Bogart Wealth, LLC

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Form ADV Part 2A, Brochure

This Brochure provides information about the qualifications and business practices of Bogart Wealth, LLC. If you have any questions about the contents of this Brochure, please contact us at (703) 570-8651. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Bogart Wealth, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

References herein to Bogart Wealth, LLC as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 1 Cover Page

Item 2 Material Changes

In this Item, Bogart Wealth, LLC (hereinafter "Bogart Wealth" or the "Firm") is required to describe any material changes that have been made to this Brochure since the most recent annual updating amendment on March 24, 2026. Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of material changes. Since March 24, 2026, the following material changes have occurred:

- August 2026: Bogart Wealth has added Fidelity as a Custodian, as referenced throughout this Brochure; Item 4 has been updated to discuss certain Estate Planning tools, education, and Trust Services made available. Item 14 has been updated to reflect a referral arrangement.

Our firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at www.adviserinfo.sec.gov or may contact our firm at (703)570-8651 to request a copy at any time.

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Item 4 Advisory Business

A. Bogart Wealth is a limited liability company organized under the laws of the state of Delaware. The Firm became registered with the SEC as an investment adviser in June 2016. Principal owners of the Firm include James Bogart and Constellation Wealth Capital (CWC). James Bogart maintains a majority ownership stake and control.

B. Bogart Wealth offers a variety of advisory services, which include financial planning, consulting, and wealth management services. Before Bogart Wealth renders any of the foregoing advisory services, clients are required to enter into a written agreement with Bogart Wealth setting forth the relevant terms and conditions of the relationship.

While this Brochure generally describes the business of Bogart Wealth, certain sections also discuss the activities of its "Supervised Persons," which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees or any other person who provides investment advice on Bogart Wealth's behalf and is subject to the Firm's supervision or control.

FINANCIAL PLANNING AND CONSULTING SERVICES

Bogart Wealth offers clients a range of financial planning and consulting services, which include any or all the following functions, depending on the client's engagement:

- Business Planning
- Tax and Cash Flow Planning
- Trust and Estate Planning
- Retirement Planning
- Education Planning

Bogart Wealth provides these services in conjunction with investment portfolio management as part of a comprehensive "wealth management" engagement, which is described in more detail below. In performing these services, Bogart Wealth is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.,) and is expressly authorized to rely on such information. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Bogart Wealth under a financial planning or consulting engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Bogart Wealth's recommendations and/or services.

Bogart Wealth, LLC, provides tax preparation and return services for clients of Bogart Wealth through a relationship with an unaffiliated accounting firm. These services are available to all clients, but Bogart Wealth will pay the expenses associated with these services for clients who maintain $2 million in managed assets with it. Bogart Wealth reserves the right to pay the expenses associated with this service for clients who maintain less than $2 million in managed assets. These services are generally only available for personal tax returns for clients. Bogart Wealth may agree to share the expenses or assume the expenses associated with tax returns for spouses filing separately, children of clients, or businesses in certain instances, but is not obligated to do so. Clients with less than $2 million in managed assets with Bogart Wealth will be provided with information about the

rates for tax return and preparation services from our preferred accountants. Clients are under no obligation to accept our available accounting services, but Bogart Wealth will not provide clients with a credit or any sort of assistance to obtain tax preparation or return services through other providers.

WEALTH MANAGEMENT SERVICES

Bogart Wealth provides clients with wealth management services, which include a broad range of comprehensive financial planning and consulting services as well as discretionary and non-discretionary management of investment portfolios. The Firm specializes in advising clients on the rolling over of retirement account assets and then managing those assets. Bogart Wealth provides these services in conjunction with investment portfolio management as part of a comprehensive wealth management engagement.

Bogart Wealth generally manages fully discretionary client accounts invested in a Bogart Wealth model strategy. Where appropriate, the Firm also provides its managed account clients with advice about legacy positions or other investments held in client portfolios, generally on a non-discretionary basis. Clients also, from time to time, engage Bogart Wealth to manage and/or advise on certain investment products that are not maintained at their primary custodian, assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Bogart Wealth directs or recommends the allocation of client assets among the various investment options available with the product.

Before Bogart Wealth can provide wealth management services, clients must open a securities brokerage account and complete a new account agreement with Charles Schwab and Co., Inc. and/or its affiliates ("Schwab"), Fidelity Investments ("Fidelity"), or another broker-dealer that Bogart Wealth approves.

Next, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, Bogart Wealth assists its clients in selecting an appropriate strategy for managing their assets. Please refer to Item 8 below for descriptions of the specific model portfolios Bogart Wealth manages in this respect. Bogart Wealth assumes that there are no restrictions on its services, other than to manage the account in accordance with the client's designated investment objective, unless the client indicates to the contrary in its investor profile.

Once Bogart Wealth allocates the client's assets to one or more model portfolios described in Item 8 below, the investment portfolios are managed primarily on a discretionary basis. However, as described above, Bogart Wealth also accepts non-discretionary engagements for which client provides approval for all Bogart Wealth recommendations.

A portfolio manager reviews each of the models on a periodic basis and may also make changes periodically (as often as daily) based on real-time market developments. The model portfolios are subject to ongoing supervision by the Firm's Investment Portfolio Committee, which may change a model portfolio's asset allocation or securities within a model portfolio, which will then generally be implemented in client's portfolios. Because Bogart Wealth manages client accounts according to its models, account rebalancing and transactions usually transpire without regard to a client's individual tax ramifications. In addition to a review of the models themselves, Bogart Wealth also reviews individual accounts for account drift, withdrawals and deposits, and upon client request. Bogart

Wealth may rebalance the accounts based on those reviews. However, based upon these and other factors, there may be extended periods of time when Bogart Wealth determines not to execute trades in a client's account. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity. Clients should contact the Firm if they experience a change in their financial situation or if they want to impose reasonable restrictions on the management of their accounts.

Trust Services. Bogart Wealth makes trust services available to eligible clients through an agreement with an unaffiliated firm which provides corporate trustee services. These services are generally designed for Bogart Wealth clients who maintain over $5 million in managed assets and have expressed a need for such services. Clients with less than $5M in managed assets will be evaluated on a case-by-case basis. Bogart Wealth's advisory fees are not inclusive of trust service for clients. Trust services are a separate service and a separate cost that clients will pay to the unaffiliated corporate trustee firm directly for services received. Bogart Wealth's role is limited to financial planning, education and introduction to our preferred vendor. Bogart Wealth does not receive a fee or compensation for introducing clients to the unaffiliated trust service firm. Clients accessing trust services through Bogart Wealth's relationship are eligible to receive such services at a reduced rate relative to the fee that would have been charged through direct individual engagement with the select trust service firm. Clients are under no obligation to use trust services available through Bogart Wealth.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. To the extent requested by a client, Bogart Wealth will generally provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, etc. Bogart Wealth will generally provide such consulting services inclusive of its advisory fee set forth at Item 5 below. Bogart Wealth does not serve as an attorney or accountant, and no portion of our services should be construed as legal or accounting services. Accordingly, Bogart Wealth does not prepare estate planning documents or tax returns. To the extent requested by a client, we may recommend or directly engage the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, etc.). The client is under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Bogart Wealth and/or its representatives. If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Retirement Rollovers-Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Bogart Wealth recommends that a client roll over their retirement plan assets into an account to be managed by Bogart Wealth, such a

recommendation creates a conflict of interest if Bogart Wealth will earn new (or increase its current) compensation as a result of the rollover. If Bogart Wealth provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer's plan or an existing IRA), Bogart Wealth is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by Bogart Wealth, whether it is from an employer's plan or an existing IRA.

Estate Planning Services (Vanilla). Bogart Wealth makes available to certain clients the opportunity to consider and/or create various types of basic estate planning documents (i.e., wills, trusts, etc.) in conjunction with the estate planning software platform provided by *Vanilla*. All such documents are created by the client utilizing *Vanilla's* estate planning platform. Bogart Wealth does not charge an additional fee to its clients to utilize *Vanilla*. For clients whose situation and needs require more sophisticated and customized estate planning advice and/or documents, the engagement of legal counsel should be considered. No client is under any obligation to utilize *Vanilla*.

Bogart Wealth is not a law firm, and no portion of its services, including those provided in conjunction with *Vanilla*, should be considered as legal advice, or the substitute for the client's engagement of legal counsel. Accordingly, Bogart Wealth does not prepare legal documents.

Bogart Wealth has employed an Estate Planning Strategist whose role is to provide estate planning education and identify potential estate planning issues to Bogart Wealth clients, and to assist the client in coordination with the client's choses estate planning attorney. The Estate Planning Strategist is a licensed attorney; however, he does not serve in a legal capacity to Bogart Wealth or its clients. Neither Bogart Wealth nor any person associated with Bogart provides legal services, including the preparation of estate planning documents.

Direct Indexing. Direct indexing involves constructing a portfolio by purchasing individual securities intended to replicate an intended index or benchmark (e.g., S&P, Dow Jones, Russell 2000). Direct indexing allows for customization of an individual client's portfolio based upon the client's personal preferences and investment objectives. Additional benefits also include the potential to implement more effective tax-loss harvesting strategies. For those clients who implement direct indexing as a part of their investment portfolio, their investment adviser will work with them to determine what portion of their portfolio should be allocated to track an index or a blend of indices. Bogart Wealth would then invest that portion of the client's portfolio into individual equities, ETFs and mutual funds with the goal of tracking the desired index or benchmark.

Socially Responsible (ESG) Investing Limitations. Socially Responsible Investing involves the incorporation of Environmental, Social and Governance ("ESG") considerations into the investment due diligence process. ESG investing incorporates a set of criteria/factors used in evaluating potential investments: Environmental (i.e., considers how a company safeguards the environment); Social (i.e., the manner in which a company manages relationships with its employees, customers, and the communities in which it operates); and Governance (i.e., company management considerations). The number of companies that meet an acceptable ESG mandate can be limited when compared to those

that do not and could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. Correspondingly, the number of ESG mutual funds and exchange-traded funds is limited when compared to those that do not maintain such a mandate. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by Bogart Wealth), there can be no assurance that investment in ESG securities or funds will be profitable or prove successful. Bogart Wealth does not maintain or advocate an ESG investment strategy but will seek to employ ESG if directed by a client to do so. If implemented, Bogart Wealth shall rely upon the assessments undertaken by the unaffiliated mutual fund, exchange traded fund or separate account portfolio manager to determine that the fund's or portfolio's underlying company securities meet a socially responsible mandate.

Cryptocurrency. Should an opportunity arise, Bogart might decide to utilize a Cryptocurrency related ETF as an investment in certain Bogart Wealth portfolio strategies, as deemed suitable to the client's risk tolerance and strategy. 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 using 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, including any Cryptocurrency related ETF, is currently considered to be a speculative investment. At any time, a client can request a restriction on the use of Cryptocurrency ETFs, or any specific security or asset class, in their Bogart Wealth managed account.

Structured Notes. Bogart Wealth may purchase structured notes for client accounts. A structured note is a financial instrument that combines two elements, debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counterparty risk of the issuer. However, the return on the note is linked to the return of an underlying asset or assets (such as the S&P 500 Index or commodities). It is this latter feature that makes structured products unique, as the payout can be used to provide some degree of principal protection, leveraged returns (but usually with some cap on the maximum return), and be tailored to a specific market or economic view. In addition, investors may receive long-term capital gains tax treatment if certain underlying conditions are met, and the note is held for more than one year**.** Finally, structured notes may also have liquidity constraints, such that the sale thereof before maturity may be limited.

Interval Funds/Risks and Limitations. Where appropriate, Bogart Wealth may utilize interval funds (and other types of securities that could pose additional risks, including lack of liquidity and restrictions on withdrawals). An interval fund is a non-traditional type of closed-end mutual fund that periodically offers to buy back a percentage of outstanding shares from shareholders. Investments in an interval fund involve additional risk, including lack of liquidity and restrictions on withdrawals. During any time periods outside of the specified repurchase offer window(s), investors will be unable to sell their shares of the interval fund.

There is no assurance that an investor will be able to tender shares when or in the amount desired. There can also be situations where an interval fund has a limited amount of capacity to repurchase shares and may not be able to fulfill all purchase orders. In addition, the eventual sale price for the interval fund could be less than the interval fund value on the date that the sale was requested.

While an interval fund periodically offers to repurchase a portion of its securities, there is no guarantee that investors may sell their shares at any given time or in the desired amount. As interval funds can expose investors to liquidity risk, investors should consider interval fund shares to be an illiquid investment. Typically, the interval funds are not listed on any securities exchange and are not publicly traded. Therefore, there is no secondary market for the fund's shares.

Because these types of investments involve certain additional risk, these funds will only be utilized when consistent with a client's investment objectives, individual situation, suitability, tolerance for risk and liquidity needs. Investment should be avoided where an investor has a short-term investing horizon and/or cannot bear the loss of some, or all, of the investment. There can be no assurance that an interval fund investment will prove profitable or successful. Considering these enhanced risks, a client may direct Bogart Wealth, in writing, not to purchase interval funds for the client's account.

Account Aggregation Tools. In conjunction with the services provided by third party service providers, Bogart Wealth may also provide periodic comprehensive reporting services, which can incorporate all the client's investment assets including those investment assets that are not part of the assets managed by Bogart Wealth (the "Excluded Assets"). Bogart Wealth's service relative to the Excluded Assets is limited to reporting services only, which does not include investment implementation.

Because Bogart Wealth does not have trading authority for the Excluded Assets, to the extent applicable to the nature of the Excluded Assets (assets over which the client maintains trading authority vs. trading authority designated to another investment professional), the client (and/or the other investment professional), and not Bogart Wealth, shall be exclusively responsible for directly implementing any recommendations relative to the Excluded Assets.

Without limiting the above, Bogart Wealth shall not be responsible for any implementation error (timing, trading, etc.) related to the Excluded Assets. In the event the client desires that Bogart Wealth provide investment management services (whereby Bogart Wealth would have trading authority) with respect to the Excluded Assets, the client may engage Bogart Wealth to do so pursuant to the terms and conditions of the advisory agreement between Bogart Wealth and the client.

Availability of Mutual Funds and Exchange Traded Funds. While Bogart Wealth may allocate investment assets to mutual funds and exchange traded funds ("ETFs") that are not available directly to the public, it may also allocate investment assets to publicly available mutual funds and ETFs that the client could purchase without engaging Bogart Wealth as an investment adviser. However, if a client or prospective client determines to purchase publicly available mutual funds or ETFs without engaging Bogart Wealth as an investment adviser, the client or prospective client would not receive the benefit of Bogart Wealth's initial and ongoing investment advisory services with respect to management of the asset.

Cash Positions. Bogart Wealth treats cash as an asset class. As such, all cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating Bogart Wealth's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Bogart Wealth may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such

amounts could miss market advances. Depending upon current yields, at any point in time, Bogart Wealth's advisory fee could exceed the interest paid by the client's money market fund.

Cash Sweep Accounts. Certain account custodians can require that cash proceeds from account transactions or new deposits be swept to and/or initially maintained in a specific custodian designated sweep account. The yield on the sweep account will generally be lower than those available for other money market accounts. When this occurs, to help mitigate the corresponding yield dispersion Bogart Wealth shall (usually within 30 days thereafter) generally (with exceptions) purchase a higher yielding money market fund (or other type security) available on the custodian's platform, unless Bogart Wealth reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to the amount of dispersion between the sweep account and a money market fund, the size of the cash balance, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account.

The above does not apply to the cash component maintained within a Bogart Wealth actively managed investment strategy (the cash balances for which shall generally remain in the custodian designated cash sweep account), an indication from the client of a need for access to such cash, assets allocated to an unaffiliated investment manager and cash balances maintained for fee billing purposes.

The client shall remain exclusively responsible for yield dispersion/cash balance decisions and corresponding transactions for cash balances maintained in any Bogart Wealth unmanaged accounts.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Bogart Wealth) will be profitable or equal any specific performance level(s).

Client Obligations. In performing our services, Bogart Wealth shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, it remains each client's responsibility to promptly notify Bogart Wealth if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising our previous recommendations and/or services.

Artificial Intelligence. Bogart Wealth may use certain Artificial Intelligence ("AI") tools in connection with its investment advisory services. Bogart Wealth has adopted an AI Policy that governs the appropriate use of AI tools to ensure that Bogart Wealth and its employees abide by their fiduciary duty and comply with all applicable regulations. AI tools are not used by Bogart Wealth as a substitute for professional judgment by Bogart Wealth or its employees, and all AI generated output is reviewed by Bogart Wealth for accuracy. All investment decisions and recommendations are made and approved by Bogart Wealth. The use of AI tools does not guarantee the accuracy of analyses or the success of any investment strategy. Clients should not assume that reliance on AI tools results in better performance or reduces risk. AI tools involve limitations and risks that

Bogart Wealth monitors and manages. These risks include, but are not limited to, data security concerns, potential inaccuracies, and possible algorithmic biases. To mitigate these risks, Bogart Wealth has implemented controls such as pre-approval requirements for AI tools, restrictions on providing nonpublic personal information to public AI systems, vendor due diligence, review of AI-generated materials, and employee training on appropriate AI usage.

Cybersecurity Risk. The information technology systems and networks that Bogart Wealth and its third-party service providers use to provide services to Bogart Wealth's clients employ various controls that are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in Bogart Wealth's operations and/or result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and Bogart Wealth are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur financial losses and/or other adverse consequences. Although Bogart Wealth has established processes to reduce the risk of cybersecurity incidents, there is no guarantee that these efforts will always be successful, especially considering that Bogart Wealth does not control the cybersecurity measures and policies employed by third-party service providers, issuers of securities, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchanges and other financial market operators and providers.

Client Privacy and Confidentiality. Bogart Wealth maintains policies and procedures designed to help protect the confidentiality and security of client nonpublic personal information ("NPPI"). NPPI includes, but is not limited to, social security numbers, credit or debit card numbers, state identification card numbers, driver's license number and account numbers. Bogart Wealth maintains administrative, technical, and physical safeguards designed to protect such information from unauthorized access, use, loss, or destruction. These safeguards include controls relating to data access, information security, and incident response, and are reviewed to address changes in risk and business. Client information may be disclosed in response to regulatory requests, legal obligations, or as otherwise permitted by law, and any such disclosure is made in accordance with applicable privacy and confidentiality requirements.

Bogart Wealth may engage non-affiliated service providers in connection with providing advisory services, and such providers may have access to client NPPI, as necessary, to perform their functions. Bogart Wealth confirms that service providers maintain safeguards designed to protect client information from unauthorized access or use and provide notice to Bogart Wealth in the event of a cybersecurity incident involving client information maintained by the service provider. While Bogart Wealth maintains policies and procedures designed to protect client information, such measures cannot eliminate all risk. Bogart Wealth will notify clients in the event of a data breach involving their NPPI as may be required by applicable state and federal laws.

Disclosure Statement. A copy of Bogart Wealth's written Brochure and Client Relationship Summary, as set forth on Part 2A of Form ADV and Form CRS respectively, shall be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement.

C. Bogart Wealth renders its investment advice primarily through the management of its model portfolios. As described above, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk

tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, Bogart Wealth assists its clients in selecting an appropriate strategy for managing their assets. Bogart Wealth then manages the client's account according to the selected strategy. Clients are advised to promptly notify Bogart Wealth if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios.

Clients may impose reasonable restrictions or mandates on the management of their accounts if Bogart Wealth determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

D. Bogart Wealth does not offer investment advisory services on a wrap fee basis.

E. As of December 31, 2025, Bogart Wealth had $ 3,190,530,230 in assets under management, $2,510,632,050 of which was managed on a discretionary basis and $679,898,180 of which was managed on a non-discretionary basis.

Item 5 Fees and Compensation

A. Wealth Management clients pay a single, flat annualized investment advisory fee based upon assets under management. The investment advisory fee generally varies between 55 and 143 basis points (0.55%–1.43%), depending upon the size of a client's portfolio, which is generally based upon the following annual fee schedule:

PORTFOLIO VALUE	BASE FEE
Up to $100,000	1.43%
$100,001 - $250,000	1.32%
$250,001 - $500,000	1.21%
$500,001 - $2,000,000	1.10%
$2,000,001 - $5,000,000	0.99%
$5,000,001 - $10,000,000	0.825%
Above $10,000,000	0.55%

The annual investment advisory fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Bogart Wealth on the last day of the previous billing period. The above fee schedule generally applies to all assets managed by Bogart Wealth and not by reference to each account being managed for the client. Bogart Wealth will generally maintain some cash and cash equivalent positions (such as money market funds) for defensive and liquidity purposes. Unless otherwise agreed in writing, all cash and cash equivalent positions will be included as part of assets under management for purposes of calculating Bogart Wealth's investment advisory fee. Bogart Wealth reserves the right, in its sole discretion, to negotiate and charge different fees for certain accounts based on the client's particular needs, overall relationship with Bogart and other factors unique to the client's particular circumstances.

B. Clients generally provide Bogart Wealth with the authority to directly debit their accounts for payment of the investment advisory fee. The Financial Institutions that act as qualified custodians for client accounts, from which Bogart Wealth retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Bogart Wealth.

C. To the extent that a client's assets are invested in a pooled investment vehicle such as a mutual fund or an exchange-traded fund, the client will indirectly bear fees and expenses charged by the underlying pooled investment. These fees and expenses are described in each fund's prospectus or other offering documents and potentially include a management fee, distribution fee (i.e., rule 12b-1 fee), and other fund expenses.

D. Where Bogart Wealth allocates a portion of a client's investment assets to one or more unaffiliated independent investment managers to implement a direct indexing or alternative strategy, the investment management fee charged by the Independent Manager(s) is separate from, and in addition to, Bogart Wealth's investment advisory fee.

E. As discussed at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, Bogart Wealth generally recommends that the client select from *Fidelity or Schwab* serve as the broker-dealer/custodian for client investment management assets, as these are the custodial platforms where Bogart is set up to service. Broker-dealers such as *Fidelity and Schwab* charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian. While certain custodians, generally (with exceptions) do not currently charge fees on individual equity transactions (including ETFs), others do.

There can be no assurance that *a custodian* will not change its transaction fee pricing in the future.

Schwab and Fidelity may also assess fees to clients who elect to receive trade confirmations and account statements by regular mail rather than electronically.

F. The annual investment advisory fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Bogart Wealth on the last day of the previous billing period. Clients may make additions to and withdrawals from their account at any time, subject to Bogart Wealth's right to terminate an account. Billing adjustments are made on a prorated basis for inflows and outflows in excess of $50,000 during the billing period.

Additionally, regarding deposits during a quarter, Bogart Wealth considers whether the additional funds cause a client to reach a breakpoint at the household level and adjusts the client's subsequent fee rate accordingly. Any fee rate change will be made at the time of quarterly fee calculation for next period's billing calculation. If a client receives a more favorable rate over time due to householding adjustments made in conjunction with quarterly household assessment, Bogart Wealth reserves the right to make adjustments back to an appropriate tier within the standard fee schedule, determined by household asset level, client agreement, and in accordance with the above standard annual fee schedule.

Additions may be in cash or securities provided that Bogart Wealth reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to Bogart Wealth, subject to the usual and customary securities settlement procedures. However, Bogart Wealth designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a client's investment objectives.

Bogart Wealth consults with its clients about the options and implications of transferring securities as necessary. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge) and/or tax ramifications. Upon termination of the wealth management agreement, Bogart Wealth will refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

G. Neither Bogart Wealth nor its representatives accept compensation from the sale of securities or other investment product.

Item 6 Performance-Based Fees and Side-by-Side Management

Bogart Wealth does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client's assets).

Item 7 Types of Clients

Bogart provides its services to individuals, trusts, estates, and charitable organizations. Bogart does not generally impose any minimum account size requirements. However, certain models have minimum and maximum account values as described in Item 8.B. Direct Indexing SMA strategy generally requires a higher account minimum of $250k.

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

A. Methods of Analysis and Investment Strategies

Overview

Bogart Wealth uses a combination of fundamental and technical methods of analysis and manages client accounts through model portfolios. The investment objectives of each model portfolio, their asset allocation and their universe of securities are described in greater detail below in Item 8.

Client allocation amongst the model portfolios is generally determined through discussion between client and adviser, based on assessment of the client's risk profile, overall investment objectives and financial plan, and as generally outlined in an investment proposal prepared for client review prior to investment of the allocations.

Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal to any specific performance level.

B. Our Approach to Investing

Getting to Know our Client

Before we advise any client, we get to know them. We strive to understand what they're trying to achieve in life, what they might want to pass on to their families, what they desire to do in retirement and other goals.

We also communicate with our clients regularly — and often proactively. Our advisors like to ensure that client investments are not only well suitable — but that client goals and dreams are being served by their portfolios. As markets shift and volatility arises, we may contact affected clients to discuss options, but we also need to know when personal objectives shift, too. Many life changes produce risks and opportunities that we can help clients address.

Getting to Know our Investments

With goals established, we turn to a wide universe of instruments. Every investment involves risk. We use a variety of approaches to manage that risk.

Our Approach — We believe that diversification helps to reduce risk. We use internal analytical screens to further inform the investment decision and security selection process. We consider various security categories, including cash and bonds, and invest across the market capitalization spectrum, both domestic and abroad.

When evaluating potential equity portfolio holdings across our stock-only model strategies, we follow a bottom-up investment approach that focuses predominantly on company and industry level fundamental analysis. We also apply technical analysis with a focus on factors such as relative strength and momentum.

For our Asset Allocation Strategies, we apply a top-down economic analysis, meaning we start with studies of broad economic cycles, and work down to the ground level to specific industry and company analysis.

Formal Governance — We make our investment decisions through a formal Investment Portfolio Committee prior to implementing changes to our model portfolios. The committee is responsible for determining asset allocation, security selection and rebalancing parameters.

Invest Long-Term — We believe in long-term investing and do not suggest trying to time the markets. Although we periodically reduce exposure to hot sectors and rotate funds to out of favor sectors, we try not to let emotional decisions replace rational judgment. We believe sticking to the plan can provide superior returns.

Equities — We believe in value-added equity research with the overall purpose of managing risk while maximizing returns.

Monitor Progress — We monitor our model portfolio's performance periodically and compare progress to their peer groups and respective benchmarks.

Model Strategies

Bogart Wealth currently offers the following model strategies for wealth management services:

Global Asset Allocation Models:

- Conservative Growth
- Select Conservative
- Balanced
- Select Balanced
- Growth
- Select Growth
- Aggressive Growth
- Select Aggressive Growth
- Income
- Select Income

Equity Stock Models:

- All Cap Growth
- Dividend and Growth
- Prime Income

Additional Strategies:

- Direct Indexing SMA
- Structured Note
- Bond Ladder
- Alternatives:
  - Private Equity
  - Private Credit
  - Real Estate
  - Diversified Alternatives

Bogart Wealth manages several global asset allocation models (the "Global Asset Allocation Models"), which use primarily passive (indexed) and select active mutual funds and ETFs. However, Bogart Wealth offers to manage each Global Asset Allocation Model as an ETF-only strategy ("Select").

Select models are generally available to accounts valued between $0 and $99,999.99. All other models are generally available for accounts with $100,000 or more. Bogart Wealth may waive an account minimum or maximum in its sole discretion.

The reference to "Select" means that Bogart Wealth manages these accounts differently than the non-Select version of the same strategy. For example, the Select Balanced, Select Income, Select Conservative, Select Growth, and Select Aggressive Growth strategies currently use only ETFs, which do not charge transaction fees for their purchase and sale in managing the model. Other suitable investment alternatives may exist that are less expensive or better performing for Select model strategies. In the future, Bogart Wealth's account portfolio managers in their discretion, and with the Investment Portfolio

Committee's oversight, may expand the universe of available securities used in the Select model strategies.

Select models have the same investment objectives as the identified model but generally trade less frequently. These models will be rebalanced at minimum annually and may trade more frequently depending on market conditions. These models may also take on more tactical (short-term) allocations to be closer in line with their non-select counterparts.

Bogart Wealth also manages model portfolios that invest primarily, if not exclusively, in individual equity securities (the "Stock Only Models"). Each of the models carry varying degrees of risk (or volatility) and expected returns and may see different levels of trading frequency on an annual basis. Additionally, Bogart Wealth offers a Structured Note model, a Bond Ladder strategy, a Direct Indexing SMA model, and a Diversified Alternatives strategy. Bogart Wealth's stand-alone Alternative Strategies including private equity, private credit and real estate are made only available to qualified, sophisticated clients as suitable. Below is more information about each of the models managed by Bogart Wealth. From time to time, Bogart Wealth may agree to manage one or more client accounts using a strategy not defined in this brochure, in which case, the client will be informed about the strategy, the types of securities used in managing the account, and the risk profile associated with the strategy.

Global Asset Allocation Models:

Income / Select Income Model: The strategy seeks to maximize total returns, consistent with preservation of principal. The strategy seeks current income and long-term capital appreciation while seeking to minimize fluctuations in portfolio value. It typically invests a large portion of its assets in passive (indexed) and select active funds that focus primarily on investing in traditional, investment grade fixed income securities, but may also seek out investments in below investment grade bonds and equity securities. In addition, the model may invest in higher risk investments such as below investment-grade credit or equity securities. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 95% Bloomberg Barclays Aggregate Bond Index and 5% 90-Day Treasury Bill.

Conservative Growth / Select Conservative Growth Model: The strategy seeks income with growth. The strategy seeks to deliver a conservative mix of current income and long-term capital appreciation while seeking to minimize fluctuations in portfolio value. It typically invests less of its portfolio in securities with fixed income exposure than the Income Model but still has a considerable allocation to securities with fixed-income exposure. The model may invest in a broad spectrum of securities, including credit instruments with varying levels of risk, domestic and international equities of all market-cap sizes and style orientations, and alternative investments (i.e., currency, commodities, and hedging strategies). The model will typically achieve exposure to these investments through passive (indexed) and select active funds. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 35% MSCI All Country World Index / 60% Bloomberg Barclays Aggregate Bond Index / 5% 90 Day Treasury Bill.

Balanced / Select Balanced Model: The strategy seeks capital growth with income. The strategy seeks to deliver a balanced mix of long-term capital appreciation and some current income with expectations of moderate levels of fluctuations in portfolio value. It typically invests less of its portfolio in securities with fixed income exposure than the Conservative Growth Model. The Balanced Models (including Select) may invest in a broad spectrum of securities, including credit instruments with varying levels of risk, domestic and international equities of all market-cap sizes and style orientations, and alternative investments (i.e., currency, commodities, and hedging strategies). The model will typically achieve exposure to these investments through passive (indexed) and select active funds. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 60% MSCI All Country World Index / 35% Bloomberg Barclays Aggregate Bond Index / 5% 90 Day Treasury Bill.

Growth /Select Growth Model: The strategy seeks capital growth. The strategy seeks to deliver long-term capital appreciation with expectations of modest levels of fluctuations in portfolio value. It typically invests even less of its portfolio in securities with fixed income exposure than the Balanced Model. The Growth Models (including Select) may invest in a broad spectrum of securities, including credit instruments with varying levels of risk, domestic and international equities of all market-cap sizes and style orientations, and alternative investments (i.e., currency, commodities, and hedging strategies). The model will typically achieve exposure to these investments through passive (indexed) and select active funds. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 80% MSCI All Country World Index / 15% Bloomberg Barclays Aggregate Bond Index / 5% 90 Day Treasury Bill.

Aggressive Growth / Select Aggressive Growth Model: The strategy seeks aggressive capital growth. The strategy seeks to deliver long-term capital appreciation with expectations of high levels of fluctuations in portfolio value. The model may invest in a broad spectrum of securities, including credit instruments with varying levels of risk, domestic and international equities of all market-cap sizes and style orientations, and alternative investments (i.e., currency, commodities, and hedging strategies). The model will typically achieve exposure to these investments through passive (indexed) and select active funds. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is 95% MSCI All Country World Index / 5% 90 Day Treasury Bill.

Stock Only Strategies:

Prime Income Model: The strategy seeks capital growth with income. The strategy seeks to deliver a mix of long-term capital appreciation and sustainable current income with expectations of high levels of fluctuations in portfolio value. It invests almost exclusively in individual equity securities in various market caps and market segments both internationally and domestically. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 95% Dow Jones US Dividend Select Total Return Index / 5% 90-Day Treasury Bill.

Dividend and Growth Model: The strategy seeks capital and income growth. The strategy seeks to deliver a mix of long-term capital appreciation and long-term growth of income

with expectations of high levels of fluctuations in portfolio value. It invests almost exclusively in individual equity securities in various market caps and market segments both internationally and domestically. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is the S&P 500 Total Return Index.

All Cap Growth Model: The strategy seeks capital growth based on "GARP" (Growth at a Reasonable Price). The strategy seeks to deliver a mix of long-term capital appreciation with expectations of high levels of fluctuations in portfolio value. It invests almost exclusively in individual equity securities in various market caps and market segments both internationally and domestically. The model is reviewed periodically, and the portfolio manager may make changes periodically (as often as daily) based on real-time market developments. The benchmark is a blend of 25% MSCI All Country World Index / 70% S&P 500 Total Return Index / 5% 90 Day Treasury Bill.

Additional Strategies:

Structured Note Model:
The Structured Note model invests in income oriented structured products with the aim to provide a high, non-traditional income source with a high margin of principal protection. This model uses "Yield Notes," which are designed to seek an enhanced yield relative to comparable fixed income or credit investment strategies. These notes pay periodic interest if the underlying indexes/securities attached to the note closes at or above specific threshold levels on observation dates set forth in the structured note's prospectus. We ladder structured notes in client portfolios seeking to aid potential cash flow related issues and to diversify risk based on indexes and threshold levels. Our model targets large, well-known indexes and securities as the note underliers, such as the S&P 500 Index, the Nasdaq 100 Index, the Dow Jones Industrial Average and the Russell 2000 Index.

Bond Ladder: We typically invest in bonds with maturities ranging from 1-8 years. At time of purchase, our strategy targets investment grade rated debt (BBB- minimum credit rating by S&P and/or Baa3 minimum credit rating by Moody's). Although our strategy does not target non-investment grade rated debt, strategies may hold such securities as circumstances dictate. From an asset class perspective, the bond ladder strategies are composed of Treasury and Corporate bonds. We only invest in US bonds. We typically target 1-2 maturities per year. Unless otherwise specified, cash from income and matured/called proceeds will be automatically reinvested per model guidelines.

Direct Indexing SMA:
Using this strategy, when appropriate for a particular client's situation, Bogart Wealth may allocate a portion of the client's investment assets to (or among) an unaffiliated independent investment manager(s) to implement a direct indexing strategy (purchasing individual securities that make up a stock index). The intent of this strategy is to provide customization and to minimize tracking error. The strategy can be designed to mimic a benchmark, can exclude specified stocks, and utilize tax loss selling along the way. When utilizing a direct indexing strategy, the Independent Manager[s] shall have day-to-day responsibility for the active discretionary management of the allocated assets, including, to the extent applicable, proxy voting responsibility. Independent outside manager fees are in addition to Bogart Wealth's standard investment management fee schedule.

Alternative Strategies:

Bogart Wealth offers qualified, sophisticated clients the opportunity to invest a portion of their portfolio among a selection of alternative investments. Alternative investment allocations are achieved by Bogart Wealth's portfolio management team through the use of Interval Funds, each offered by an independent outside manager selected by Bogart Wealth. The categories offered include Private Equity, Private Credit, and Real Estate, as well as a Diversified Strategy comprised of a combination of these categories.

Private equity involves investing in a portfolio of privately owned companies that are not traded on an exchange, potentially including venture capital, growth and buyout firms. Private credit typically refers to investment in loans that are privately negotiated between two parties. Private real estate investments involve tangible property such as buildings and land; this type of investment can be made through a direct transaction for a single property, direct acquisition of a portfolio of assets, or through a diversified commingled fund.

As described in Item 4, these investments fall outside of traditional equity and bond investments. Alternative Strategies are designed for the long-term and are associated with several key potential risks, including liquidity risk. Additional risks may include potential loss of capital, volatility of returns, lack of diversification; reduced transparency; and manager risk.

Independent outside manager fees are in addition to Bogart Wealth's standard investment management fee schedule. Please see outside manager offering materials for additional information on fees and valuation.

C. Material Risks Involved with Investment Strategies

Below is a summary of the material risks associated with the significant strategies and significant methods of analysis used by Bogart Wealth. Investing in securities and other instruments and assets involves risk of loss that clients should be prepared to bear; however, clients should be aware that not all the risks listed below will pertain to every account as certain risks may only apply to certain investment strategies. Furthermore, the risks listed below are not intended to be a complete description or enumeration of the risks associated with the significant strategies and significant methods of analysis used by Bogart Wealth.

Credit Risk. Fixed income investments are subject to credit risk. An issuer's credit quality depends on its ability to pay interest on and repay its debt and other obligations. Defaulted securities (or those expected to default) are subject to additional risks in that the securities may become subject to a plan of reorganization that can diminish or eliminate their value. The credit risk of a security may also depend on the credit quality of any bank or financial institution that provides credit enhancement for the security.

Dividend-Oriented Stocks Risk. Accounts that may invest in dividend-oriented securities carry certain risks. Issuers that have paid regular dividends or distributions to shareholders may not continue to do so in the future. An issuer may reduce or eliminate future dividends or distributions at any time and for any reason. During certain market conditions, the securities of issuers that have paid regular dividends or distributions may not be widely available or may be highly concentrated in particular sectors of the market. The value of a security of an issuer that has paid dividends in the past may decrease if the issuer reduces or eliminates future payments to its shareholders. If the dividends or distributions received by an Account decrease, the Account's performance may be impacted. Equity securities

with higher dividend yields may be sensitive to changes in interest rates, and as interest rates rise, the prices of such securities may fall, which may result in losses to the Account. Additionally, issuers that have paid regular dividends may decrease or eliminate dividend payments in the future, which may result in a decrease in the value of the security and/or an investor receiving less income. In addition, Accounts that invest in equities issued by companies that have paid regular dividends to shareholders may decrease or eliminate dividend payments in the future. A decrease in dividend payments by an issuer may result in a decrease in the value of the security held by the Account or the Account receiving less income. In addition, equity securities with higher dividend yields may be sensitive to changes in interest rates, and as interest rates rise, the prices of such securities may fall.

Equity Securities Risk. Equity securities represent an ownership interest, or the right to acquire an ownership interest, in an issuer. Equity securities also include, among other things, common stocks, preferred securities, convertible stocks and warrants. The values of equity securities, such as common stocks and preferred securities, may decline due to general market conditions which are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the general outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. Equity securities generally have greater price volatility than most fixed income securities.

Independent Managers. Where Bogart Wealth allocates a portion of a client's investment assets to one or more unaffiliated independent investment manager to implement a direct indexing or alternative strategy, the Firm shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors that Bogart Wealth shall consider in recommending Independent Manager(s) include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. Please Note. The investment management fee charged by the Independent Manager(s) is separate from, and in addition to, Bogart Wealth's investment advisory fee disclosed at Item 5. Further, minimum investment thresholds may be set higher by Independent Outside Managers.

Inflation Risk. This is the risk that the value of assets or income from investments will be less in the future as inflation decreases the value of money. As inflation increases, the real value of your assets may decline, and income earned may be of less value.

Issuer Risk. The value of a security may decline for a number of reasons, which directly relate to the issuer, such as management performance, financial leverage, reputation, and reduced demand for the issuer's goods or services, as well as the historical and prospective earnings of the issuer and the value of its assets.

Liquidity and Valuation Risk. Investments in an interval fund (private equity, private credit and real estate alternative investments, as well as any diversified alternative strategy currently offered) involve additional risk, including lack of liquidity and restrictions on withdrawals. During any time periods outside of the specified repurchase offer window(s), investors will be unable to sell their shares of the interval fund. There is no assurance that an investor will be able to tender shares when or in the amount desired. There can also be situations where an interval fund has a limited amount of capacity to repurchase shares and may not be able to fulfill all purchase orders. In addition, the eventual sale price for the interval fund could be less than the interval fund value on the date that the sale was

requested. While an interval fund periodically offers to repurchase a portion of its securities, there is no guarantee that investors may sell their shares at any given time or in the desired amount. Investors should review the independent outside manager's website & materials for the most up-to-date information on fees and valuation. Typically, interval funds are not listed on any securities exchange and are not publicly traded. Therefore, there is no secondary market for the fund's shares.

Market Risks. Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Bogart Wealth's recommendations and/or investment decisions may depend largely upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that Bogart Wealth will be able to predict those price movements accurately or capitalize on any such assumption.

Mutual Funds and ETF Risks. An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders' fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Investments in cryptocurrency exchange-traded funds (ETFs) involve significant risks, including high volatility, regulatory uncertainty, and cybersecurity threats. While cryptocurrency ETFs provide indirect exposure to digital assets, they remain subject to the price fluctuations of the underlying cryptocurrencies, which can be extreme. Additionally, regulatory developments may impact the availability and operation of cryptocurrency ETFs, potentially affecting their liquidity and valuation. Other risks include tracking errors, custodial risks, and the potential for increased fees compared to traditional ETFs. Investors should carefully consider these risks and their risk tolerance before investing in cryptocurrency ETFs.

Passive ETF Risk. Investments in ETFs entail certain risks; in particular, investments in passive ETFs involve the risk that the ETF's performance may not track the performance of the index the ETF is designed to track. Unlike the index, an ETF incurs advisory and administrative expenses and transaction costs in trading securities. In addition, the timing and magnitude of cash inflows and outflows from and to investors buying and redeeming shares in the ETF could create cash balances that cause the ETF's performance to deviate from the index (which remains "fully invested" at all times). Performance of an ETF and the index it is designed to track also may diverge because the composition of the index and the securities held by the ETF may occasionally differ. Although ETFs will generally trade close to net asset value, market volatility, lack of an active trading market for ETF shares, disruptions at market participants (such as Authorized Participants or market makers) and any disruptions in the ordinary functioning of the creation/redemption process may result in ETF shares trading significantly above (at a "premium") or below (at a "discount") net asset value. In addition, errors in the construction, calculation, or transmission of an index could cause an ETF's price to differ materially from its index.

Turnover/Frequent Trading Risk. A change in the securities held by an Account is known as "portfolio turnover." Higher portfolio turnover is a result of frequent trading and involves correspondingly greater expenses to an Account, including brokerage commissions or dealer mark-ups and other transaction costs on the sale of securities and reinvestments in other securities. Such sales may also represent tax risk. The trading costs and tax risk associated with portfolio turnover may adversely affect an Account's performance.

Value Investing Risk. Value investing attempts to identify companies that a portfolio manager believes to be undervalued. Value stocks typically have prices that are low relative to factors such as the company's earnings, cash flow or dividends. A value stock may decrease in price or may not increase in price as anticipated by Bogart Wealth if it continues to be undervalued by the market or the factors that the portfolio manager believes will cause the stock price to increase do not occur. A value investing style may perform better or worse than equity portfolios that focus on growth stocks or that have a broader investment mandate.

Bond Risk: The underlying bond holdings are subject to the credit risk of the underlying issuers. Fixed income securities typically increase in interest rate sensitivity as bond maturities are extended, which increases overall interest rate risk. Bonds may be called prior to maturity, which combined with other factors may lead to reinvestment risk.

Fixed Income Securities. Fixed income securities carry additional risks than those of equity securities. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S. or foreign), and currency risk. If bonds have maturities of ten years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity, the less volatile the price swings. Foreign bonds have liquidity and currency risk.

Covered Call Writing.
Covered call writing is the sale of in-, at-, or out-of-the-money call options against a long security position held in a client portfolio. This type of transaction is intended to generate income. It also serves to create partial downside protection in the event the security position declines in value. Income is received from the proceeds of the option sale. Such income

may be reduced or lost to the extent it is determined to buy back the option position before its expiration. There can be no assurance that the security will not be called away by the option buyer, which will result in the client (option writer) to lose ownership in the security and incur potential unintended tax consequences. Covered call strategies are generally better suited for positions with lower price volatility.

Borrowing Against Assets/Risks. A client who has a need to borrow money could decide to do so by using:

- Margin-The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral; and,
- Pledged Assets Loan- In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges its investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e., custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, Bogart Wealth does not recommend such borrowing unless it is for specific short-term purposes (i.e., a bridge loan to purchase a new residence). Bogart Wealth does not recommend such borrowing for investment purposes (i.e., to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to Bogart Wealth:

- by taking the loan rather than liquidating assets in the client's account, Bogart Wealth continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by Bogart Wealth Bogart Wealth will receive an advisory fee on the invested amount; and,
- if Bogart Wealth's advisory fee is based upon the higher margined account value, Bogart Wealth will earn a correspondingly higher advisory fee. This could provide Bogart Wealth with a disincentive to encourage the client to discontinue the use of margin.

The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loan.

Item 9 Disciplinary Information

Neither Bogart Wealth nor any of its management persons has been involved in any legal or disciplinary events that are required to be disclosed in response to this item.

Item 10 Other Financial Industry Activities and Affiliations

A. Neither Bogart Wealth nor its representatives accept compensation from the sale of securities or other investment product.

B. Neither the Firm, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C. Bogart Wealth has a relationship with Constellation Wealth Capital (CWC), a long-term strategic investor that provides capital solutions exclusively to wealth management businesses and multi-family offices. CWC's minority investment in Bogart Wealth will be used to further enhance the firm's client services, technology solutions, recruitment initiatives, marketing activities, and more.

D. The Firm does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

A. Bogart Wealth has adopted a code of ethics ("Code of Ethics") made up of its personal securities transaction and insider trading policies and procedures.

Clients and prospective clients may contact Bogart Wealth to request a copy of its Code of Ethics.

B. In accordance with applicable regulations, Bogart Wealth maintains and enforces written policies reasonably designed to prevent the unlawful use of material non-public information by Bogart Wealth or any of its Supervised Persons.

C. When Bogart Wealth is purchasing or selling, or considering for purchase or sale, any security on behalf of a client, no Covered Person (as defined below) may effect a transaction in that security prior on the same day, unless the Covered Person is invested in one of Bogart Wealth's models (or until a decision has been made not to trade the security on behalf of a client).

D. Unless specifically defined in Bogart Wealth's procedures (summarized above), neither Bogart Wealth nor any of Bogart Wealth's Associated Persons may effect for himself or herself, for an Associated Person's immediate family (i.e., spouse, minor children, and adults living in the same household as the Associated Person), or for trusts for which the Associated Person serves as a trustee or in which the Associated Person has a beneficial interest (collectively "Covered Persons"), any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Bogart Wealth's clients, unless the transaction is being done as a result of a Covered Person's investment in one of Bogart Wealth's models.

The foregoing policies and procedures are not applicable to (a) transactions effected in any account over which neither Bogart Wealth nor any of its Supervised Persons (as defined in this Form ADV) has any direct or indirect influence or control; and (b) transactions in securities that are: direct obligations of the government of the United States; bankers' acceptances, bank certificates of deposit, commercial paper, and high quality short-term

debt instruments, including repurchase agreements; or shares issued by registered open-end investment companies.

This policy has been established recognizing that some securities being considered for purchase and sale on behalf of Bogart Wealth's clients trade in sufficiently broad markets to permit transactions by clients to be completed without any appreciable impact on the markets of such securities. Under certain limited circumstances, exceptions may be made to the policies stated above. Bogart Wealth will maintain records of these trades, including the reasons for any exceptions.

Item 12 Brokerage Practices

A. Client assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. Bogart Wealth generally requires that client accounts be maintained at Charles Schwab & Co., Inc. ("Schwab") or Fidelity Investments ("Fidelity"). Our firm is not affiliated with Schwab or Fidelity. The qualified custodians will hold client assets in a brokerage account and buy and sell securities when instructed. While our firm recommends that clients use Schwab or Fidelity as custodian/broker, clients will decide whether to do so and open an account with Schwab or Fidelity by entering into an account agreement directly with them. Prior to engaging Bogart Wealth to provide investment management services, the client will be required to enter into a formal wealth management agreement with Bogart Wealth setting forth the terms and conditions under which Bogart Wealth shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Bogart Wealth considers in selecting and recommending Schwab or Fidelity (or any other broker-dealer/custodian to clients) include historical relationship with Bogart Wealth, financial strength, reputation, execution capabilities, pricing, research, and service. Although the transaction fees paid by Bogart Wealth's clients shall comply with Bogart Wealth's duty to seek best execution. Accordingly, although Bogart Wealth will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

Bogart Wealth periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to seek best execution.

1. Non-Soft Dollar Research and Benefits
   Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Bogart Wealth receives from Schwab and/or Fidelity (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Bogart Wealth to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Bogart Wealth can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events,

computer hardware and/or software and/or other products used by Bogart Wealth in furtherance of its investment advisory business operations.

Certain of the above support services and/or products assist Bogart Wealth in managing and administering client accounts. Others do not directly provide such assistance but rather assist Bogart Wealth to manage and further develop its business enterprise.

There is no corresponding commitment made by Bogart Wealth to Schwab, or any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

Transition Assistance

In connection with the transition of certain Bogart Wealth clients to Fidelity's custodial platform, Bogart Wealth may receive financial transition support. Any transition support received from Fidelity would be used to minimize expenses incurred by clients as they transition to the Fidelity custodial platform ("Transition Assistance").

Bogart Wealth's receipt of Transition Assistance creates a conflict of interest because it creates a financial incentive to recommend clients transfer their custodial relationship to Fidelity. Furthermore, the receipt of such benefits could be dependent on maintaining clients' assets with Fidelity for a certain period of time. Bogart Wealth attempts to mitigate these conflicts of interest by evaluating and recommending that clients use Fidelity's services based on the benefits that such services provide to its clients, rather than the Transition Assistance received. No client is under any obligation to transfer or custody their assets with Fidelity.

Bogart Wealth's Chief Compliance Officer, Suzanne Kellogg, remains available to address any questions that a client or prospective client may have regarding the above arrangement and the conflict of interest it creates.

2. Bogart Wealth does not receive referrals from broker-dealers.

3. Bogart Wealth recommends that its clients utilize the brokerage and custodial services provided by Schwab or Fidelity. Bogart Wealth generally does not accept 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 Bogart Wealth 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 Bogart Wealth. As a result, a 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. In the event that the client directs Bogart wealth to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available

through Bogart Wealth. Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

B. Transactions for each client account generally will be effected independently unless Bogart Wealth decides to purchase or sell the same securities for several clients at approximately the same time. Bogart Wealth may (but is not obligated to) combine or "bunch" such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among Bogart Wealth's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Due to using more than one custodian, client accounts within a particular strategy are not typically batch traded through the same broker-dealer. Custodians used by clients charge a fee for each trade executed by a different broker-dealer, and for that reason we normally execute trades for those accounts with their custodian's affiliated broker-dealer. We have determined that having those clients trade through their custodian's broker-dealer for most trades minimizes trading costs and is consistent with our duty to seek best execution. To fairly incorporate all relationship types within the firm's strategy trade execution procedures, alternation will be used to schedule the order in which each platform is executed. Under this procedure, transactions for accounts participating in that particular execution block within a specific trading platform generally will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. When allocating trades, we strive to treat clients fairly and equitably. For employee accounts and accounts of family members managed by the Firm, trades are managed in accordance with this policy. Bogart Wealth does not receive any additional compensation or remuneration as a result of such aggregation.

   In the event that Bogart Wealth determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares will be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when such account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares will be reallocated to other accounts (this will be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations will be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Bogart Wealth may exclude the account(s) from the allocation; the transactions will be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares will be allocated to one or more accounts on a random basis.

Item 13 Review of Accounts

A portfolio manager reviews each of the models on a periodic basis and may make changes periodically. The model portfolios are subject to ongoing supervision by the Firm's Investment Portfolio Committee and the Investment Portfolio Committee may change a

model portfolio's asset allocation or securities within a model portfolio, which will then generally be implemented in client's portfolios.

Bogart Wealth manages client accounts according to its models, and therefore account rebalancing and transactions are usually done without regard to a client's individual tax ramifications.

In addition to a review of the model, individual accounts are reviewed for account drift, withdrawals and deposits, and upon client request and may be rebalanced depending on these reviews.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions. Investment management clients also receive reports from Bogart Wealth that may include relevant account and/or market-related information, such as an inventory of account holdings and account performance, on a quarterly basis. Clients should compare any supplemental reports they receive from Bogart Wealth with the account statements they receive from the Financial Institutions.

Item 14 Client Referrals and Other Compensation

A. As indicated at Item 12 above, Bogart Wealth may receive from Schwab or Fidelity without cost (and/or at a discount), support services and/or products. There is no corresponding commitment made by Bogart Wealth to Schwab, Fidelity, or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements.

B. Bogart Wealth compensates non-employees for client referrals. Such referral arrangements must comply with the SEC's "Marketing Rule" (Rule 206(4)-1). We enter into a written agreement with the promoter that describes the nature and terms of the relationship between the promoter and Bogart Wealth. Clients and/or potential clients who are referred by the promoter will be provided disclosure that describes the nature of the relationship between the promoter and Bogart Wealth, and the compensation arrangement. The promoter will be compensated with a portion of the annual investment advisory service fees collected by Bogart Wealth from each client that was referred by the promoter to Bogart Wealth. This referral fee is a percentage of the fee paid to Bogart Wealth by the client. We do not charge referred client's investment advisory service fees greater than those charged to new Bogart Wealth clients with similar portfolios managed by Bogart Wealth who were not introduced by a promoter.

Item 15 Custody

The wealth management agreement and/or the separate agreement with any Financial Institution generally authorize Bogart Wealth to debit client accounts for payment of the Firm's fees and to directly remit those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as qualified custodians for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Bogart Wealth.

In addition, as discussed in Item 13, Bogart Wealth may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Bogart Wealth.

Certain clients have established asset transfer authorizations, which permit qualified custodians to rely upon instructions from Bogart Wealth to transfer client funds or securities to third parties. These arrangements are disclosed at ADV Part 1, Item 9, but in accordance with the guidance provided in the SEC's February 21, 2017, Investment Adviser Association No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination.

Item 16 Investment Discretion

Where appropriate, Bogart Wealth is given the authority to exercise discretion on behalf of clients. Generally, all accounts invested in a Bogart Wealth model strategy are managed on a fully discretionary basis. Bogart Wealth is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking their consent. Bogart Wealth is given this authority through a limited power-of-attorney included in the agreement between Bogart Wealth and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold).

Item 17 Voting Client Securities

Unless a client directs otherwise in writing, Bogart Wealth, in conjunction with the proxy voting and due diligence services provided by Broadridge Financial Solutions, Inc. and its ProxyEdge platform, or its successors or assigns, shall be responsible for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted. Bogart Wealth and/or the client shall correspondingly instruct each custodian of the assets to forward to Bogart Wealth copies of all proxies and shareholder communications relating to the assets. Bogart Wealth, in conjunction with the services provided by Broadridge Financial Solutions, Inc., shall monitor corporate actions of individual issuers and investment companies consistent with Bogart Wealth's fiduciary duty to vote proxies in the best interests of its clients. With respect to individual issuers, Bogart Wealth may be solicited to vote on matters including corporate governance, adoption or amendments to compensation plans (including stock options), and matters involving social issues and corporate responsibility.

With respect to investment companies (e.g., mutual funds), Bogart Wealth may be solicited to vote on matters including the approval of advisory contracts, distribution plans, and mergers. Bogart Wealth shall maintain records pertaining to proxy voting as required pursuant to Rule 204-2(c)(2) under the Advisers Act. Copies of Rules 206(4)-6 and 204-2(c)(2) are available upon written request. In addition, information pertaining to how Bogart Wealth voted on any specific proxy issue is also available upon request. Where Bogart Wealth allocates a portion of the client's investment assets to an unaffiliated independent investment manager to implement a direct indexing strategy, the independent manager shall have proxy voting responsibility. Bogart Wealth does not process class action claims for securities currently or previously held in client portfolios. Bogart may

pass along reports to the client upon request to assist them in their completion of class action securities claims processing.

Item 18 Financial Information

A. The Firm does not require or solicit the prepayment of more than $1,200 in fees six months or more in advance.

B. The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

C. The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.