

Item 1: Cover Sheet

FORM ADV PART 2A  
INFORMATIONAL BROCHURE



GRANITE BAY WEALTH MANAGEMENT, LLC

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March 25, 2026

**This brochure provides information about the qualifications and business practices of Granite Bay Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 888.610.8881 or 603.610.8881. 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. Our registration does not imply a certain level of skill or training.**

**Additional information about Granite Bay Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Statement of Material Changes**

Granite Bay Wealth Management, LLC is required to disclose any material changes to this ADV Part 2A here in Item 2. There have been no material changes since the last filing on October 21, 2025.

**Item 3: Table of Contents**

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## INFORMATIONAL BROCHURE

### GRANITE BAY WEALTH MANAGEMENT, LLC

#### **Item 4: Advisory Business**

A. Granite Bay Wealth Management, LLC (GBWM) has been in business as an investment advisor since 2015, though its principals, Joseph R. Skees and Paul S. Stanley have each been in the business of providing investment advice for more than 25 years. Mr. Skees and Mr. Stanley rendered investment advice under the trade name of Granite Bay Wealth Management, LLC, while still affiliated with their prior firm. The firm is owned by Solara Technologies, Inc.

B. GBWM seeks to provide clients with a thoughtful, client-centered approach toward asset management and financial planning. In addition, GBWM provides investment consulting services to qualified plans and plan sponsors.

#### Asset Management

GBWM's client centered approach to asset management begins with investigative client consultation. A representative of GBWM will meet with the client to determine needs and goals, risk tolerance, and any investment restrictions or preferences. This process includes a risk profile that aids in the discovery of the client's actual risk profile. In some cases, the results of this profile differ from a client's stated tolerances, or even what their age or other circumstances would traditionally indicate as an appropriate risk level. Once this is completed, GBWM researches various investment options for the client based on the client's current investments and risk profile and prepares an asset allocation that will serve as a guideline for the client's ongoing investments. For the duration of the relationship, GBWM continues to communicate with the client to ensure that the client's objectives and asset allocation remain optimal for the client's evolving circumstances.

Many clients choose to work with GBWM on both asset management and financial planning, where both services are seamlessly integrated. All asset management clients whose assets are in excess of our minimum \$500,000 account size, may upon request, receive financial planning services as part of their asset management services. In the alternative, clients may choose to work with GBWM for financial planning services on a stand-alone basis, without utilizing GBWM ongoing asset management services, pursuing the financial planning process separately.

In very limited circumstances, GBWM may provide asset management services on a non-discretionary basis. Assets are managed with the same process, but clients are consulted prior to the implementation of recommendations.

#### Financial Planning

When working with GBWM on financial planning, clients will be led through a series of steps designed to ensure that each client's process is similar, yet the results unique. The process begins with a clear definition between GBWM and the client of each party's responsibilities. This definition is memorialized in a written agreement. GBWM will gather and analyze information, but the firm will not be able to accurately perform their obligations unless the client provides complete and accurate

information. Thereafter, GBWM will interview the client and gather documents from the client which will allow the firm to identify the client's ultimate financial goals and also develop an outline of the client's current financial circumstances. Once the current circumstances and future circumstances are determined, GBWM will analyze this information in order to determine potential paths toward reaching that particular client's goals and ultimately present these options and recommendations to the client.

For clients receiving a complete financial plan on a stand-alone basis, the process results in a financial planning document that identifies and explains the recommendations. Planning services that are limited to a specific aspect of a client's financial life may not warrant a plan document, but results and recommendations will be reviewed with a GBWM professional. In either case, it is the client's choice whether to follow the recommendations, and if they choose to do so, whether they will seek assistance from GBWM in implementing the recommendations. Clients who elect to work with GBWM for financial planning and asset management services will have the benefit of GBWM leading an integrated process, whereby financial planning and the direction of asset management are combined, and thus a separate planning document not created. This integration includes the management of the assets identified in the plan in accordance with the directives of the plan, and an ongoing review of the client's goals and maintaining a portfolio that is in keeping with those goals. Asset management processes are described more fully in Item 8 of this brochure.

Subject matters raised will include some or all of the subject fields identified by the Certified Financial Planner Board's Standards of Professional Conduct, which include financial statement preparation and analysis, risk management, employee benefits, investments, income taxes, retirement, and estate planning. Frequently, a thorough financial plan will require the assistance of other professionals in implementation. Because GBWM's professionals are neither attorneys nor accountants, no part of their services include tax or legal advice but they may provide education on tax topics related to investments. However, an attorney may be required for the purpose of executing an estate plan, or an accountant needed for additional tax consultation. If requested, GBWM will provide a recommendation for such a professional, but the client is under no obligation to accept that recommendation. GBWM does not receive any sort of referral fees from professionals it recommends. If you engage any professional recommended by GBWM, and a dispute arises thereafter relative to such engagement, you agree to seek recourse exclusively from and against the engaged professional.

#### Retirement Plan Consulting Services

The fiduciaries of self-directed retirement plans (which can include 401(k) plans) are required to, among other things, determine a selection of investments from which the plan's participants choose for their personal allocation in their individual participant account. GBWM provides assistance to plan sponsors in meeting this obligation through a consultative relationship, which includes the selection of the plan investment options in accordance with the plan's objectives, as well as the ongoing monitoring of those options to assist the plan sponsor in determining when changes to these options are needed. This advice is rendered on a non-discretionary basis, meaning the plan sponsor is free to accept or reject GBWM's recommendations.

#### Annuities

Legacy variable annuities will be held by Mutual Group.

- C. All engagements are tailored to the specific needs of an individual client. GBWM does not use “model” portfolios where all clients in the model contain the exact same investments. Clients may place reasonable restrictions on the management of assets, including regarding specific securities or types of securities. However, clients should understand that significant restrictions cannot only decrease the ability of GBWM to meet the client’s goals, but also increase the costs associated with managing the client’s portfolio.
- D. GBWM neither participates in, nor sponsors a wrap fee program.
- E. As of December 31, 2025, GBWM managed \$587,972,490 in client assets including \$574,454,796 on a discretionary basis.

**Item 5: Fees and Compensation**

A. Fees Charged

Financial Planning – Stand Alone

Clients who are engaging GBWM for financial planning services without asset management services will do so on an hourly basis. Hourly rates range from \$300 – \$400, depending upon the professional rendering the service. An estimate of total hours to complete the assignment will be determined at the start of the engagement. The estimate is subject to change, depending upon the circumstances that arise during the engagement. Fees are negotiable and will depend on the anticipated complexity of your plan.

Asset Management

GBWM’s asset management fees are based on a percentage of the gross market value of a client’s assets managed by GBWM, and the fee range generally varies from 0.50% to 1.50% on an annual basis. Fees are negotiable, and may be higher or lower, based on the nature of the account, and the origin of the client, as many clients that have worked with GBWM’s professionals in the past and may continue with the fee percentages imposed by the principal’s prior firms. Other factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of GBWM), GBWM may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client and disclosed prior to services rendered.

Retirement Plan Consulting Services

Generally, GBWM’s Retirement Consulting (asset management) fees are based on a percentage of the gross market value of a plan’s assets managed by GBWM. Fees are negotiable and will be determined by the scope and nature of the services provided, the size of the account, the complexity of the plan document and other factors. Services may also be performed on an hourly basis in limited

circumstances.

Clients should be advised that some clients will not be charged fees for services provided by GBWM. These pro-bono clients may be family members, charitable groups, smaller accounts connected to larger, fee-paying clients, or other clients at our discretion.

### Annuities

Annuities held at Mutual Group will pay trails ranging from 0.25% to 1.0% per annum of the market value of the client's assets at Mutual Group, paid directly to Mutual Group.

### B. Fee Payment

#### Financial Planning

Generally, fifty percent (50%) of the anticipated financial planning fee will be payable upon signing the Financial Planning Agreement, with the remainder due upon completion of the financial plan. For hourly engagements, the final amount due will be based upon actual hours expended. For fixed fee engagements, the final amount due will be fifty percent (50%) of the fixed fee.

#### Asset Management

Asset management fees may be paid via a direct debit from a client account, or by some other mutually agreeable method. All asset management fees will be calculated on a quarterly basis, in advance, and the value used will be the gross asset value as of the last market day of the previous quarter. The "gross" asset value relates to the limited number of clients who, at their own election, choose to have margin accounts, which may increase the amount of assets through borrowing. This means that if your annual fee is 1.00%, then each quarter we will multiply the value of your account by 1.00%, then divide 4 to calculate our fee. For assets deposited into or withdrawn from an account after the inception of a billing period, the fee payable is prorated based on the number of days remaining in the billing period. Any adjustments in fees related to the withdrawal of assets in an account will be credited against the next billing period's investment advisory fees. Additionally, to the extent there is cash in a client's account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. Clients selecting to pay fees in another method will remit payment to GBWM separately.

The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. For clients electing to have fees directly debited from an account, those fees will be debited from the account(s) designated by the client. Clients may elect to have fees for each account paid by that account or paid by another account. Once the fee calculation is made, GBWM will instruct the account custodian to deduct the fee from the applicable account(s) and remit that fee to GBWM.

Clients selecting to pay fees in another method will remit payment to GBWM separately. All invoices are due upon receipt. GBWM reserves the right to discontinue services for non-payment of fees.

### C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. GBWM can provide or direct you to a copy of the prospectus for any fund that we recommend to you. Effective October 7, 2019, Schwab eliminated commissions for online trades of U.S. equities, ETFs, and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, you will not have to pay any commissions to Schwab.

As described in Item 4 Advisory Business, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds® and Laudus Funds® that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from third-party ETFs that participate in the Schwab ETF OneSource™ program and mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage account for services Schwab provides; and (iv) remuneration Schwab may receive from the market centers where it routes ETF trade orders for execution.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata Fees*

If a client engages GBWM to provide asset management services during a billing quarter, the fees for that quarter will be pro-rated according to the number of days left until the next quarter. Likewise, if a client terminates services during a quarter, the client will receive a refund for fees collected in advance but related to services that would have been provided from the date of termination through the end of the billing quarter. In either case, GBWM will calculate the total fee that would be due for the quarter, divide the fee by the number of days in the quarter to arrive at a daily rate, count the number of days the client was or will be a client during that quarter (as applicable) and multiply that number by the daily rate. GBWM will cease to perform services, including processing trades and distributions, upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to GBWM and will become a retail account with the custodian.

E. *Compensation for the Sale of Securities*

This is not applicable.

**Item 6: Performance-Based Fees & Side by Side Management**

GBWM will not charge performance-based fees.

**Item 7: Types of Clients**

Clients advised include individuals, trusts, charitable organizations, corporations and ERISA plans and their sponsors. GBWM requires each client to place at least \$500,000 with the firm. This minimum may be waived in the discretion of GBWM.

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

It is important for clients to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

A. Methods of Analysis and Strategies

Each client's portfolio is created through the evaluation of the client's needs that in some cases takes place during a financial planning process. For those clients who have not engaged GBWM to provide financial planning services, portfolio construction originates with an evaluation of each client's investment objectives as well as the client's risk tolerance. Risk tolerance is determined through a client driven questionnaire. Both sources are part of developing a portfolio that takes into consideration the client's investment horizons, ability, and desire to withstand the volatility that can come with investing, and overall goals for each specific portfolio. Where possible, GBWM prefers to include financial planning as part of the asset management process to ensure that all client objectives are being considered. Whether a slow evolution or via a life event, the planning process is designed to thoughtfully incorporate these changes into the investments in the client's portfolio. GBWM wants this process to be a fully cooperative one, and therefore clients of all account sizes are advised to keep GBWM informed of changes in financial circumstances, as these changes could affect the client's asset allocation and financial plan. Additionally, part of the GBWM process may include, where appropriate, involving multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. GBWM attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent.

Because GBWM believes that asset allocation is the single most important factor in determining the long-term results for a client, determining an asset allocation is of paramount importance. GBWM describes for clients three basic asset allocation approaches: Conservative, Moderate, Strategic Growth and Aggressive. Each approach is designed to carry a different amount of volatility, and potentially different ways of limiting that volatility, depending on the market conditions at the time. For example, a Conservative portfolio is one where the exposure to asset classes that are particularly prone to volatility, such as stocks, is limited, so that an investor with a Conservative portfolio should not experience the same swings in value as the overall equity markets. An Aggressive portfolio is one where volatility is not of the same concern, as an Aggressive investor is likely to be one with a significantly longer time horizon for investing than their Conservative counterpart. The Moderate approach is a continuum between Conservative and Aggressive. The Strategic Growth Portfolio is designed for investors seeking long-term capital appreciation through a well-balanced mix of industry leaders and high-growth opportunities.

It is important to note that the asset allocation approaches are not “models” in the sense that clients are not grouped into each approach and always traded together without consideration for each client’s specific needs and restrictions. Rather, they assist in expressing to clients how asset allocation, volatility, time horizon, and goals meet and together create a portfolio.

The specific securities in each of the four approaches above, and in turn client accounts, are determined by GBWM’s view of each type of exposure and its current place in each type of portfolio. GBWM refers to certain asset categories which will comprise each portfolio in differing amounts.

These include, but are not limited to:

Stocks:

- U.S. Large Cap Value
- U.S. Large Cap Growth
- U.S. Small Cap Value
- U.S. Small Cap Growth
- International Developed Market
- International Emerging Market

Bonds:

- U.S. Government Agencies/Treasuries
- Inflation-Adjusted
- U.S. High Rated Corporate
- U.S. Low Rated Corporate
- International Developed Market
- International Emerging Market

It may be a traditional belief that an emerging market mutual fund or Exchange Traded Fund (otherwise known as an “ETF”) would be inappropriate for a client using the Conservative approach. However, GBWM believes that proper portfolio construction involves not only diversification but limiting exposure to assets or asset classes that are highly correlated to one another (meaning that they will behave in a similar manner in similar conditions, thus actually increasing risk). While GBWM is prepared to render advice with regard to any security type, in choosing specific securities GBWM generally recommends mutual funds and ETFs. GBWM may also recommend the use of options for some client portfolios. In some circumstances the choice between a mutual fund and an ETF is whether GBWM believes there is value added in that particular asset class and specific fund, to the mutual fund’s advisor’s active management of that fund, as opposed to an ETF which is not actively managed. ETFs may have lower overall costs, but active management can be beneficial, which is why the evaluation of securities for client accounts includes specific consideration as to the balance of being cost-effective with potential added value. Separately, the Strategic Growth Portfolio maintains a sector-diverse allocation ensuring exposure to both established blue-chip companies and innovative disruptors. Our investment approach integrates technical analysis that attempts to optimize entry and exit points, mitigate downside risk, and enhance overall returns. This portfolio follows an equal-weight strategy, ensuring that no single holding dominates performance. With a disciplined approach to technical analysis and market trends, this portfolio targets growth opportunities with a data-driven strategy.

GBWM may also recommend the use of options for some client portfolios with common strategies such as:

1. Sell a covered call (buy/write). We buy a security and sell a call. We have the potential of capital appreciation up to the limit of the strike price, but we collect upfront income from selling the call. We also collect any dividends paid over time.

2. Sell puts secured by cash, treasuries, or margin. We view this as the most conservative of the approaches. Instead of buying the security at the current price, we sell a put agreeing to buy the security at a lower price over a certain time period and collect option income for that trade. If the underlying security declines to the strike and an investor now buys the security, then it was better for the investor to be paid option income to buy a security at a lower price than simply buying the security at the inception however, there is no opportunity for capital appreciation with share price increases and a put seller also cannot collect dividends.

3. Sell solo puts, spreads, and/or iron condors through Index options. Index options are contracts that have a benchmark index, such as the S&P 500, as its underlying asset as opposed to equity options which are contracts that give the holder (buyer of the option) the right, but not the obligation, to either buy or sell a security at a set strike price on or prior to the contract's expiration date.

4. Buy a deep-in-the-money LEAPS call. Long calls carry risks that can result in 100% losses. However, we mitigate some of that risk by buying a call options which expire further into the future. Expiration dates are longer than one year (often two years), giving us extended time for the underlying security to increase or to close out the call and limit downside. We intentionally set the strike price very low – often half of the price as the underlying security, allowing us to reach a breakeven faster. There is no income collected from options or dividends when using this strategy. There is great opportunity for leveraged growth if the underlying security's share price increases.

Part of the security selection process is also the consideration of what assets the client already has in the portfolio. Clients may come to GBWM with a variety of investments, with a variety of custodians. Where possible and advisable, GBWM will advise the transfer of assets in-kind, meaning the asset will not be sold before the account is moved to the custodian under GBWM's advisement. Some securities may be kept in the portfolio because of tax issues or other costs associated with a transition. To the extent these securities are not sold, GBWM will attempt to build a portfolio taking these securities into consideration and advise the client if there are additional risks associated with keeping a specific security.

## B. Material Risks

GBWM's primary strategies do not include frequent trading of securities. It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.

- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that while GBWM does not consider short-term trading a strategy for its clients, trades may be made with frequency if conditions and client goals merit it. These transactions may result in short-term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long-term strategies. GBWM endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Margin Risk.** "Margin" is typically used to maximize returns on a given investment by using securities in a client account as collateral for a loan from the custodian to the client. The proceeds of that loan are then used to buy more securities. In a positive result, the additional securities provide additional return on the same initial investment. In a negative result, the additional securities provide additional losses. Margin, therefore, carries a higher degree of risk than investing without margin. Any client account that will use margin will do so in accordance with Regulation T. GBWM only recommends the use of margin as part of its portfolio construction process when the client has an allocation to options. In such circumstances, margin is used only on a temporary basis to secure an option transaction. However, clients may on occasion wish to utilize margin to facilitate some other need or goal. In these cases, the margin will increase the value of the assets in the account, which means the management fees calculated, which are based on account value, will also increase.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an advisor who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research, is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the advisor to reach satisfactory investment conclusions.
- **Options.** The use of options transactions as an investment strategy involves a high level of inherent risk. Although the intent of many of the options-related transactions implemented by GBWM is to hedge against principal risk, certain options-related strategies (i.e., straddles, short positions, etc.), may in and of themselves produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies.

Clients participating in an options strategy should *carefully* consider all information regarding the strategy and its risks prior to participating.

- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small is also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk.** While GBWM selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition Risk.** As assets are transitioned from a client's prior advisors to GBWM, there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Where possible, GBWM will maintain securities that come from the client's existing accounts and will not sell a security merely to push the portfolio into line with other accounts GBWM manages. However, in some instances, selling a security is advisable despite costs. GBWM's goal is to minimize costs, which means that the overall transition process to GBWM may take some time as cost considerations are compared with client needs. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of GBWM may adversely affect the client's account values, as GBWM's recommendations may not be able to be fully implemented.
- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns. In addition, significant restrictions may lead to GBWM needing to increase the management fee rate.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had if the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

### C. Security Types

As discussed above, GBWM primarily recommends mutual funds and ETFs. However, GBWM may also utilize stocks, bonds, exchange-traded notes (ETNs), Real Estate Investment Trusts (REITs), and/or options.

## Risks Associated with Securities

**Exchange Traded Funds:** Prices may vary significantly from the Net Asset Value due to market condition. 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.

**Mutual Funds:** 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). When selecting mutual funds that have multiple share classes for recommendation to clients, the Adviser will take into account the internal fees and expenses associated with each share class, as it is our policy to choose the lowest-cost share class available, absent circumstances that dictate otherwise.

**Equity Securities:** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

**Fixed Income:** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by the Fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

**Real Estate Investment Trust (REIT):** A REIT is an entity, typically a trust or corporation that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income, and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some

increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.

**Exchange Traded Notes (ETNs):** ETNs are unsecured debt obligations issued by a financial institution, usually a bank. Terms—including return rates and maturity dates—are set by the bank. Like bonds, ETNs can be traded or held until maturity. When an ETN is launched, a maturity date is set—typically between 10 and 30 years. ETNs may offer investors greater tax efficiency and make it easier to access certain types of trading strategies, such as commodities and volatility exposure. With that efficiency and access come greater risks, including counterparty credit risk and illiquid trading.

**Cryptocurrency:** For clients who request exposure to cryptocurrencies, including Bitcoin, GBWM will consider investment in a corresponding exchange traded securities and/or private funds that provide cryptocurrency exposure. Crypto is a digital currency that can be used to buy goods and services but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications with codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not controlled or regulated, and their price is determined by the supply and demand of their market. Cryptocurrency is currently considered to be a speculative investment. Please Note: Investment in cryptocurrencies is subject to the potential for liquidity constraints, extreme price volatility, and complete loss of principal.

**Item 9: Disciplinary Information**

There are no disciplinary items to report.

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

A. Broker-dealer

Neither the principals of GBWM, nor any related persons are registered, or have an application pending to register, as a broker dealer or as an associated person of the foregoing entities.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither GBWM nor the principals of GBWM, nor any related persons are registered, or have an

application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

Some individuals associated with GBWM are separately licensed as an independent insurance agent. As such, these individuals may conduct insurance product transactions for GBWM, in their capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received through GBWM. This means that when making financial planning recommendations, these GBWM professionals may recommend that a client purchase insurance products, which can be purchased through that same professional for a commission. The receipt of additional compensation for insurance commissions is a conflict of interest, and clients should be aware of this conflict when considering whether to engage GBWM or utilize a GBWM professional to implement any insurance recommendations. GBWM attempts to mitigate this conflict by disclosing the conflict verbally and in this brochure, as well as requiring all employees to confirm their fiduciary responsibility to each client.

D. Recommendations of other Advisors

For annuity products, GBWM provides access to Mutual Group's platform. You are under no obligation to use Mutual Group's service. The annuity products and fee structures available from Mutual Group may differ from those available from other third-party annuity agents. GBWM recommends that you fully evaluate products and fee structures to determine which arrangements are most favorable to you prior to making an investment decision.

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

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. This item is not applicable. GBWM does not recommend to clients that they invest in any security in which GBWM or any principal thereof has any financial interest.

C. On occasion, an employee of GBWM may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

**Item 12: Brokerage Practices**

A. Recommendation of Broker-Dealer

GBWM does not maintain custody of client assets, though GBWM may be deemed to have custody if a client grants GBWM authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. GBWM recommends that investment accounts be held in custody by either Schwab Advisor Services (“Schwab”) or Altruist Financial LLC (“Altruist”), which are both qualified custodians, but also may recommend other custodians if the specific client’s needs merit such a recommendation.

### **Schwab**

GBWM is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when GBWM instructs them to, which GBWM does in accordance with its agreement with you. While GBWM recommends that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. GBWM does not open the account for you, although GBWM may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, CS&Co, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co as custodian/broker to enroll in the Program, you will decide whether to do so and will open your account with CS&Co. by entering into an account agreement directly with them. We do not open the account for you. If you do not wish to place your assets with CS&Co, then we cannot manage your account through the Program. CS&Co may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

### **How we select brokers/custodians**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (i.e., costs) and qualitative (execution, reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian refers clients to GBWM as part of our evaluation of these broker-dealers.

### **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. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer, but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your

trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

### **Products and services available to us from Schwab**

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like GBWM. They provide GBWM and our clients with access to its 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 GBWM manage or administer our clients’ accounts, while others help GBWM manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to GBWM. 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
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party’s fees. Schwab may also provide us with other benefits,

such as occasional business entertainment of our personnel.

### **Our interest in Schwab's services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. With respect to the Program, as described above under Item 4 Advisory Business, we do not pay SPT fees for its services in connection with the Program so long as we maintain \$100 Million in client assets in accounts at CS&Co that are not enrolled in the Program. We may have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

### **Altruist**

GBWM also offers investment advisory services through the custodial platform offered by Altruist Financial LLC ("Altruist"), an unaffiliated SEC registered broker dealer and FINRA/SIPC member. Custody, clearing, and execution services are provided by Altruist Financial LLC as a self-clearing broker-dealer. GBWM's clients establish brokerage accounts through Altruist. GBWM maintains an institutional relationship with Altruist whereby Altruist provides certain benefits to GBWM, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit GBWM and its clients. GBWM is not affiliated with Altruist. Altruist does not supervise GBWM, its agents, activities, or its regulatory compliance.

GBWM may subscribe select client accounts to participate in the Altruist One Program ("Altruist One") offered by Altruist Corp, the parent company of Altruist Financial LLC, a SEC registered broker dealer and FINRA/SIPC member and Altruist LLC, an SEC-registered investment adviser (collectively, "Altruist" ). Under this program, GBWM may enroll client account(s) into a bundled subscription offering that provides certain benefits in exchange for a monthly fee.

The monthly fee can be either absorbed by GBWM or passed to GBWM's client(s) subscribed to Altruist One. The cost and fee calculation methodology are detailed in the *Altruist One Terms of Use*, which is available on [altruist.com/legal](http://altruist.com/legal) (<http://altruist.com/legal>).

Benefits provided under this program may include:

- Higher interest rates on cash balances.
- Waived or discounted transaction fees for mutual funds, fixed income, and other securities.
- Waived or discounted fees for automated tax management tools. Waived or discounted fees to access model portfolios.

Only clients enrolled in Altruist One will have access to these benefits. Altruist One may not be suitable for all clients of GBWM. For more information, please contact GBWM.

### **Directed Brokerage**

GBWM will, on occasion, allow directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and GBWM will not seek better execution services or prices from other broker-dealers or be able to “batch” the client's transactions for execution through other broker-dealers with orders for other accounts managed by GBWM. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

We do not consider whether Schwab or any other broker-dealer/custodian refers clients to GBWM as part of our evaluation of these broker-dealers.

#### **B. Aggregating Trades**

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence. (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.) Schwab does not provide GBWM clients with a decreased commission rate for aggregated trades.

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

- A. All accounts will be reviewed by a senior professional on at least a quarterly basis.
- B. It is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger an additional review.
- C. Clients will receive written reports (which may be delivered, with client consent, electronically via GBWM's web portal) on at least a quarterly basis which will include information related to portfolio performance, the market conditions during the quarter and future market outlook.

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

- A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

GBWM receives an economic benefit from Schwab in the form of support products and services it makes available to GBWM and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit the firm, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability of Schwab's

products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

**B. Compensation to Non-Advisory Personnel for Client Referrals.**

GBWM has entered into solicitation agreements with MoneyPickle, SmartAsset and WiserAdvisor pursuant to which it compensates these third-party intermediaries for client referrals that result in the provision of investment advisory services by GBWM. GBWM will disclose these solicitation arrangements to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-1 under the Advisers Act. Solicitors introducing clients to GBWM may receive compensation from GBWM, such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such compensation will be paid pursuant to a written agreement with the solicitor and generally may be terminated by either party from time to time. The cost of any such fees will be borne entirely by GBWM and not by any affected client.

**Item 15: Custody**

Under government regulations, GBWM is deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account or we act pursuant to a Standing Letter of Authorization (“SLOA”) or similar instrument. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by GBWM against the information in the statements provided directly from Schwab. Please alert us to any discrepancies.

In addition to the account custodian’s custody procedures, clients issuing SLOAs are requested to confirm, in writing, that the accounts to which funds are distributed are parties unrelated to GBWM.

**Item 16: Investment Discretion**

Please see Item 8, which describes GBWM’s approach to asset management.

GBWM manages accounts on a discretionary basis. This means that GBWM will make decisions and implement those decisions to buy, sell, or hold securities, cash, or other investments without consulting with the client before implementation. This discretion is limited, in that we will only implement recommendations that meet a client’s investment objectives. Clients will be required to execute an agreement with GBWM and account opening documents with the custodian granting a limited power of attorney to GBWM for the purpose of trading in the account. As discussed in Item 8, clients may place reasonable restrictions on the management of their accounts.

**Item 17: Voting Client Securities**

**A.** Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds, or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. GBWM will not accept authority to vote client securities.

B. Clients will receive their proxies directly from the custodian for the client account. GBWM will not give clients advice on how to vote proxies.

**Item 18: Financial Information**

GBWM does not require the prepayment of fees more than six (6) months or more in advance and, therefore, has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

Item 1: Cover Sheet

FORM ADV PART 2B

**Paul S. Stanley**



GRANITE BAY WEALTH MANAGEMENT, LLC

Main Office:

22 Deer Street, Suite 200

Portsmouth, NH 03801

888.610.8881

603.610.8881

**March 25, 2026**

**This Brochure Supplement provides information about Paul S. Stanley that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about Paul S. Stanley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**Paul S. Stanley**

**Born: 1974**

**EDUCATION:**

Bentley College, B.S. in Finance & Economics, 1996

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC  
Financial Advisor, 10/2025 – present  
Managing Partner, 01/2006 – 10/2025

UBS Wealth Management  
Account Vice President, 09/2001 – 01/2006

Merrill Lynch  
Financial Consultant, 06/1998 – 09/2001

**PROFESSIONAL DESIGNATIONS**

**CERTIFIED FINANCIAL PLANNER® professional**

Individuals who are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, may refer to themselves as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and may use these and the other certification marks (the “CFP Board Certification Marks”) that Certified Financial Planner Board of Standards Center for Financial Planning, Inc. has licensed to CFP Board in the United States. The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials. CFP Board implemented the bachelor’s degree or

higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

#### Certified Portfolio Manager (CPM®)

The Certified Portfolio Manager (CPM®) designation is a collaboration of the Academy of Certified Portfolio Managers and NYU Stern. The academic component is designed to provide a deeper understanding of fundamental security analysis, asset allocation, and portfolio management concepts for financial services industry professionals managing discretionary portfolios.

The curriculum encompasses eight core concepts:

- Quantitative Methods
- Financial Statement Analysis
- Corporate Finance
- Fixed Income Analysis
- Equity Analysis
- Fiduciary Responsibility
- Derivatives
- Portfolio Management

To attain the CPM® certification, ACPM members are required to complete two components:

- a) 150-200 hours of independent study and a
- b) week-long residential program hosted by the Business and Finance Department at NYU Stern.

CPM® Graduate Requirements:

At the end of each calendar year, CPM Graduate members are required to submit the following:

1. Record of 20 completed continuing education hours. ACPM maintains a self-auditing continuing education policy.
2. Answers to a series of Professional Conduct questions.
3. Annual membership dues.

#### Certified in Financial Forensics (CFF®)

The Certified in Financial Forensics (CFF) is a credential that demonstrates expertise in forensic accounting. It's issued by the American Institute of Certified Public Accountants (AICPA) in the United States.

The CFF credential demonstrates your expertise in:

- Fraud detection, prevention and response
- Financial statement misrepresentation
- Digital forensics
- Bankruptcy and insolvency
- Damages calculations and dispute resolution
- Expert witness services
- Investigations
- Family law services

#### **Requirements:**

- Maintain AICPA membership in good standing
- Hold a valid and unrevoked CPA license or qualified equivalent
- Pass the CFF examination
- Attest to meeting the minimum business experience and continuing professional development (CPD) requirements

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Stanley.

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

Mr. Stanley is separately licensed as an independent insurance agent. As such, Mr. Stanley may conduct

insurance product transactions for GBWM clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an employee of GBWM. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Stanley therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage GBWM or utilize Mr. Stanley to implement any insurance recommendations. GBWM attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with GBWM, or to determine not to purchase the insurance product at all. GBWM also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of GBWM, which requires that employees put the interests of clients ahead of their own.

Effective March 14, 2023, Mr. Stanley was named a Town Selectman for Greenland, NH for the general operations of the town government. This activity does not interfere with Mr. Stanley's advisory services nor are there any conflicts of interest with his activities at Granite Bay Wealth Management.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Stanley does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

Mr. Stanley receives a modest stipend for his role as Town Selectman.

**Item 6: Supervision**

Mr. Stanley is a principal of GBWM, and as such has no direct supervisor. However, all employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Joseph Skees is the Chief Compliance Officer at GBWM. Mr. Skees may be reached via telephone at 888-610-8881.

Item 1: Cover Sheet

FORM ADV PART 2B

**Joseph R. Skees**



GRANITE BAY WEALTH MANAGEMENT, LLC

Main Office:

22 Deer Street, Suite 200

Portsmouth, NH 03801

888.610.8881

603.610.8881

**March 25, 2026**

**This Brochure Supplement provides information about Joseph R. Skees that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about Joseph R. Skees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**Joseph R. Skees**

**Born: 1972**

**EDUCATION:**

University of Massachusetts Dartmouth, B.S. in Business Management, 1994

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC

Financial Advisor, Chief Compliance Officer, 10/2025 – present

Managing Partner & Chief Compliance Officer, 01/2006 – 10/2025

UBS Wealth Management

Account Vice President, 09/2001 – 01/2006

Merrill Lynch

Financial Consultant, 11/1999 – 09/2001

**PROFESSIONAL DESIGNATIONS**

**CERTIFIED FINANCIAL PLANNER® professional**

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CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials. CFP Board implemented the bachelor’s degree or

higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

#### Chartered Life Underwriter® (CLU)

Since 1927, the CLU® has been the respected risk management credential for advisors. Designees have completed eight or more college-level courses representing an average study time of 400 hours. Topics for required courses include insurance and financial planning, life insurance law, estate planning, and planning for business owners and professionals. Elective courses include such advanced topics as income taxes, group benefits, retirement planning, and health insurance. CLU® designees must meet experience and continuing education requirements and must adhere to a high ethical standard. The mark is awarded by The American College, a non-profit educator with the top level of academic accreditation.

#### Chartered Financial Consultant® (ChFC)

The ChFC® designation has been a mark of excellence for almost thirty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

### Certified Employee Benefits Specialist (CEBS)

The Certified Employee Benefits Specialist (CEBS) program is jointly developed and administered by the International Foundation of Employee Benefit Plans and the Wharton School of the University of Pennsylvania. This is a non-accredited program. To attain the CEBS designation, the candidate must complete and pass eight college level courses that offer comprehensive understanding of employee benefit concepts and principles. The designation holder must also complete 30 hours of continuing education on a biennial basis.

### Certified Portfolio Manager (CPM®)

The Certified Portfolio Manager (CPM®) designation is a collaboration of the Academy of Certified Portfolio Managers and NYU Stern. The academic component is designed to provide a deeper understanding of fundamental security analysis, asset allocation, and portfolio management concepts for financial services industry professionals managing discretionary portfolios.

The curriculum encompasses eight core concepts:

- Quantitative Methods
- Financial Statement Analysis
- Corporate Finance
- Fixed Income Analysis
- Equity Analysis
- Fiduciary Responsibility
- Derivatives
- Portfolio Management

To attain the CPM® certification, ACPM members are required to complete two components:

- a) 150-200 hours of independent study and a
- b) week-long residential program hosted by the Business and Finance Department at NYU Stern.

CPM® Graduate Requirements:

At the end of each calendar year, CPM Graduate members are required to submit the following:

1. Record of 20 completed continuing education hours. ACPM maintains a self-auditing continuing education policy.
2. Answers to a series of Professional Conduct questions.
3. Annual membership dues.

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Skees.

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

Mr. Skees is separately licensed as an independent insurance agent. As such, Mr. Skees may conduct insurance product transactions for GBWM clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an employee of GBWM. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Skees therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage GBWM or utilize Mr. Skees to implement any insurance recommendations. GBWM attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with GBWM, or to determine not to purchase the insurance product at all. GBWM also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of GBWM, which requires that employees put the interests of clients ahead of their own.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Skees does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

**Item 6: Supervision**

Mr. Skees is a principal and the Chief Compliance Officer of GBWM, and as such has no direct supervisor. However, all employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered.

Item 1: Cover Sheet

FORM ADV PART 2B

**Joshua I. Bartlett**



GRANITE BAY WEALTH MANAGEMENT, LLC

Main Office:

22 Deer Street, Suite 200  
Portsmouth, NH 03801

888.610.8881  
603.610.8881

**March 25, 2026**

**This Brochure Supplement provides information about Joshua I. Bartlett that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about Joshua I. Bartlett is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**Joshua I. Bartlett**

**Born: 1979**

**EDUCATION:**

Northeastern University, B.S. in Behavioral Neuroscience, 2003

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC

Financial Advisor, 10/2025 – present

Investment Adviser Representative, 01/2020 – 10/2025

Accolade Financial, LLC

Managing Member, 10/2014 – Present

Cambridge Investment Research Advisors, Inc.

Investment Adviser Representative, 10/2017 – 06/2018

Flagship Harbor Advisors, LLC

Investment Adviser Representative, 8/2016 – 10/2017

**PROFESSIONAL DESIGNATIONS**

Certified College Planning Specialist (CCPS)

The CCPS provides advisors with the knowledge and resources to assist families in reducing the financial impact of sending children to college. The CCPS is issued by the National Institute of Certified College Planners. Pre-requisites of the CCPS designation require the designee to hold either a professional financial certification/designation, hold a professional financial license (securities, insurance, accounting etc.) or a combination of education and experience deemed satisfactory by the NICCP Advisory Council. The designee is required to complete three self-study modules with a final exam after each module. In addition, the designee is required to complete 16 hours of continuing education each year.

**Item 3: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Bartlett.

**Item 4: Other Business Activities**

Mr. Bartlett is separately licensed as an independent insurance agent. As such, Mr. Bartlett may conduct insurance product transactions for GBWM clients, in his capacity as a licensed insurance agent, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as an employee of GBWM. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. Mr. Bartlett therefore has an incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage GBWM or utilize Mr. Bartlett to implement any insurance recommendations. GBWM attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with GBWM, or to determine not to purchase the insurance product at all. GBWM also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of GBWM, which requires that employees put the interests of clients ahead of their own.

Mr. Bartlett is engaged in college funding counseling through Accolade Financial, LLC. Accolade Financial, LLC is not affiliated with GBWM beyond and Mr. Bartlett is the sole owner of Accolade Financial, LLC. As such, Mr. Bartlett may conduct college funding planning services for GBWM clients, in his capacity as an independent consultant and may receive compensation for these services in addition to any compensation received in his capacity as an employee of GBWM. Compensation from the delivery of these services will not be used to offset or as a credit against advisory fees. Mr. Bartlett therefore has an incentive to recommend his consulting services based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for consulting services is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage GBWM or utilize Mr. Bartlett to conduct any college funding planning services. GBWM attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to engage other professionals that are not affiliated with GBWM. GBWM also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of GBWM, which requires that employees put the interests of clients ahead of their own.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Bartlett does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

**Item 6: Supervision**

Mr. Bartlett reports to the principals of the firm, and also the firm's Chief Compliance Officer, Joseph Skees. All employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Mr. Skees may be reached via telephone at 888-610-8881.

Item 1: Cover Sheet

FORM ADV PART 2B

**Bryan T. Monteverde**



GRANITE BAY WEALTH MANAGEMENT, LLC

Main Office:

22 Deer Street, Suite 200

Portsmouth, NH 03801

888.610.8881

603.610.8881

**March 25, 2026**

**This Brochure Supplement provides information about Bryan T. Monteverde that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about Bryan T. Monteverde is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**Bryan T. Monteverde**

**Born: 1986**

**EDUCATION:**

University of Pittsburgh at Johnstown, B.S. in Business Finance, 2010

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC  
Financial Advisor, 10/2022 – present

Divorce Outcomes, LLC  
Financial Consultant, 01/2020 – 10/2022

Bank of New York Mellon  
Private Banker/Closely Held Business Manager, 01/2012 – 12/2019

**Item 3: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Monteverde.

**Item 4: Other Business Activities**

Mr. Monteverde does not participate in outside business activities.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Monteverde does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

**Item 6: Supervision**

Mr. Monteverde reports to the principals of the firm, and also the firm's Chief Compliance Officer, Joseph Skees. All employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Mr. Skees may be reached via telephone at 888-610-8881.

Item 1: Cover Sheet

FORM ADV PART 2B

## Trevor Stanley Simon



GRANITE BAY WEALTH MANAGEMENT, LLC  
216 Eureka Street  
San Francisco, CA 94114

888.610.8881  
603.610.8881

March 25, 2026

**This Brochure Supplement provides information about Trevor Stanley Simon that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about Trevor Stanley Simon is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**Trevor Stanley Simon**

**Born: 2000**

**EDUCATION:**

University of Arizona, 8/2018 – 5/2021, Area of Study: Marketing

University of San Francisco B.S. in Entrepreneurship & Innovation, 2022

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC

Financial Advisor, 1/2023 – present

**Item 3: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Simon.

**Item 4: Other Business Activities**

Mr. Simon does not participate in outside business activities.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Simon does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

**Item 6: Supervision**

Mr. Simon reports to the principals of the firm, and also the firm's Chief Compliance Officer, Joseph Skees. All employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Mr. Skees may be reached via telephone at 888-610-8881.

Item 1: Cover Sheet

FORM ADV PART 2B

## Peter Crawford Waitkun



GRANITE BAY WEALTH MANAGEMENT, LLC

Main Office:

22 Deer Street, Suite 200

Portsmouth, NH 03801

888.610.8881

603.610.8881

March 25, 2026

This Brochure Supplement provides information about Peter Crawford Waitkun that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.

Additional information about Peter Crawford Waitkun is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2: Educational Background and Business Experience**

**Peter Crawford Waitkun**

**Born: 1983**

**EDUCATION:**

University of New Hampshire, B.S. in Business Administration & Finance, 2005

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC  
Trader/Portfolio Manager, 1/2024 – present

All Star Charts Research  
Director of Investor Success, 8/2020 – 1/2024

Congruity / Procurri  
Account Manager, 2/2018 – 8/2020

John Hancock Investments  
Internal Business Consultant, 10/2016 – 2/2018

Fidelity Investments  
Premium Relationship Associate & Investment Sales Associate, 12/2015 – 10/2016

**PROFESSIONAL DESIGNATIONS**

Chartered Market Technician® (CMT)

The Chartered Market Technician® (CMT) Program is designed to provide finance professionals with a comprehensive understanding of technical analysis, market dynamics, and applied investment strategies. The curriculum spans three levels, advancing from foundational principles to sophisticated analytical techniques, ensuring that candidates build practical skills in risk management, trend analysis, and behavioral finance.

A candidate must:

**1) Pass all three levels of the CMT Exams**

The CMT Program consists of three comprehensive exams. To earn the Chartered Market Technician® designation, candidates must pass all three levels, which build technical analysis proficiency, from basic concepts to advanced trading strategies.

## **2) Accumulate qualifying professional work experience**

Candidates need relevant work experience that contributes directly to financial market analysis or investment decision-making. Experience can be accumulated before, during, or after participating in the CMT Program.

## **3) Apply for Professional Membership status**

Candidates must join CMT Association as Professional Members, including submitting professional references to verify work and character, to earn their charter.

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Waitkun.

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

Mr. Waitkun does not participate in outside business activities.

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

Other than salary, annual bonuses, or regular bonuses, Mr. Waitkun does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

### **Item 6: Supervision**

Mr. Waitkun reports to the principals of the firm, and also the firm's Chief Compliance Officer, Joseph Skees. All employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Mr. Skees may be reached via telephone at 888-610-8881.

Item 1: Cover Sheet

FORM ADV PART 2B

**John W. Slattery**



GRANITE BAY WEALTH MANAGEMENT, LLC  
22 Deer Street, Suite 200  
Portsmouth, NH 03801

888.610.8881  
603.610.8881

**April 3, 2026**

**This Brochure Supplement provides information about John W. Slattery that supplements the Granite Bay Wealth Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Joseph Skees at the number above if you did not receive Granite Bay Wealth Management, LLC Brochure or if you have any questions about the contents of this supplement. Registration does not imply any certain level of skill or training.**

**Additional information about John W. Slattery is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Educational Background and Business Experience**

**John W. Slattery**

**Born: 1985**

**EDUCATION:**

St. Lawrence University, 9/2004 – 5/2008, B.A. in Economics

**BUSINESS EXPERIENCE:**

Granite Bay Wealth Management, LLC  
Financial Advisor, 3/2026 – present

KeyBank Investment Services, LLC  
Associate Relationship Manager, 5/2022 – 3/2026

Camden National Bank  
Relationship Banker, 11/2020 – 5/2022

**Item 3: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for Mr. Slattery.

**Item 4: Other Business Activities**

Mr. Slattery maintains multiple residential rental properties. This activity does not interfere with Mr. Slattery's advisory services nor are there any conflicts of interest with his activities at Granite Bay Wealth Management.

**Item 5: Additional Compensation**

Other than salary, annual bonuses, or regular bonuses, Mr. Slattery does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through GBWM.

**Item 6: Supervision**

Mr. Slattery reports to the principals of the firm, and also the firm's Chief Compliance Officer, Joseph Skees. All employees of GBWM are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with securities laws in the states where GBWM is registered. Mr. Skees may be reached via telephone at 888-610-8881.

## Introduction

Granite Bay Wealth Management, LLC (“GBWM”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## What investment services and advice can you provide me?

GBWM provides personalized investment management and financial planning services to retail clients. Clients advised include individuals, trusts, charitable organizations, corporations and ERISA plans and their sponsors. GBWM requires each client to place at least \$500,000 with the firm. This minimum may be waived in the discretion of GBWM.

### Financial Planning

GBWM may provide its clients with broad or focused financial planning and consulting services on topics including but not limited to Investments, Insurance, Education Funding, Budgeting, Estate Planning, Tax Minimization, and Retirement.

### Investment Management

When we perform investment management services, we will do so on a discretionary basis. This means we will not seek specific approval of changes to the securities in client accounts. Each client’s portfolio will be invested according to that client’s investment objectives. GBWM determines these objectives with the client through reviewing client provided documents, client interviews and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will develop a portfolio we believe will best fit your needs. GBWM allocates client assets among multiple Exchange Traded Funds and Options Contracts, however GBWM may in certain circumstances utilize Mutual Funds, Equities, Bonds and other securities necessary to meet client’s investment objectives. Options contracts consist of a right to purchase or sell a security at a given price on a future date. Options contracts include enhanced risk that a contract may expire with minimal or no value and the possibility of enhanced gain or loss due to their leveraged nature. GBWM may also direct client’s assets be allocated in variable annuity products, employer-sponsored plans, and/or 529 plans.

We will monitor your account at least quarterly. Account monitoring is offered as part of our standard investment advisory services. Our investment advice will cover a limited selection of investments. Although we offer advice on a broad range of investment selections, we are limited to investments available through our custodians.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients available by [clicking here](#).

? “Given my financial situation, should I choose an investment advisory service? Why or why not?”

? “How will you choose investments to recommend to me?”

? “What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”

## What fees will I pay?

Fees are negotiable, and may be higher or lower, based on the nature of the account, and the origin of the client, as many clients that have worked with GBWM’s professionals in the past and may continue with the fee percentages imposed by the principal’s prior firms.

### Financial Planning

Clients who are engaging GBWM for financial planning services without asset management services will do so on an hourly basis. Hourly rates range from \$200 – \$300, depending upon the professional rendering the service. An estimate of total hours to complete the assignment will be determined at the start of the engagement.

### Asset Management

GBWM’s asset management fees are based on a percentage of the gross market value of a client’s assets managed by GBWM, and the fee range generally varies from 0.50% to 1.50% on an annual basis. Fees are calculated and

charged on a quarterly basis in advance. Other factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or commissions for the purchase or sale of a stock. GBWM does not impose a minimum annual fee. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For more specific information regarding our fees, please refer to our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available by [clicking here](#).

**?o** ***“Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”***

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Certain professionals of GBWM are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for GBWM clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of GBWM. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client’s needs. Certain professionals of GBWM are registered representatives of Purshe Kaplan Sterling Investments, Inc. (“PKS”), a FINRA member broker-dealer. Because PKS supervises the activities of these professionals as registered representatives, clients receiving brokerage services from PKS will also receive a separate PKS Form CRS. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those they recommend to clients. Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative.

For more specific information regarding our fees, please refer to our Disclosure Brochure, the ADV Part 2A under Item 5 Fees and Compensation available by [clicking here](#).

**?o** ***“How might your conflicts of interest affect me, and how will you address them?”***

**How do your financial professionals make money?**

Financial professionals of GBWM are paid a portion of the asset management fees collected from clients. Financial professionals are not rewarded sales bonuses.

**Do you or your financial professionals have legal or disciplinary history?**

Yes. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS).

**?o** ***“As a financial professional, do you have any disciplinary history? For what type of conduct?”***

**Additional Information**

Additional information about our investment advisory services can be found at [www.granitebaywm.com](http://www.granitebaywm.com). A copy of our *relationship summary* can also be requested by calling (603)610-8881 or by [clicking here](#).

**?o** ***“Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?”***

**?o** ***“Who can I talk to if I have concerns about how this person is treating me?”***

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PRIVACY NOTICE

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Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

**TYPES OF NONPUBLIC PERSONAL INFORMATION (“NPI”) WE COLLECT**

We collect NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

**PARTIES TO WHOM WE DISCLOSE INFORMATION**

All Investment Advisers may need to share NPI to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, work with technology providers, compliance consultants, and counsel, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates’ everyday business purposes – information about your transactions and experiences; or

If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. However, please note we do not use NPI to give to third parties so they may market to you.

**PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT’S INFORMATION**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

**THE RIGHT TO LIMIT SHARING – OPTING OUT AND OPTING IN**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: (i) sharing for affiliates’ everyday business purposes -- information about your creditworthiness; and (ii) sharing with affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

Massachusetts law gives its residents additional rights to limit sharing. Under Massachusetts law, we may not share NPI with non-affiliates unless we first receive written permission (opting-in”). If we do not receive permission to share this NPI, then we are prohibited from sharing this NPI with “non- affiliates” as defined below.

**I give you permission to share my NPI with non-affiliates as described herein.**

*Signature of Client(s):* \_\_\_\_\_

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non- affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

*Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.*

**PRIVACY NOTICE SUPPLEMENT: CALIFORNIA RESIDENTS**

California law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the California Attorney General at P.O. Box 944255, Sacramento, CA 94244; phone (916) 210-6276.

**PRIVACY NOTICE SUPPLEMENT: COLORADO RESIDENTS**

Colorado law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, Colorado Department of Law at 1300 Broadway, 10<sup>th</sup> Floor, Denver, CO 80203; phone (720) 508-6000.

**PRIVACY NOTICE SUPPLEMENT: CONNECTICUT RESIDENTS**

Connecticut law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106; phone (860) 808-5318; email [Attorney.General@ct.gov](mailto:Attorney.General@ct.gov).

**PRIVACY NOTICE SUPPLEMENT: FLORIDA RESIDENTS**

Florida law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, PL-01 The Capitol, Tallahassee, FL 32399-1050; phone (866) 966-7226.

**PRIVACY NOTICE SUPPLEMENT: MONTANA RESIDENTS**

Montana law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 215 N Sanders, Third Floor, PO Box 201401, Helena, MT 59620-1401; phone (406) 444-2026; [contactdoj@mt.gov](mailto:contactdoj@mt.gov)

**PRIVACY NOTICE SUPPLEMENT: NORTH CAROLINA RESIDENTS**

North Carolina law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27699-9001; phone (919) 716-6400.

**PRIVACY NOTICE SUPPLEMENT: NEW HAMPSHIRE RESIDENTS**

New Hampshire law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 1 Granite Place South Concord, NH 03301; phone (603) 271-3658.

**PRIVACY NOTICE SUPPLEMENT: NEW JERSEY RESIDENTS**

New Jersey law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 140 East Front Street, 6th Floor Trenton, NJ 08625-0090; phone (609) 292-4925.

**PRIVACY NOTICE SUPPLEMENT: RHODE ISLAND RESIDENTS**

Rhode Island law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, Licht Judicial Complex, 150 South Main Street, Providence, RI 02903; phone (401) 274-4400; email [ag@riag.ri.gov](mailto:ag@riag.ri.gov).

**PRIVACY NOTICE SUPPLEMENT: TENNESSEE RESIDENTS**

Tennessee law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, P.O. Box 20207, Nashville, TN 37202; phone (615) 741-3491.

**PRIVACY NOTICE SUPPLEMENT: TEXAS RESIDENTS**

Texas law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, P.O. Box 12548, Austin, TX 78711-2548; phone (512) 463-2100.

**PRIVACY NOTICE SUPPLEMENT: VIRGINIA RESIDENTS**

Virginia law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at 888.610.8881. To obtain further information, contact The Office of the Attorney General, 202 North Ninth Street, Richmond, VA 23219; phone (804) 786-2071.