

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**



**NEW AGE**  
WEALTH ADVISORS

**New Age Wealth Advisors LLC**

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This brochure provides information about the qualifications and business practices of New Age Wealth Advisors LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (908) 342-5174. 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 New Age Wealth Advisors LLC (CRD #315864) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**January 19<sup>th</sup>, 2022**

## **Item 2: Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

New Age Wealth Advisors LLC, formerly Inside Edge Capital Management LLC, has the following material changes to report. Material changes relate to New Age Wealth Advisors LLC's policies, practices or conflicts of interests.

- Inside Edge Capital Management LLC has changed its name to New Age Wealth Advisors LLC.

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## Item 4: Advisory Business

### Firm Description

New Age Wealth Advisors LLC (“NAWA”), formerly Inside Edge Capital Management LLC, was founded in 2020. Todd Gordon is 100% owner.

### Types of Advisory Services

#### ASSET MANAGEMENT

NAWA offers discretionary asset management services to advisory Clients. NAWA will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize NAWA discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, NAWA may hire Sub-Advisors to manage all or a portion of the assets in the Client account. NAWA has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and NAWA. Sub-Advisors execute trades on behalf of NAWA in Client accounts. NAWA will be responsible for the overall direct relationship with the Client. NAWA retains the authority to terminate the Sub-Advisor relationship at NAWA’s discretion.

#### FINANCIAL PLANNING AND CONSULTING

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. NAWA will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time, or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.

- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying, and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of NAWA and the interests of the Client, the Client is under no obligation to act upon NAWA's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through NAWA. Financial plans will be completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation.

#### SEMINARS AND WORKSHOPS

NAWA holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

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

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

#### **Wrap Fee Programs**

NAWA does not sponsor any wrap fee programs.

#### **Client Assets under Management**

As this is the initial filing of this brochure, NAWA has no Client assets under management.

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

#### **Method of Compensation and Fee Schedule**

##### ASSET MANAGEMENT

NAWA offers discretionary direct asset management services to advisory Clients. NAWA charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee
\$0 - \$250,000	1.25%
\$250,001 - \$2,000,000	1.00%
\$2,000,001 - \$5,000,000	.75%
\$5,000,001 - \$10,000,000	.60%
Over \$10,000,000	.40%

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Any assets added to the Account during a given quarter will be charged a pro-rated fee, based on the number of days between the day the assets were added and the end of the applicable quarter, as soon as practicable.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by NAWA with thirty (30) days written notice to Client and by the Client at any time with written notice to NAWA. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to NAWA. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisors fees are inclusive of the fees charged by NAWA. If margin is utilized, the fees will be billed based on the net asset value of the account.

#### FINANCIAL PLANNING AND CONSULTING

In certain cases, NAWA charges a fixed fee for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to NAWA. NAWA reserves the right to waive the fee should the Client implement the plan through NAWA. Fees for financial plans are due upon delivery of the completed plan.

#### FIXED FEES

Financial Planning Services are offered based on a flat fee of no more than \$10,000.



## **Client Payment of Fees**

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay NAWA directly. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to NAWA.

## **Additional Client Fees Charged**

Custodians may charge transaction fees other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Margin interest may also apply for Client electing to utilize margin on their account(s) NAWA does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to NAWA. For more details on the brokerage practices, see Item 12 of this brochure.

## **Prepayment of Client Fees**

NAWA does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Investment management fees are billed quarterly in arrears.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to NAWA.

## **External Compensation for the Sale of Securities to Clients**

NAWA does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of NAWA.

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

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

NAWA does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for NAWA to recommend an investment that may carry a higher degree of risk to the Client.

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

### **Description**

NAWA generally provides investment advice to individuals & high net worth individuals. Client relationships vary in scope and length of service.

## **Account Minimums**

Client agrees to meet NAWA's firm minimum investment level of \$250,000. This may be adjusted at the sole discretion of the advisor depending on a variety of independent factors, including but not limited to, the complexity of the services required to service the account.

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

### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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

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

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in 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.

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 twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

In developing a financial plan for a Client, NAWA's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

### **Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to NAWA. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with NAWA:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. 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 held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

- *Leveraged Risk:* The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading and high expenses.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
- Sub-Advisor fails to execute the stated investment strategy
- Business Risk
- Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisors' Form ADV Part 2.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

NAWA and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

NAWA and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

NAWA and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of NAWA or the integrity of its management.

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

### **Broker-Dealer or Representative Registration**

NAWA is not registered as a broker-dealer and no affiliated representatives of NAWA are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither NAWA nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Todd Gordon has affiliated businesses as the Founder of Trading Analysis which provides investment research and analysis. He is also a contributor for NBC Universal providing market analysis. Lastly, he is a minority owner in Upstate Distilling Company, LLC. Approximately 75% of his time is spent on these activities. He may offer Clients services from those activities and will receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend these services. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these services through another provider of their choosing.

### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

NAWA may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub- Advisor and NAWA. Sub-Advisors execute all trades on behalf of NAWA in Client accounts. NAWA will be responsible for the overall direct relationship with the Client. NAWA retains the authority to terminate the Sub-Advisor relationship at NAWA's discretion.

In addition to the authority granted to NAWA, Clients will grant NAWA full discretionary authority and authorizes NAWA to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to NAWA in the Agreement. In addition, at NAWA's discretion, NAWA may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. NAWA ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

This practice represents a conflict of interest as NAWA may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that NAWA has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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

### **Code of Ethics Description**

The affiliated persons (affiliated persons include employees and/or independent contractors) of NAWA have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of NAWA affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of NAWA. The Code reflects NAWA and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

NAWA's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of NAWA may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

NAWA's Code is based on the guiding principle that the interests of the Client are our top priority. NAWA's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company. The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

NAWA will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

NAWA and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

NAWA and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide NAWA with copies of their brokerage statements.

The Chief Compliance Officer of NAWA is Todd Gordon. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

NAWA may maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, the firm and affiliated persons are required to disclose all reportable securities transactions as well as provide NAWA with copies of their brokerage statements.

The Chief Compliance Officer of NAWA is Todd Gordon. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

NAWA will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. NAWA will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. NAWA relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by NAWA. NAWA does not receive any portion of the trading fees.

NAWA will recommend the use of TD Ameritrade.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by NAWA from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although NAWA has no formal soft dollar arrangements, NAWA may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or “soft dollar benefits”. As permitted by Section 28(e) of the Securities Exchange Act of 1934, NAWA receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of NAWA. NAWA cannot ensure that a particular client will benefit from soft dollars or the client’s transactions paid for the soft dollar benefits. NAWA does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when NAWA receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that NAWA has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

NAWA does not accept any of these benefits.

- *Brokerage for Client Referrals*

NAWA does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.



- *Directed Brokerage*

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

### **Aggregating Securities Transactions for Client Accounts**

NAWA manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

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

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of NAWA. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, NAWA suggests updating at least annually.

### **Review of Client Accounts on Non-Periodic Basis**

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

### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by NAWA's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

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

### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

NAWA does not receive any economic benefits from external sources.

### **Advisory Firm Payments for Client Referrals**

NAWA does not compensate for Client referrals.

## **Item 15: Custody**

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by NAWA.

NAWA is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of NAWA.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

NAWA requires discretionary authority to manage securities accounts on behalf of Clients. NAWA has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

NAWA allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to NAWA in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. NAWA does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

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

### **Proxy Votes**

NAWA does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, NAWA will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

### **Balance Sheet**

A balance sheet is not required to be provided to Clients because NAWA does not serve as a custodian for Client funds or securities and NAWA does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

NAWA has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

### **Bankruptcy Petitions during the Past Ten Years**

NAWA has not had any bankruptcy petitions in the last ten years.

## **Item 19: Requirements for State Registered Advisors**

### **Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

### **Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

### **Performance Based Fee Description**

Neither NAWA nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

### **Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

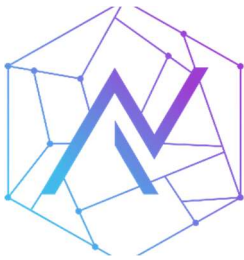
Neither NAWA nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: An investment or an investment-related business or activity;
  - a) Fraud, false statement(s) or omissions;
  - b) Theft, embezzlement or other wrongful taking of property;
  - c) Bribery, forgery, counterfeiting, or extortion;
  - d) Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.

**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

**Item 1 Cover Page  
Supervised Person Brochure  
Form ADV Part 2B**



**NEW AGE**  
WEALTH ADVISORS

**New Age Wealth Advisors LLC**

**Todd Gordon**

**Office Address:**

13 Primrose Circle  
Saratoga Springs, NY  
12866

Tel: (908) 342-5174

todd@newagewealth.com

www.newagewealth.com

This brochure supplement provides information about Todd Gordon and supplements the New Age Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Todd Gordon if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Todd Gordon (CRD #4731474) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**January 19<sup>th</sup>, 2022**

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

#### **Principal Executive Officer – Todd Gordon**

- Year of birth: 1979

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

#### Educational Background:

- St Lawrence University; Economics
- SUNY Albany NY; Bachelor of Arts in Economics

#### Business Experience:

- New Age Wealth Advisors LLC; Managing Member/Investment Advisor
- Representative; 07/2021 – Present
- Trading Analysis; Founder; 12/2012 – Present
- NBC Universal; CNBC Contributor; 01/2010 – Present

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

A. Todd Gordon has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Todd Gordon never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Todd Gordon has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or

2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or

(c) fined more than \$2,500.

D. Todd Gordon has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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

Todd Gordon has affiliated businesses as the Founder of Trading Analysis which provides investment research and analysis. He is also a contributor for NBC Universal providing market analysis. Lastly, he is a minority owner in Upstate Distilling Company, LLC. Approximately 75% of his time is spent on these activities. He may offer Clients services from those activities and will receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend these services. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these services through another provider of their choosing.

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

Todd Gordon does not receive any performance-based fees nor compensation for advisory services other than what is described in Item 5 of the ADV 2A.

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

Since Todd Gordon is the sole owner and investment adviser representative of NAWA he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at [todd@newagewealth.com](mailto:todd@newagewealth.com) or (908) 342-5174.

## **Item 7 - Requirements for State-Registered Advisors**

- A. Todd Gordon has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.
  2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.
- B. Todd Gordon has never been the subject of a bankruptcy petition.



**Item 1 Cover Page  
Supervised Person Brochure  
Form ADV Part 2B**



**NEW AGE**  
WEALTH ADVISORS

**New Age Wealth Advisors LLC**

**Ryan Bouchey**

**Office Address:**

13 Primrose Circle  
Saratoga Springs, NY  
12866

Tel: (908) 342-5174

[ryan@newagewealth.com](mailto:ryan@newagewealth.com)

[www.newagewealth.com](http://www.newagewealth.com)

This brochure supplement provides information about Ryan Bouchey and supplements the New Age Wealth Advisors LLC brochure. You should have received a copy of that brochure. Please contact Ryan Bouchey if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan Bouchey CRD #5457587) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**January 19<sup>th</sup>, 2022**

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

#### **Investment Advisor Representative– Ryan Bouchey**

- Year of birth: 1984

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

##### Educational Background:

- Bentley University; Bachelor of Science Finance
- Bentley University; Master's in Financial Planning & Certificate in Taxation Business

##### Experience:

- New Age Wealth Advisors LLC; Investment Advisor Representative; 10/2021 – Present
- Bouchey Financial Group; Investment Advisor Representative; 9/2012 - 9-2021
- Ernst & Young - Financial Services Office; 7/2007 - 8-2012

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

A. Ryan Bouchey has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Ryan Bouchey never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority

(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

C. Ryan Bouchey has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

D. Ryan Bouchey has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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

N/A

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

Ryan Bouchey does not receive any performance-based fees nor compensation for advisory services other than what is described in Item 5 of the ADV 2A.

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

Ryan Bouchey will be supervised by Todd Gordon. He will adhere to the policies and procedures as described in the firm's Compliance Manual. Todd can be reached at [todd@newagewealth.com](mailto:todd@newagewealth.com) or (908) 342-5174.

#### **Item 7 - Requirements for State-Registered Advisors**

- A. Ryan Bouchey has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.
  2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property

- d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.
- B. Ryan Bouchey has never been the subject of a bankruptcy petition.