. Client-Tailored Services

All services are tailored to individual client needs. Clients may impose reasonable investment restrictions.

### D. Wrap Fee Programs

The Firm does not participate in or sponsor wrap fee programs.

### E. Assets Under Management

\$0 as of the date of this brochure. Operations have not yet commenced.

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## Item 5 — Fees and Compensation

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### A. Fee Schedule

Flat fee of \$100 per month. The fee does not vary by assets under management or account performance. No asset-based, performance-based, commission, or wrap fees.

### B. Billing Method

Monthly in arrears via ACH debit.

### C. Other Fees and Expenses

Clients may incur: fund expense ratios (ETFs, mutual funds); brokerage and transaction costs charged by their broker-dealer; alternative investment fees (management, performance, platform fees). All such costs are separate from and in addition to the advisory fee.

### D. Prepayment

Prepayment is not required or accepted.

### E. Termination and Refund

Either party may terminate with written notice. Fees accrued through the termination date are due. No refund is provided (arrears billing). Partial months are not prorated; the full monthly fee applies for any month in which services are rendered.

### F. Compensation for Sale of Securities

The Firm does not sell securities and does not receive commissions.

## Item 6 — Performance-Based Fees

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Smarter Way Wealth, LLC does not charge performance-based fees. The flat monthly fee is the same regardless of account performance.

## Item 7 — Types of Clients

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Individual clients. Minimum of \$250,000 in investable assets (liquid financial accounts; excludes real estate, business interests, and illiquid holdings). The Firm may waive or reduce the minimum at its sole discretion.

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

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### A. Methods of Analysis

Goals-based approach considering the client's complete financial picture. Factors considered include: asset allocation, fund selection (expense ratios, tracking error, tax efficiency), macroeconomic conditions, and tax implications.

### B. Investment Strategies

- ETFs (passive and active) across equity, fixed income, and other asset classes
- No-load mutual funds
- **Cryptocurrency-related ETFs:** where appropriate, small allocation (generally 2–5%) to SEC-registered ETFs providing digital asset exposure
- **Alternative Investment Platforms:** the Firm may refer clients to third-party platforms (crowdfunding, art-investment, specialty marketplaces) for the client's own research and evaluation. Referrals are educational, not recommendations to purchase specific offerings. The Firm does not conduct due diligence on or monitor specific platform offerings. The Firm receives no compensation from any platform.

Core strategy: diversified portfolios using ETFs, no-load mutual funds, and where appropriate, alternatives. The Firm does not generally recommend individual stocks or bonds as part of portfolio construction. Clients may request opinions on holdings they own or are considering; the Firm may provide guidance (hold, reduce, liquidate) subject to the same fiduciary standard.

The Firm does not employ margin, short selling, or options strategies. All recommendations are non-discretionary.

### C. Alternative Investments — Additional Disclosures

Certain alternative investments require accredited investor status (SEC Regulation D):

- **Income:** \$200,000 individual / \$300,000 joint for two most recent years with reasonable expectation of the same
- **Net worth:** greater than \$1,000,000 excluding primary residence
- **Professional certifications:** Series 7, 65, 82, CFA, etc.

The Firm verifies eligibility before recommending alternative investments. The Firm does not recommend investments requiring qualified purchaser status (\$5,000,000+).

### D. Risk of Loss

Investing involves risk, including potential loss of principal. Specific risks include:

- **Market risk:** broad market movements, economic conditions, geopolitical events
- **Interest rate risk:** adverse effect on fixed-income investments
- **Inflation risk:** returns may not keep pace with inflation
- **Fund-specific risk:** management risk, tracking error
- **Cryptocurrency-related risk:** extreme volatility, regulatory uncertainty, wider spreads, tracking error, limited liquidity. Allocations kept small (2–5%).
- **Alternative investment risk:** illiquidity, valuation risk, loss of capital, limited transparency, fee layering, regulatory differences.

Past performance is not indicative of future results.

## Item 9 — Disciplinary Information

Neither Smarter Way Wealth, LLC nor its management persons have been subject to any material legal or disciplinary events.

## Item 10 — Other Financial Industry Activities and Affiliations

### A. Broker-Dealer Registration

Smarter Way Wealth, LLC is not registered as, and does not have a pending application to become, a broker-dealer. No management person is registered as a registered representative of a broker-dealer.

### B. Futures/Commodities Registration

Neither the Firm nor any management person is registered as a futures commission merchant, commodity pool operator, commodity trading advisor, or associated person of any of the foregoing.

### C. Other Financial Industry Activities or Affiliations

No relationships or arrangements with other financial industry participants that would create a material conflict of interest. The Managing Member does not engage in conflicting business activities.

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

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### A. Code of Ethics

Smarter Way Wealth, LLC has adopted a Code of Ethics setting forth standards of conduct for all supervised persons, including: fiduciary duty; confidentiality of client information; prohibition on insider trading; personal securities transaction reporting and pre-clearance; identification and management of conflicts of interest; compliance with applicable laws.

A copy is available upon request at (646) 418-2867 or [compliance@smarterwaywealth.com](mailto:compliance@smarterwaywealth.com).

### B. Personal Trading

The Firm's personnel may buy or sell securities that are the same as or similar to those recommended to clients. To mitigate conflicts: personal trading is reviewed for Code compliance; no front-running; personal trades are not prioritized over client interests. Because the Firm recommends only ETFs, mutual funds, and alternative investments (not individual securities), the practical risk of front-running is substantially reduced.

### C. Participation or Interest in Client Transactions

The Firm does not act as principal or agent in client transactions. The Firm does not recommend securities in which it has a material financial interest.

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## Item 12 — Brokerage Practices

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### A. Selection of Broker-Dealers

Smarter Way Wealth, LLC operates on a brokerage-agnostic basis. Clients select and maintain their own brokerage accounts. The Firm does not evaluate or negotiate best execution on clients' behalf. This eliminates conflicts such as revenue sharing, soft-dollar arrangements, or custodian incentive programs. However, the Firm cannot aggregate trades for volume discounts or monitor transaction costs across client accounts.

### B. Soft-Dollar Benefits

The Firm does not receive soft-dollar benefits from broker-dealers.

### C. Order Aggregation

The Firm does not aggregate client orders. Each client executes their own transactions.

### D. Directed Brokerage

All brokerage is client-directed. Clients may pay higher transaction costs than if the Firm could negotiate volume discounts.

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## Item 13 — Review of Accounts

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### A. Frequency of Reviews

Client accounts are reviewed at least annually by David Van Osdol, CFA, CFP®. More frequent reviews may be triggered by: material changes in the client's situation; significant market events; or client request.

### B. Nature of Reviews

Evaluation of holdings relative to goals, risk tolerance, and time horizon; assessment of whether the financial plan requires updating; consideration of changes in personal or financial circumstances.

### C. Reports Provided to Clients

Formal written summary following each annual review. Ongoing access between reviews. Clients receive account statements directly from their broker-dealer(s) at least quarterly. The Firm does not provide custodial statements. Clients are urged to compare Firm information with broker-dealer statements.

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## Item 14 — Client Referrals and Other Compensation

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### A. Economic Benefits from Non-Clients

The Firm does not receive any economic benefit from non-clients in connection with advisory services.

### B. Referral Arrangements

The Firm does not compensate any person for client referrals and does not participate in solicitation or referral fee arrangements.

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## Item 15 — Custody

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Smarter Way Wealth, LLC does not maintain custody of client funds or securities. All client assets are held at broker-dealer(s)/custodian(s) selected by each client. Clients receive statements directly from their broker-dealer(s) at least quarterly.

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## Item 16 — Investment Discretion

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Smarter Way Wealth, LLC provides advisory services on a non-discretionary basis only. The Firm does not have authority to execute trades or place orders in client accounts. Clients are solely responsible for implementing any investment recommendations by placing trades through their own broker-dealer(s). The Firm's role is limited to providing investment guidance and recommendations.

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## Item 17 — Voting Client Securities

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Smarter Way Wealth, LLC does not vote proxies on behalf of clients. Clients retain responsibility for receiving and voting proxies. Clients receive proxy materials directly from their broker-dealer(s) or issuers. Clients may contact the Firm with questions about a particular proxy solicitation, but the final voting decision rests with the client.

## Item 18 — Financial Information

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### A. Balance Sheet

The Firm does not require prepayment of more than \$500 in fees per client six months or more in advance. No balance sheet is required.

### B. Financial Conditions

No financial condition is reasonably likely to impair the Firm's ability to meet contractual commitments. The Firm has not been subject to a bankruptcy petition.