



Sightline Wealth Advisors

## **Sightline Wealth Advisors LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 20, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Sightline Wealth Advisors LLC (“Sightline” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

Sightline is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Sightline to assist you in determining whether to retain the Advisor.

Additional information about Sightline and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 176520.

#### **Sightline Wealth Advisors LLC**

**Groton Office**  
495 Gold Star Highway  
Suite 100  
Groton, CT 06340-6229

**Madison Office**  
752 Boston Post Rd.  
Second Floor  
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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Sightline.

Sightline believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Sightline encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Sightline.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 176520. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (860) 448-0611.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Sightline Wealth Advisors LLC (“Sightline” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a limited liability company (“LLC”) under the laws of the State of Connecticut. Sightline became a registered investment advisor in April 2015. Sightline is owned and operated by Stefan “Alex” Pellish (Principal and Chief Compliance Officer) and Mark J. Steffen (Principal). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Sightline.

### **B. Advisory Services Offered**

Sightline offers investment advisory services to individuals, high net worth individuals, and businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Sightline provides unbiased investment advice to help Clients achieve their financial goals. At Sightline, we believe in a long-term approach to building Client wealth through a combination of passive and active management, asset allocation, diversification, and risk management. We further believe that investment management must be aligned with proper, ongoing financial planning to fully understand a Client’s needs and to help them achieve and maintain their financial independence.

Sightline typically begins each Client engagement with a financial planning process to identify the Client’s goals and time-based needs. Sightline will assist the Client in defining financial goals and formulating an investment policy statement based on these goals and the Client’s financial situation, time horizon and tolerance to take investment risk.

Details of these services are described below.

#### Financial Planning Services

As noted above, Sightline generally conducts a formal financial planning process at the start of its relationship each Client. Sightline will also provide a variety of financial planning services to individuals, families and businesses separate from this process. The services are tailored to the specific needs of each Client. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made to start or revise a Client’s investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Sightline may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of a Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any

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recommendations made by the Advisor or to maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### Investment Management Services

Sightline provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and advisory services. Sightline works with each Client to identify investment goals, objectives, risk tolerance and financial situation in order to create a long-term portfolio strategy. Sightline will then construct a portfolio primarily comprised of exchange-traded funds (“ETFs”) and institutional or no-load mutual funds to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, individual bonds, covered options, and certificates of deposit to meet the needs of its Clients. In certain circumstances, the Advisor may also recommend alternative investments to meet the needs of a particular Client.

Sightline’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Sightline will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Sightline evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Sightline may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Sightline may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Sightline may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Sightline accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the terms of the Client investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices.

### **C. Client Account Management**

Prior to engaging Sightline to provide investment advisory services, each Client is required to enter into one or more advisory agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Strategy – Sightline, in connection with the Client, will develop a strategy that seeks to achieve the Client’s investment goals and objectives.
- Asset Allocation – Sightline will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk of each Client.
- Portfolio Construction – Sightline will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Sightline will provide investment management and ongoing oversight of the Client’s investment portfolio.

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

Sightline does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Sightline.

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## E. Assets Under Management

As of December 31, 2018, Sightline manages the following assets:

Discretionary Assets	\$104,678,240
Non-Discretionary Assets	48,578,930
<b>Total Assets Under Management</b>	<b>\$153,257,170</b>

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall enter into one or more advisory agreements that detail the responsibilities of Sightline and the Client.

### A. Fees for Advisory Services

#### Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each quarter. Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Rate (%)
Up to \$1,000,000*	0.95%
Next \$1,000,000 (Up to \$2,000,000)	0.85%
Next \$1,000,000 (Up to \$3,000,000)	0.75%
Next \$2,000,000 (Up to \$5,000,000)	0.60%
Over \$5,000,000	0.40%

\* Minimum annual fee of \$2,500.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. Certain Clients may be offered a fee schedule that differs from the schedule above. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Sightline will be independently valued by the Custodian. Sightline will not have the authority or responsibility to value portfolio securities.

#### Financial Planning Services

Sightline offers financial planning services on an hourly basis at a rate of up to \$350 per hour or on a fixed fee basis ranging from \$1,000 to \$7,500 per engagement. Financial planning fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or costs will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

### B. Fee Billing

#### Investment Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Sightline at the end of each calendar quarter. Clients will be provided with a statement, at least quarterly, from the Custodian

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reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Sightline directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Financial Planning Services

Financial planning fees are generally invoiced up to fifty percent (50%) upon execution of the financial planning agreement with the balance due upon completion of the agreed upon deliverable[s].

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Sightline, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment advisory fee charged by Sightline is separate and distinct from these custody and execution fees.

In addition, all fees paid to Sightline for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Sightline, but would not receive the services provided by Sightline which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Sightline to fully understand the total fees to be paid. Please see Item 12 – Brokerage Practices.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

Sightline is compensated for its investment management services at the end of the quarter, after investment management services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

Sightline may be partially compensated for its financial planning services prior to starting the engagement. Either party may terminate the financial planning agreement, at any time, by providing written notice to the other party. The Client may also terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis. Upon termination, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or percentage completion of any fixed fee engagement. Upon termination, any unearned, prepaid fees will be promptly refunded. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

Sightline does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

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Sightline does not charge performance-based fees for its investment advisory services. The fees charged by Sightline are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Sightline does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## Item 7 – Types of Clients

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Sightline offers investment advisory services to individuals, high net worth individuals, and businesses. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Sightline generally does not impose a minimum account size for establishing a relationship, but does have a minimum annual fee of \$2,500, which may be reduced at the sole discretion of the Advisor.

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

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### A. Methods of Analysis

Sightline primarily employs fundamental analysis methods in developing investment strategies for its Clients, but may also employ technical analysis and other methods. Research and analysis from Sightline is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Sightline generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Sightline will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Sightline may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Sightline will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or the Client's designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

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The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving Sightline or any of its Supervised Persons.** Sightline values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 176520.

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

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Sightline does not maintain any other financial industry affiliations and does not offer any other products or services to its Clients where a commission is earned. Sightline and its Supervised Persons are not affiliated with a broker-dealer and are not commodity pool operators, commodity trading advisors or affiliated with any such firms. Certain Supervised Persons are still insurance licensed, but they do not implement insurance products for a commission. Sightline is a “fee-only” advisory firm.

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

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

Sightline has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Sightline (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Sightline and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Sightline Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

### **B. Personal Trading with Material Interest**

Sightline allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Sightline does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Sightline does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Sightline allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Sightline may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Sightline requiring reporting of personal securities trades by its employees for review by the Chief Compliance Officer (“CCO”). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While Sightline allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Sightline, or any Supervised Person of Sightline, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Sightline does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Sightline to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Sightline does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

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Where Sightline does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using the Custodian not recommended by Sightline. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Sightline may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. Sightline does not receive research services, other products, or compensation as a result of recommending a particular custodian that may result in the Client paying higher commissions than those obtainable through other custodians. Sightline will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Sightline maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Sightline does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from Schwab. Please see Item 14 below.**

**2. Brokerage Referrals** - Sightline does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Sightline will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Sightline will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Sightline will execute its transactions through the Custodian as directed by the Client. Sightline may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Investments in Client accounts are monitored on a regular and continuous basis by a Principal of Sightline. Formal account reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large

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#### **Sightline Wealth Advisors LLC**

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deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Sightline if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Sightline**

Sightline does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Sightline may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Sightline may receive referrals of new Clients from a third-party.

#### Participation in Institutional Advisor Platform

Sightline has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Sightline. As a registered investment advisor participating on the Schwab Advisor Services platform, Sightline receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to Sightline that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. Sightline believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

### **B. Client Referrals from Solicitors**

Sightline does not engage paid solicitors for Client referrals.

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## **Item 15 – Custody**

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Sightline does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Sightline to utilize the Custodian for the Client's security transactions. Sightline encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

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Sightline generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Sightline. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Sightline will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Sightline does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Sightline, nor its management have any adverse financial situations that would reasonably impair the ability of Sightline to meet all obligations to its Clients. Neither Sightline, nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. Sightline is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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## Sightline Wealth Advisors

### **Form ADV Part 2B – Brochure Supplement**

**for**

**Stefan “Alex” Pellish, CFP<sup>®</sup>, ChFC<sup>®</sup>, CIMA<sup>®</sup>, CLTC, CLU<sup>®</sup>  
Principal and Chief Compliance Officer**

**Effective: March 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Stefan A. Pellish (CRD# **2726284**) in addition to the information contained in the Sightline Wealth Advisors, LLC (“Sightline” or the “Advisor”) (CRD # 176520) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sightline Disclosure Brochure or this Brochure Supplement, please contact us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

Additional information about Mr. Pellish is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2726284.

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## Item 2 – Educational Background and Business Experience

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Stefan “Alex” Pellish is a Principal and the Chief Compliance Officer of Sightline. Mr. Pellish, born in 1968, is dedicated to advising Clients of Sightline. Mr. Pellish earned a Bachelor of Arts in Communications and Marketing from University of Connecticut in 1990. Additional information regarding Mr. Pellish’s employment history is included below.

### Recent Employment History:

Principal and Chief Compliance Officer, Sightline Wealth Advisors, LLC	04/2015 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	11/1996 to 05/2015

### Certified Financial Planner (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP® Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Chartered Financial Consultant® (“ChFC®”)

The Chartered Financial Consultant® (ChFC®) program focuses on the advanced financial planning needs of individuals, professionals and small business owners. The program offers an individual a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning.

#### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning.
- Demonstrate mastery of the core financial planning knowledge required of a CERTIFIED FINANCIAL PLANNER™ by passing the CFP® certification exam.
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

### Certified Investment Management Analyst<sup>SM</sup> (“CIMA®”)

The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, pass an online Certification Examination, and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements. CIMA® designees are required to adhere to IMCA’s Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (“IMCA”). The CIMA certification has earned ANSI® (American National Standards Institute) accreditation under the personnel certification program. The American National Standards Institute, or ANSI, is a private non-profit organization that facilitates standardization and conformity assessment activities in the United States. CIMA is the first financial services credential to meet this international standard for personnel certification.

### Certified in Long-term Care (“CLTC”)

The CLTC designation is a long-term care planning designation granted for Long-term Care Certification to individuals who satisfy educational, work experience and ethics requirements. Recipients of the CLTC have completed a rigorous multi-disciplinary course and examination that focuses on long-term care. To maintain this designation, the CLTC must satisfy continuing education requirements and adhere to the CLTC Code of Professional Responsibility.

### The Chartered Life Underwriter (“CLU®”)

The Chartered Life Underwriter® (CLU®) is a designation of insurance expertise, helping gain a significant advantage in a competitive market. This course of study helps by providing in-depth knowledge on the insurance needs of individuals, business owners and professional clients.

#### Program Learning Objectives

- Provide guidance to clients on types and amounts of life insurance needed.
- Make recommendations on aspects of risk management, including personal and business uses of a variety of insurance solutions.
- Provide guidance to clients on legal aspects of life insurance contracts and beneficiaries.
- Assist clients in making decisions about estate planning, including proper holding of assets and title to assets, as well as the implications of various wills and trust arrangements on financial, retirement and succession planning issues,
- Provide a holistic and comprehensive approach to addressing the insurance planning needs of their clients.

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Pellish.*** Mr. Pellish has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Pellish.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Pellish.***

However, we do encourage you to independently view the background of Mr. Pellish on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2726284.

### Item 4 – Other Business Activities

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Mr. Pellish is dedicated to the investment advisory activities of Sightline's Clients. Mr. Pellish does not have any other business activities to disclose.

### Item 5 – Additional Compensation

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Mr. Pellish is dedicated to the investment advisory activities of Sightline's Clients. Mr. Pellish does not receive any additional compensation.

### Item 6 – Supervision

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Mr. Pellish serves as a Principal and the Chief Compliance Officer of Sightline. Mr. Pellish can be reached at (860) 448-0611.

Sightline has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sightline. Further, Sightline is subject to regulatory oversight by various agencies. These agencies require registration by Sightline and its Supervised Persons. As a registered entity, Sightline is subject to examinations by regulators, which may be announced or unannounced. Sightline is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Sightline Wealth Advisors

### **Form ADV Part 2B – Brochure Supplement**

for

**Mark J. Steffen, CFP®  
Principal**

**Effective: March 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Mark J. Steffen (CRD# **2457526**) in addition to the information contained in the Sightline Wealth Advisors, LLC (“Sightline” or the “Advisor”) (CRD # 176520) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sightline Disclosure Brochure or this Brochure Supplement, please contact us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

Additional information about Mr. Steffen is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2457526.

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## Item 2 – Educational Background and Business Experience

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Mark J. Steffen, CFP® is a Principal of Sightline. Mr. Steffen, born in 1975, is dedicated to advising Clients of Sightline. Mr. Steffen earned a B.S. in Finance and Economics (Magna Cum Laude) from Boston College in 1998. Additional information regarding Mr. Steffen's employment history is included below.

### Employment History:

Principal, Sightline Wealth Advisors, LLC	04/2015 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	03/2002 to 05/2015

### Certified Financial Planner ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by CFP® Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Steffen.*** Mr. Steffen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Steffen.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Steffen.***

However, we do encourage you to independently view the background of Mr. Steffen on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2457526.

### Item 4 – Other Business Activities

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Mr. Steffen is dedicated to the investment advisory activities of Sightline's Clients.

However as of April 2018, Mr. Steffen is a Board Member of the Town of Madison Economic Development Commission, where he spends less than 10% of trading hours in this role. Mr. Steffen is not compensated for this role.

### Item 5 – Additional Compensation

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Mr. Steffen is dedicated to the investment advisory activities of Sightline's Clients. Mr. Steffen does not receive any additional compensation.

### Item 6 – Supervision

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Mr. Steffen serves as a Principal of Sightline and is supervised by Stefan A. Pellish also a Principal and the Chief Compliance Officer. Mr. Pellish can be reached at (860) 448-0611.

Sightline has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sightline. Further, Sightline is subject to regulatory oversight by various agencies. These agencies require registration by Sightline and its Supervised Persons. As a registered entity, Sightline is subject to examinations by regulators, which may be announced or unannounced. Sightline is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## **Form ADV Part 2B – Brochure Supplement**

**for**

**William E. Duvall  
Trade Operations and Money Movement Specialist**

**Effective: March 20, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of William E. Duvall (CRD# 4746407) in addition to the information contained in the Sightline Wealth Advisors, LLC (“Sightline” or the “Advisor”, CRD# 176520) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sightline Disclosure Brochure or this Brochure Supplement, please contact us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

Additional information about Mr. Duvall is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4746407.

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## Item 2 – Educational Background and Business Experience

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William E. Duvall, born in 1965, is dedicated to advising Clients of Sightline as the Trade Operations and Money Movement Specialist. Mr. Duvall earned an Associate of Arts from the University of Phoenix in 2003. Additional information regarding Mr. Duvall's employment history is included below.

### Employment History:

Trade Operations and Money Movement Specialist, Sightline Wealth Advisors, LLC	04/2015 to Present
Paraplanner, Pellish and Steffen, LLC	11/2007 to 05/2015
Staff, Seely-Butler, Pellish and Steffen, LLC	08/2003 to 11/2007

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Duvall.** Mr. Duvall has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Duvall.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Duvall.**

However, we do encourage you to independently view the background of Mr. Duvall on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4746407.

## Item 4 – Other Business Activities

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Mr. Duvall is dedicated to the investment advisory activities of Sightline's Clients. Mr. Duvall does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Duvall is dedicated to the investment advisory activities of Sightline's Clients. Mr. Duvall does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Duvall serves as the Trade Operations and Money Movement Specialist of Sightline and is supervised by Stefan Pellish, the Chief Compliance Officer. Mr. Pellish can be reached at (860) 448-0611.

Sightline has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Sightline. Further, Sightline is subject to regulatory oversight by various agencies. These agencies require registration by Sightline and its Supervised Persons. As a registered entity, Sightline is subject to examinations by regulators, which may be announced or unannounced. Sightline is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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### Sightline Wealth Advisors LLC

Groton Office: 495 Gold Star Highway, Suite 100, Groton, CT 06340-6229

Madison Office: 752 Boston Post Road, Second Floor, Madison, CT 06443

Phone: (860) 448-0611 \* Fax: (860) 445-0269

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

## Privacy Policy

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Effective: March 20, 2019

### Our Commitment to You

Sightline Wealth Advisors LLC (“Sightline” or the “Advisor”) is committed to safeguarding the use of personal information of our Client’s (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Sightline (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Sightline does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Sightline does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Sightline or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Sightline does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (860) 448-0611 or by email at [info@sightlinewa.com](mailto:info@sightlinewa.com).

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