

Firm Brochure
(Part 2A of Form ADV)



6099 Frantz Road

Dublin, OH 43017

PHONE: 614-760-0670

FAX: 614-760-0675

EMAIL: gary@safeharborrg.com

WEBSITE: safeharborrg.com

This brochure provides information about the qualifications and business practices of Safe Harbor Wealth Management, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 614-760-0670 or by email at gary@safeharborrg.com. 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 Safe Harbor Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov

February 1, 2012

Item 2: Material Changes

Annual Update

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

Material Changes since the Last Update

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last update on August 8, 2011, no material changes have been made.

Full Brochure Available

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

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Item 4: Advisory Business

Firm Description

Safe Harbor Wealth Management, LLC (“Safe Harbor”) was founded in 2010. Gary Sickles is 100% owner.

Safe Harbor provides personalized confidential financial planning and solicits for third party investment managers to individuals. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Safe Harbor is a fee-based financial planning firm. The firm’s Managing Member is affiliated with an entity that sells financial insurance products

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis.

Types of Advisory Services

Safe Harbor furnishes investment advice through consultations.

On more than an occasional basis, Safe Harbor furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Safe Harbor on a fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. A conflict of interest exists between the interests of the investment advisor and the interests of the client. The client is under no obligation to act upon the investment advisor’s recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Safe Harbor. Financial plans will be completed and delivered inside of thirty (30) days.

SOLICITORS

Safe Harbor solicits the services of Third Party Money Managers to manage client accounts. In such circumstances, Safe Harbor receives solicitor fees from the Third Party Manager. This is detailed in Item 10 of this brochure.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

Safe Harbor does not participate in wrap fee programs.

Client Assets under Management

Safe Harbor does not manage client assets.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Safe Harbor bases its fees on a fixed rate and solicitor fees from third party money managers.

FINANCIAL PLANNING and CONSULTING

Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. The payments are received in two installments: One half at the commencement of the planning process and the balance of the final payment is due upon delivery of completed plan. All plans are completed and delivered inside of ninety (90) days. Client may cancel within five (5) business days for a full refund. If client cancels after five (5) business days, client will be due a pro-rata refund or RFP will be entitled to a pro-rata fee for work completed whichever is applicable.

FIXED FEES

Financial Planning Services are offered based on a negotiable fixed fee with a maximum of \$2,500 based on complexity and unique client needs. Prior to the planning process the client is provided a plan fee and approximation of time for completed services.

Client Payment of Fees

Fees for financial plans are billed 50% in advance with the balance due upon delivery of the plan.

Additional Client Fees Charged

When utilizing Third Party Money Managers, the custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Safe Harbor, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Prepayment of Client Fees

Financial Plans are billed 50% in advance. Client may cancel within five business days of signing the Investment Advisory Agreement for a full refund. If client cancels

after five (5) business days, client will be due a pro-rata refund or RFP will be entitled to a pro-rata fee for work completed whichever is applicable.

External Compensation for the Sale of Securities to Clients

Safe Harbor does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Safe Harbor.

Item 6: Performance-Based Fees

Sharing of Capital Gains

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

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

Item 7: Types of Clients

Description

Safe Harbor generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

While Safe Harbor does not require a minimum to open an account, specific money managers may have a minimum to open an account. Minimum requirements by third party money managers will be disclosed in each money manager's brochure.

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

Methods of Analysis and Investment Strategies

If evaluating securities is part of the agreed upon financial planning, Safe Harbor may use fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy and Method of Analysis Material Risks

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth.

Technical analysis involves evaluating securities based on past prices and volume.

Cyclical analysis involves analyzing the movement of a security against the cycles of the market.

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

Security Specific Material Risks

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

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the

inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action required to be reported.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings required to be reported.

Self Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Safe Harbor nor any of its employees are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Safe Harbor nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Gary Sickles has a financial affiliated business as an insurance agent. From time to time, he will offer clients advice or products from those activities. Approximately 50% of Mr. Sickles' time is spent on his insurance practice.

These practices represent conflicts of interest because it gives Mr. Sickles an incentive to recommend products based on the commission or fee amount received. This conflict is mitigated by the fact that Mr. Sickles has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products. Clients have the option to purchase these products and/or through another insurance agent or investment advisor of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Safe Harbor solicits the services of Third Party Money Managers to manage client accounts. In such circumstances, Safe Harbor receives solicitor fees from the Third Party Manager. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Safe Harbor. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services are based on a

percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule is attached to Exhibit C in Safe Harbor 's Investment Advisory Agreement.

This solicitor relationship is disclosed to the client in each contract signed between the client and Safe Harbor and the client and the Third Party Money Manager. Safe Harbor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client initials Safe Harbor 's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including ADV Part 2 disclosures.

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

Code of Ethics Description

The employees of Safe Harbor have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Safe Harbor employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Safe Harbor. The Code reflects Safe Harbor and its supervised persons’ responsibility to act in the best interest of their client.

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

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

Safe Harbor’s Code is based on the guiding principle that the interests of the client are our top priority. Safe Harbor’s officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the potential for conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Safe Harbor and its employees do not recommend to clients securities in which we have a material financial interest.

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

Safe Harbor and its employees may buy or sell securities that are also held by clients. In order to avoid conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Safe Harbor with copies of their brokerage statements.

The Chief Compliance Officer of Safe Harbor is Holly Swearingen. She reviews all employee trades each quarter. The personal trading reviews helps mitigate that the personal trading of employees does not affect the markets and that clients of the firm have received preferential treatment over employee trades.

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

Safe Harbor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Safe Harbor may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. Safe Harbor will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Safe Harbor relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Safe Harbor.

- *Directed Brokerage*
Safe Harbor utilizes Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- *Best Execution*
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. Safe Harbor does not exercise discretion of client accounts.
- *Soft Dollar Arrangements*
Safe Harbor does not maintain any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

Safe Harbor does not trade for its or its clients accounts and therefore aggregation of securities transactions is not applicable.

Item 13: Review of Accounts

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

Account reviews are performed quarterly by Gary Sickles, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and an additional review is done only upon request of client.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

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

Under financial planning services, the client will receive a one-time written financial plan.

Item 14: Client Referrals and Other Compensation

Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Safe Harbor does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Safe Harbor does not compensate for client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the Third Party Money Managers.

Item 16: Investment Discretion

Discretionary Authority for Trading

Safe Harbor does not accept discretionary authority to manage securities accounts on behalf of clients.

Item 17: Voting Client Securities

Proxy Votes

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

Item 18: Financial Information

Balance Sheet

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

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

Safe Harbor has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither Safe Harbor nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

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

None to report

Supervised Person Brochure

Part 2B of Form ADV

Gary Sickles



This brochure supplement provides information about Gary Sickles and supplements the Safe Harbor Wealth Management, LLC brochure. Being registered as a registered investment adviser does not imply a certain level of skill or training. Please contact Gary Sickles if you did not receive Safe Harbor Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Gary Sickles is available on the SEC's website at www.adviserinfo.sec.gov.

February 1, 2012

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officers and Management Persons

Gary Joseph Sickles

Educational Background:

- Year of birth: 1951
- No formal post high school education

Business Experience:

- Safe Harbor Wealth Management, LLC; Managing Member/Investment Adviser Representative; 04/2011 - Present
 - Safe Harbor Retirement Group, LLC; Insurance Sales; 03/2005 - Present
 - Senior Benefits; Insurance Sales; 03/2000 - 03/2005
-

Disciplinary Information

None to report

Other Business Activities

Managing Member Gary Sickles has a financial industry affiliated business as an insurance agent. From time to time, he will offer clients advice or products from those activities. More than 50% of his revenue results from commissions from the sale of insurance products. As an insurance agent, he may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Sickles an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Sickles has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Performance Based Fee Description

Managing Member Gary Sickles does not receive any performance based fees.

Supervision

Since Gary Sickles is the sole owner and investment adviser representative of Safe Harbor Wealth Management, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Requirements for State-Registered Advisors

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None
