Item 1: Cover Page

### White Sand Wealth Management, LLC

131 S Water Street Liberty, MO 64068

### Form ADV Part 2A – Firm Brochure

(816) 429-6743

https://wswm.net

Dated March 27, 2024

This Brochure provides information about the qualifications and business practices of White Sand Wealth Management, LLC, "WSWM". If you have any questions about the contents of this Brochure, please contact us at (816) 429-6743. 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. White Sand Wealth Management, LLC is registered as an Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about WSWM is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 304614.

### Item 2: Material Changes

The last annual update of this Brochure was filed on January 17, 2024. Since this filing, the following material changes have occurred:

- We filed for SEC Registration in March 2024 and have updated various disclosure items to reflect SEC Registration.
- We have removed the use of Pontera from Item 4.

In the future, any material changes made during the year will be reported here.

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete 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 White Sand Wealth Management, LLC.

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### Item 4: Advisory Business

### **Description of Advisory Firm**

White Sand Wealth Management, LLC is registered as an Investment Adviser with the State of Missouri. We were founded in May 2019. Joel Huet is the principal owner of WSWM. WSWM currently reports \$ 111,333,190 discretionary and no non-discretionary Assets Under Management as of December 31, 2023.

### **Types of Advisory Services**

#### **Investment Management Services**

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

We may also use the services of Third-Party Managers (also referred to throughout this Brochure as "outside managers" or "sub-advisers") to assist in the portfolio management process. Prior to selecting and engaging in the services of a third-party manager, we will ensure they are appropriately registered or exempt from registration in all necessary jurisdictions. We will ensure we assist Clients in selecting an appropriate allocation model, completing the outside manager's investor profile questionnaire, interacting with the outside manager, and reviewing the outside manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

#### **Project Based Financial Planning Services**

We provide project based financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning involves an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a

written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

• Cash Flow and Debt Management: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

• **College Savings:** Includes projecting the amount that will be needed to achieve college or other post- secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

• Employee Benefits Optimization: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

• Estate Planning: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

• **Financial Goals**: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

• **Insurance**: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

• **Investment Analysis**: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure. • **Retirement Planning**: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

• **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

• **Tax Planning Strategies**: Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

#### **Ongoing Financial Planning**

This service involves working one-on-one with a planner over an extended period of time. By paying a fixed monthly fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

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

We offer the same suite of services to all of our clients. However, specific Client financial plans and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

### Wrap Fee Programs

We do not participate in wrap fee programs.

### Item 5: Fees and Compensation

Please note, unless a client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

#### Investment Management Services (WSWM Manages)

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

#### Account Value Annual Advisory Fee

\$0 - \$1,000,000 1.00% \$1,000,001 - \$2,000,000 0.75% \$2,000,001 - \$3,000,000 0.60% \$3,000,001 and Above 0.50%

The annual fees are negotiable and are pro-rated and paid in arrears on a monthly basis. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the account value as of the last business day of the month.

As an example, the annual fee on the management of 2,000,000 would be 17,500 The fee is calculated as follows:  $(1,000,000 \times 1.00\% = 10,000) + (1,000,000 \times 0.75\% = 7500) = 17,500$  (0.875% of Assets Under Management). The monthly fee would be 1,458.33.

No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from Client accounts, or the Client may choose to pay by check. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

When a Third-Party Manager is used, the Third-Party Manager will debit the Client's account for both the Third-Party Manager's fee, and WSWM's advisory fee, and will remit WSWM's fee to WSWM. Please note, the above fee schedule does include the Third-Party Manager's fee. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

### **Ongoing Financial Planning**

Ongoing Financial Planning consists of an ongoing fee that is paid monthly, in advance, at the rate of \$250-\$3,000, depending on complexity and needs of the client, per month. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. Due to the level of work conducted at the beginning of this service, a 12-month commitment is required. Once the service enters its thirteenth month, this service may be terminated with 30 days' notice. Upon termination of any agreement, the fee will be prorated, and any unearned fee will be refunded to the Client.

### **Project Based Financial Planning Fixed Fee**

Financial Planning can be offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$3,000 and \$5,000. The fee is negotiable. If a fixed fee program is chosen, half of the fee is due at the beginning of the process and the remainder is due at completion of work, however, WSWM will not bill an amount above \$500.00 more than 6 months in advance. Fees for this service may be paid by electronic funds transfer or check. In the event of early termination any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged.

#### **Financial Planning Hourly Fee**

Hourly Financial Planning engagements are offered at an hourly rate of \$250 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

#### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending brokerdealers for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

### Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profiting sharing plans and corporations or other businesses.

Our minimum account size requirement is \$250,000.

# Item 8: Methods of Analysis, Investment

### Strategies and Risk of Loss

Our primary methods of investment analysis involve fundamental and technical analysis when assessing individual investments. Our core investment strategies involve a combination of passive and active investment management with regard to the funds we select as described below. We may also use the services of outside money managers to aid in the portfolio management process.

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

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Use of Third Party Managers:** We may refer Clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

#### **Passive and Active Investment Management**

We primarily practice a combination of passive and active investment management. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds. Passive investment management is characterized by low portfolio expenses, minimal trading costs, and relative tax efficiency. In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

#### **Material Risks Involved**

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage

commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

#### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common Stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same

general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. 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; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) 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. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Investment Companies Risk.** When a client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of 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).

### Item 9: Disciplinary Information

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

### Self-Regulatory Organization Enforcement Proceedings

WSWM 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 WSWM or the integrity of its management.

### Item 10: Other Financial Industry Activities and

### Affiliations

No WSWM employee is registered, or have an application pending to register, as a brokerdealer or a registered representative of a broker-dealer.

No WSWM employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

WSWM does not have any related parties. As a result, we do not have a relationship with any related parties.

WSWM only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

#### **Recommendations or Selections of Other Investment Advisers**

As referenced in Item 4 of this brochure, WSWM recommends Clients to Third Party Managers to manage their accounts. In the event that we recommend a Third-Party Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Third-Party Manager we recommend. Additionally, WSWM will only recommend a Third-Party Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc. and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

#### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity Associated persons shall offer and provide professional services with integrity.
- Objectivity Associated persons shall be objective in providing professional services to Clients.

• Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

• Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

• Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.

• Professionalism - Associated persons' conduct in all matter shall reflect the credit of the profession.

• Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

### Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

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

Our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options, or futures, which we recommend to Clients.

#### Trading Securities At/Around the Same Time as Client's Securities

Because our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options, or futures, which we recommend to Clients, we do not trade in securities at or around the same time as Clients.

### Item 12: Brokerage Practice

#### Factors Used to Select Custodians

Advisor does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security, and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc., a registered broker-dealer, member FINRA and SIPC ("Schwab"). Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab. We are not affiliated with Schwab. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening documentation.

#### **Research and Other Soft-Dollar Benefit**

Advisor does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services<sup>™</sup> is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor, or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets.

The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to Client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
- provide pricing and other market data
- facilitate payment of our fees from our Clients' accounts
- assist with back-office functions, recordkeeping, and Client reporting

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

#### **Brokerage for Client Referrals**

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

#### Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

#### Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients.

This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

### Item 13: Review of Accounts

Client accounts with the Investment Advisory Service will be reviewed regularly on a quarterly basis by Joel Huet, Owner, or Kelly Kariker, Sr. Financial Advisor. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

WSWM will provide written reports to Investment Advisory Clients on a monthly basis. We urge Clients to compare these reports against the account statements they receive from their custodian.

### Item 14: Client Referrals and Other

### Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients.

### Item 15: Custody

WSWM does not hold, directly or indirectly, Client funds or securities, or have any authority to obtain possession of them. All Client assets are held at a qualified custodian.

If WSWM deducts its advisory fee from Client's account(s), the following safeguards will be applied:

- i. The Client will provide written authorization to WSWM, permitting us to be paid directly from Client's accounts held by the custodian.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, we maintain discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

### Item 17: Voting Client Securities

WSWM does not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

### Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$1200 in fees per Client six months in advance of rendering services.

### White Sand Wealth Management, LLC

131 S Water Street Liberty, MO 64068

Form ADV Part 2B – Brochure Supplement

(816) 429-6743

Joel@wswm.net

Dated March 27, 2024

For Joel Huet 6096770

Owner

This brochure supplement provides information about Joel Huet that supplements the White Sand Wealth Management, LLC ("WSWM") brochure. A copy of that brochure precedes this supplement. Please contact Joel Huet if the WSWM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Joel Huet is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6096770.

# Item 2: Educational Background and Business Experience

### Joel Huet

Born: 1964

### **Educational Background**

- 1986 Bachelor of Business Administration, Fort Hays State University
- 1992 Masters of Business Admin Finance, University of Missouri-Kansas City
- 2000 CFP Professional Education Program College for Financial Planning

### **Business Experience**

- 05/2019 Present, White Sand Wealth Management, LLC, Owner
- 10/2018 05/2019, Open Road Wealth Management, Partner
- 2011 2018, BOK Financial, Trust Market Manager
- 2006 2011, Blue Ridge Bank and Trust Co., Wealth Management Division Manager

### **Professional Designations, Licensing & Exams**

**CFP (Certified Financial Planner) (B):** The CERTIFIED FINANCIAL PLANNERTM, CFP(B) and federally registered CFP (with flame design) marks (collectively, the "CFP(B) 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 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.

**CTFA (Certified Trust and Financial Advisor)** - CTFA certificants must have a minimum of three years of experience in the field as well as completion of an approved educational program as dictated by the American Bankers Association. They must pass a comprehensive exam followed up by on-going continuing education each year. A CTFA practitioners agree to abide by **a strict code of professional conduct.** 

**CISP (Certified IRA Services Professional)** - CISP certificants must have a minimum of two years of experience in the field as well as completion of an approved educational program as dictated by the American Bankers Association. They must pass a comprehensive exam followed up by on-going continuing education each year. A CISP practitioners agree to abide by a strict code of professional conduct.

# Item 3: Disciplinary Information

No management person at White Sand Wealth Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

# Item 4: Other Business Activities

Joel Huet is a council member at the Children's Mercy Hospital Planned Giving Council where he conducts quarterly meetings with members of the hospital. This activity accounts for up to 1 hour per month. Non- Investment related.

Joel Huet is a current member of the Financial Planning Association (FPA) and the National Association of Personal Financial Advisors (NAPFA). These are industry trade organization memberships that may account for up to 1 hour per month of Joel's time. Non-Investment Related.

# Item 5: Additional Compensation

Joel Huet does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through WSWM.

# Item 6: Supervision

Karen Burris is the Chief Compliance Officer of WSWM and is responsible for supervision. Karen may be contacted at (816) 429-6743.

### White Sand Wealth Management, LLC

131 S Water Street Liberty, MO 64068

Form ADV Part 2B – Brochure Supplement

(816) 429-6743

Karen@wswm.net

Dated March 27, 2024

#### For Karen Burris 6097620

Senior Financial Advisor and Chief Compliance Officer

This brochure supplement provides information about Karen Burris that supplements the White Sand Wealth Management, LLC ("WSWM") brochure. A copy of that brochure precedes this supplement. Please contact Karen Burris if the WSWM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Karen Burris is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6097620.

# Item 2: Educational Background and Business Experience

Karen Burris

Born: 1959

### **Educational Background**

• 1982 - Bachelor of Science in Psychology, Missouri Western State University

### **Business Experience**

- 09/2019 Present, White Sand Wealth Management, Senior Financial Advisor and CCO
- 02/2011 09/2019, BOK Financial, Senior Trust Officer
- 2006 2011, Blue Ridge Bank and Trust Co., Trust Officer

### **Professional Designations, Licensing & Exams**

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## Item 3: Disciplinary Information

No management person at White Sand Wealth Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

# Item 4: Other Business Activities

Karen Burris is a volunteer for Hillcrest Hope as a budget counselor. This activity accounts for up to 1 hour per month. Non- Investment related.

# Item 5: Additional Compensation

Karen Burris does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through WSWM.

# Item 6: Supervision

Karen Burris is the Chief Compliance Officer of WSWM and is responsible for supervision. Karen may be contacted at (816) 429-6743.

### White Sand Wealth Management, LLC

131 S Water Street Liberty, MO 64068

Form ADV Part 2B – Brochure Supplement

(816) 429-6743

Kelly@wswm.net

Dated March 27, 2024

#### For Kelly Kariker 6792877

Senior Financial Advisor

This brochure supplement provides information about Kelly Kariker that supplements the White Sand Wealth Management, LLC ("WSWM") brochure. A copy of that brochure precedes this supplement. Please contact Kelly Kariker if the WSWM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kelly Kariker is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6792877.

# Item 2: Educational Background and Business Experience

### Kelly Kariker

Born: 1977

### **Educational Background**

- 2000 Bachelor of Arts Psychology, William Jewell College
- 2006 CFP Professional Education Program College for Financial Planning

### **Business Experience**

- 04/2022 Present, White Sand Wealth Management, LLC, Senior Financial Advisor
- 11/2016 03/2022, BOK Financial, Private Wealth Investment Manager
- 2003 2016, Commerce Trust Company, Portfolio Manager

### **Professional Designations, Licensing & Exams**

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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.

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• Examination – Pass the comprehensive CFP® Certification Examination. The examination 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.

**RSSA (Registered Social Security Analyst) (B):** The RSSA **(B)** designation is overseen by the <u>National Association of Registered Social Security Analysts</u> (NARSSA). NARSSA is a private for-profit company set up to provide an online education system for financial professionals to learn how to help others make the most of Social Security.

A financial advisor with a designation as a registered social security analyst (RSSA) is trained to use specialized financial software to help with this important decision.

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

• Obtain a preparer tax identification number (PTIN) from the Internal Revenue Service, or already have acceptable credentials which include certified public accountant, certified financial planner, attorney, enrolled agent, securities broker and insurance agent.

• Five self-study modules make up the educational requirements. The courses include lessons about the history of Social Security and how it is funded, spousal benefits, claiming strategies, taxation of benefits, Medicare and how to market and operate a Social Security advisor business.

• The last module consists in learning about the optimization software. Students are taught how to gather and enter client information, conduct the analysis and generate and present a report advising the client on the best strategies, such as the best age to begin collecting benefits.

• After completing each module, applicants have to pass a test on that module. There is also a final exam. The proctored exam is three hours long and includes the requirement to generate what-if scenarios for maximizing a client's Social Security benefits.

- The RSSA courses take 15 to 25 hours.
- RSSA® professionals also have to maintain membership in the NARSSA.

• In addition to ongoing membership fees, RSSA® professionals have to complete four credits in continuing education. The continuing education courses are included in the annual membership.

• Earning the RSSA® demonstrates to clients and peers a dedication to the highest standard of ethical conduct and service.

# Item 3: Disciplinary Information

No management person at White Sand Wealth Management, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

# Item 4: Other Business Activities

Kelly Kariker is not currently involved in any other business activities.

# Item 5: Additional Compensation

Kelly Kariker does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through WSWM.

# Item 6: Supervision

Karen Burris is the Chief Compliance Officer of WSWM and is responsible for supervision. Karen may be contacted at (816) 429-6743.