



FRONT STREET
WEALTH MANAGEMENT

Firm Brochure

Part 2A of Form ADV as of March 27, 2024

Front Street Wealth Management

*is the independent, fee-only, wealth advisory firm
for individuals, families and trusts who value
proactive management of their investments
and a deeper confidence in their wealth.*

This brochure provides information about the qualifications and business practices of Front Street Wealth Management. If you have any questions about the contents of this brochure, please contact us at (231) 947-3775 or info@frontstreet.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. The terms “registered investment adviser” or references to being “registered” does not imply a certain level of skill or training. Additional information about Front Street Wealth Management also is available on the SEC’s website at www.adviserinfo.sec.gov

Front Street Wealth Management

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Traverse City, Michigan 49684
(231) 947-3775
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Item 2 - Material Changes

Material Changes since March 29, 2023

Since our last published ADV Part 2A and Part 2B, there are no material changes to Front Street Wealth Management's operations or service.

Full Brochure Available

Whenever you would like to receive a copy of our Firm Brochure, please call (231) 947-3775 or email us at info@frontstreet.com. We do publish our latest version of our Firm Brochure/Form ADV at www.FrontStreet.com/adv

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Item 4 - Advisory Business

Firm Description

Front Street Wealth Management, LLC (Front Street) was founded in early 2003. Front Street's principal and sole owner is Jason P. Tank, CFA, CFP®, EA.

As of March 27, 2024, we managed \$61.1 million on a discretionary or non-discretionary basis on behalf of 49 clients and provided administrative services covering \$7.4 million on behalf of 16 clients.

We currently have two people serving clients, including one full-time employee who fulfills administrative duties for Front Street.

As a fee-only firm, we do not sell any financial products and we do not accept any commissions or referral fees, in any form. Our clients are the only parties that pay us for the advice and service we provide.

At the outset of our relationship with you, we work to define your financial and investment objectives to help you develop and achieve your unique financial objectives.

We offer two types of *ongoing services*: (a) *wealth management* and (b) *administrative services*. We also offer standalone *financial planning* delivered in a single session or on a project basis.

While we don't act as a custodian of your investment accounts, we do recommend that you use a certain custodian. After your accounts are opened *in your name* with the chosen account custodian(s), we are granted *limited powers* by you to place trades and to conduct administrative functions for you.

At your request, we will recommend other professionals that you may also need (e.g., attorneys, accountants, insurance agents, real estate agents, etc.) As a fee-only firm, you should know that we receive no referral fees when making these professional recommendations.

Types of Advisory Services

Our primary service is designed for *wealth management* clients. Our other services are designed for *administrative service* clients or *financial planning* clients.

For our *wealth management* clients, our core day-to-day service is our discretionary management of your investment accounts along with the delivery of comprehensive financial planning advice and our day-to-day administrative services.

For our *administrative service* clients, between our annual review meetings, our day-to-day service is to maintain and rebalance your portfolio in accordance with agreed-upon investment guidelines along with the performance of other administrative duties.

For our *financial planning* clients, we deliver relevant and comprehensive financial planning advice performed in either a single session or on a project basis.

It's important to explain how our discretionary management relationship differs from a non-discretionary relationship. Where a non-discretionary relationship would require your approval *prior to any trading activity* in your account, our discretionary management relationship grants us this trading authority *within agreed-upon investment guidelines determined at the outset of our relationship with you*.

At your request, we will hold aside certain assets in your accounts or within separate accounts on an unsupervised basis. As unsupervised assets, we are not responsible for reviewing or

analyzing them and we will not provide ongoing advice or take any actions with them. For our ongoing *wealth management* clients, we also offer cash management-only accounts. We do not charge an investment management fee on assets or accounts considered to be either unsupervised or for cash management-only purposes.

Types of Agreements

We ask you to sign an agreement with us that acts as a guide to the service we provide to you, depending on the type of service that fits your needs.

When you hire us as a *wealth management* client, the services we perform are subject to our *Wealth Management Agreement* that includes a customized *Investment Guidelines* section as well as our *Advisory Fees* schedule that entitles you to unlimited financial planning and administrative services.

When you hire us as an *administrative services* client, the services we perform are subject to our *Advisory and Administrative Services Agreement* that primarily includes portfolio rebalancing within agreed-upon investment guidelines. An annual review meeting is highly encouraged and included within the agreement.

When you hire us as a *financial planning* client, the services we perform are subject to our *Financial Planning Agreement* that details the financial advice we will provide to you.

For our *wealth management clients*, we review and analyze your financial life to help determine your overall financial objectives and investment goals as well as the amount of risk that we determine is prudent for you. As a matter of practice, we do not independently verify the information you provide, and we do expect you to notify us when there are significant changes in your financial life.

Within our *Wealth Management Agreement* is our *Investment Guidelines* section that describes your parameters for investment risk, your overall asset allocation, and the diversification requirements we will follow when managing your portfolio. This section will also detail any special investment restrictions or limitations you'd like in place.

Our *financial planning advice* may include areas such as retirement readiness planning, performing a retirement income analysis, providing general tax advice, tax preparation and estate planning reviews, reviewing your insurance needs, and providing advice on college savings, among other areas related to your financial life.

With regard to estate planning reviews, you should know that we are not legal professionals, and we consider it wise for you to seek specific and qualified outside counsel to address more complex, legal matters.

Types of Investments

We typically manage portfolios that are considered *balanced*, meaning they often include a mix of multiple asset classes such as equities, fixed income, and cash. *For both the equity and fixed income segments of your portfolio* we utilize diversified, low-cost index funds.

However, as stipulated in your *Investment Guidelines*, we do reserve the right to invest in individual equities that are publicly traded and listed either on a domestic stock exchange, an over-the-counter market or traded on a foreign exchange. We also may invest in individual bonds, such as U.S. Treasury and other government agency securities, corporate bonds, municipal bonds, commercial paper, and certificates of deposit.

Termination of Agreement

You may terminate our *Wealth Management Agreement* or *Advisory and Administrative Services Agreement* at any time by notifying us in writing. Upon the termination of our relationship, as described in detail below, we will refund to you any investment management fees that we have not yet earned.

Item 5 - Fees and Compensation

Description

Our fee schedule for our *wealth management* clients is based on the value of the assets you have placed under our management, as measured on the final day of the preceding calendar quarter. Our wealth management fee is typically charged on a blended, tiered fee schedule, based on portfolio size. Our initial fee tier is 1.35% per year and our final fee tier is 0.15% per year, paid in advance and charged in quarterly segments. For *administrative service* clients, and occasionally for *wealth management* clients, we will offer a flat fee arrangement. While not strictly applied, our minimum annualized fee for new *wealth management* clients is \$10,000.

Financial Planning sessions or projects involve one or more fact-discovery meetings or calls, follow-up communications and the delivery of our financial advice. Depending on the level of complexity or financial planning needs, the cost can range from a minimum of \$1,500 for a single planning session to a minimum of \$5,000 for a comprehensive planning project.

We reserve the right to adjust our standard fee schedule based upon certain criteria. These criteria may include, among others, the anticipation of additional assets to be managed by us, the current level of your assets placed under our management, the tenure of our relationship with you, the existence of related clients of our firm, your overall portfolio management preferences and/or restrictions, individual client circumstances and complexities and, naturally, our desire to provide pro bono or discounted services.

Fee Billing Process

Our ongoing wealth management fees are *billed quarterly, in advance*.

Your total portfolio value – excluding any unsupervised assets or cash management-only accounts – as of the last day of the preceding calendar quarter is used as the basis for our fee calculation for the current quarter.

Typically, we produce and present your *Statement of Management Fees* within the first two weeks following the end of the preceding calendar quarter. As a *wealth management* or *administrative service* client, with your advance consent, our fee is deducted from one or more of your designated accounts. Additional payment options are available.

If you decide to terminate our *Wealth Management Agreement* or *Administrative Service Agreement* prior to the end of a calendar quarter, we will refund any unearned portion of the advance payment of the fee within five (5) business days of the date of a notice of termination.

Third-Party Fees

Your account custodians can charge trading fees for the purchase or sale of securities within your account. Also, when we invest in open-end, closed-end and exchange-traded mutual funds you will pay various *internal* fees. These internal fees are commonly referred to as a fund's *expense ratio* that includes investment management and operational fees. These fees are in

addition to the management fee you pay us. This is one reason we typically utilize *low-cost index funds*. As a purely fee-only firm, we do not receive any of these additional fees.

Item 6 - Performance-Based Fees

Sharing of Capital Gains

Our fees are not charged based on a share of your portfolio's overall investment return. We feel this method of performance-based compensation presents potential conflicts of interest. In our opinion, it creates an incentive for an adviser to invest in assets that may carry a higher degree of risk. We simply avoid this incentive by not accepting performance-based fees.

Item 7 - Types of Clients

Description

We typically serve individuals, couples, and trusts. As part of our service, we manage the typical spectrum of account types. These include taxable accounts, such as individual accounts, joint accounts, trust accounts as well as various types of tax-deferred or tax-free accounts.

While we specialize in serving individuals, couples and trusts, our service is applicable for a wide range of clients, such as pension and profit-sharing plans, charitable organizations as well as other business entities.

Account Minimums

While we do not impose a strict minimum portfolio size for new *wealth management* client relationships, we do feel it is our obligation to honestly judge our professional capacity to serve clients in a manner consistent with a *high-quality, standard of care* for our current clients. For this reason, our informal relationship portfolio minimum for *wealth management* clients is approximately \$750,000 in assets under our care with a minimum annualized fee of \$10,000.

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

Our Portfolio Management Process

Client Risk Assessment: At the beginning of any new client relationship, and when appropriate along the way, we will together determine an appropriate level of risk for your portfolio. Our risk assessment process is based on an analysis of your current financial situation. For lack of a better-accepted definition, we consider risk to be the volatility of your portfolio.

Investment Guidelines: As part of our *Wealth Management Agreement* and *Administrative Services Agreement*, our *Investment Guidelines* section must be agreed-upon before we will make any investments in your accounts. These guidelines state the risk level that you are willing to assume in your portfolio, in addition to the asset allocation thresholds and diversification requirements we will follow.

Security Selection: For both the equity and fixed income segments of your portfolio we utilize diversified, low-cost index funds. As stipulated in your *Investment Guidelines*, we do reserve the right to invest in individual equities and bonds. We use a flexible and disciplined approach to security selection that is founded on value-investing principles and independent research.

Valuation Criteria: We prefer to invest when valuations are on the lower end of historical ranges. The valuation criteria we use include, among other measures, price-to-earnings ratio, price-to-cash flow ratio, price-to-sales ratio, and price-to-book value ratio. Our criteria are typically based on, but are not limited to, a combination of income statement and balance sheet analysis.

Diversification: Our use of low-cost index funds that track broad market indexes results in wide diversification in your portfolio. If we decide market conditions warrant such a defensive stance, we reserve the right to invest less in stocks or bonds than your portfolio's *asset allocation target* shown in your *Investment Guidelines*.

Hedging Strategies: We may use equity hedging strategies in our risk management process and when we determine there to be potential significant downside risks in the stock or bond market. It is important to highlight, while our hedging strategies are designed to reduce risk in your portfolio, these strategies could potentially create portfolio losses in a rising market.

Our Aggregation of Orders & Trading

When we decide to buy, sell, or adjust the position size of a particular investment we utilize portfolio management software that applies various rebalancing rules against an internally developed model portfolio. Using our portfolio rebalancing software, we approve, in a two-stage process, a proposed trade and an executed trade in your portfolio.

While rare, some trades for client accounts that qualify to use the Schwab's *Prime Broker* service may be executed with brokers other than Schwab. When this service is used, Schwab does charge a special fee for the trades executed with other brokers. We only use this service when we believe this is advantageous for you.

Risk of Loss

All investment programs carry risks for investors, such as:

Interest-rate Risk: Fluctuations in interest rates may cause the price of financial assets to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values or prices to decline.

Market Risk: The price of a security, bond, or mutual fund may decline in reaction to identifiable and sometimes unidentifiable events and market conditions.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. These risks are traditionally viewed as unrelated or uncorrelated with market-based risks described above.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding away at the rate of inflation.

Currency Risk: Foreign investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is commonly referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from the sale or maturity of an investment may have to be reinvested at a potentially lower rate of return (i.e., interest rate) than existed at the time of the initial investment.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, securities are more liquid if there are many buyers and sellers.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of lower profitability or losses when revenues decline because the company must meet the terms of its obligations. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or declining market value.

Item 9 - Disciplinary Information

Legal and Disciplinary

Our firm and its employees have not been involved in any legal or disciplinary events related to past or present clients involving items such as criminal or civil actions, administrative proceeding, and self-regulatory proceedings.

Item 10 - Other Financial Industry Activities and Affiliations

Activities and Affiliations

Our firm's members and employees do not participate in any other industry business activities. Additionally, the members and employees of our firm do not have arrangements that are material to our advisory business or our clients with any related person.

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

Code of Ethics

Front Street's *Code of Ethics* is based on the principle that we have a fiduciary duty to place the interest of our clients ahead of our interests or the interest of our firm. Our *Code of Ethics* applies to all employees. Employees must avoid activities, interests, and relationships that might interfere with making decisions in the best interests of our clients.

Employees of our firm may not induce or cause a client to act, or not act, for their personal benefit, rather than for the benefit of the client. For example, an employee would violate the policy by causing a client to purchase a security he or she owned for the purpose of increasing the price of that security.

Our employees must also avoid taking inappropriate advantage of their position. The receipt of investment opportunities, perquisites or gifts from persons seeking business with us or with you, could call into question the exercise of the independent judgment of an employee. Employees may not, for example, use their knowledge of portfolio transactions to profit by the market effect of such transactions.

Lastly, our employees must conduct all personal securities transactions in full compliance with our *Code of Ethics* including its reporting requirements. Doubtful situations always should be resolved in favor of the clients.

Retirement Rollovers Potential for Conflict of Interest

When you leave your employer, you typically have *four options* regarding your existing retirement plan (and you certainly may engage in a combination of these options):

- *Leave the money in the former employer's plan*
- *Rollover the money to your new employer's plan*
- *Rollover the money to an IRA*
- *Cash out the account*

If we recommend that you rollover your retirement plan assets into an account to be managed by us, it creates an inherent conflict of interest. We might earn additional compensation as a result of the rollover. Of course, you are never under any obligation to rollover your retirement plan assets to an account managed by us, whether it is from an employer's plan or an existing IRA.

When we provide investment advice to you regarding your retirement plan account or IRA, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code. These are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act your best interest and not put our interests ahead of you. Under this special rule's provisions, we must:

- *Provide Prudent Advice:* Meet a professional standard of care when making investment recommendations
- *Provide Loyal Advice:* Never put our financial interests ahead of yours when making recommendations
- *No Misleading Statements:* Avoid misleading statements about conflicts of interest, fees, and investments
- *Best Interest:* Follow policies and procedures designed to ensure that we give advice that is in your best interest
- *Charge Reasonable Fees:* Charge no more than is reasonable for our services
- *Disclose Conflicts:* Give you basic information about conflicts of interest.

Personal Trading & Participation or Interest in Client Transactions

Our employees may buy or sell securities that are also held by our clients. However, employees may not trade their own securities ahead of our clients' trades. We have developed detailed *Written Policies and Procedures* regarding personal trading and employees must comply with its provisions.

The personal trading and investment activities of employees of investment advisory firms are the subject of various state and federal securities laws and regulations.

The Chief Compliance Officer (CCO) of Front Street Wealth Management is Jason Tank. He reviews all employee trades each quarter. His trades are reviewed by Jean Clous. The personal trading reviews ensure that the personal trading of employees does not affect the market and that clients of the firm receive preferential treatment.

When employees trade in their own accounts, conflicts of interest may arise between clients and employees and their immediate families. The conflicts may include *taking an investment opportunity from clients, using the advisory position or relationship to take advantage of available investments and front-running, which may include advantageously trading before making a trade for a client*

Our employees are highly discouraged from trading in securities that are currently being traded for clients' accounts *until after all clients' trades for those securities have been executed*. However, if an employee desires to trade the same day in a security that has been traded on behalf of clients' accounts, *they must execute their personal trade at the same or worse price than the average price allocated to the clients' accounts*.

Each employee will provide a most recent copy of the custodial statement for each account that contains reportable securities, and they have a direct or indirect beneficial interest in within 10 days of their employment date.

We require that each employee report, on a quarterly basis, personal transactions in any reportable in all their own accounts and accounts of any immediate family member. In

addition, if their account(s) contain reportable securities, copies of their account statements will also be provided annually.

Item 12 - Brokerage Practices

Selecting Brokerage Firms

As an independent and fee-only firm, we do not have any affiliation with product sales or brokerage firms. Specific custodian recommendations are made to our clients based on their need for such services and our opinion of the quality of the services provided by the custodian. We recommend custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

We recommend *Charles Schwab* as the brokerage firms for all clients' accounts. We review the appropriateness of our recommendation on an annual basis. It's important to note that, as a purely fee-only firm, we do not receive any compensation from *Charles Schwab*.

Charles Schwab makes available various complimentary services that benefit us in managing and administering your accounts. For example, both provide us with electronic access to your account data, the ability to collect our investment management fees and provide support with various administrative functions. Additionally, they make available to us ancillary services created to help us better manage our overall business, such as their publication of regulatory compliance matters that enable us to keep abreast of possible industry best practices.

Best Execution

As a fiduciary to you, we work to provide the best possible execution of securities transactions for clients under the circumstances of the particular transaction.

We must execute securities transactions for our clients in such a manner that the total cost or proceeds in each transaction are the most favorable under the circumstances. Typically, to achieve the best execution, we may aggregate client trade orders as previously discussed.

We consider the full range and quality of a broker's services in recommending brokerage services, including, but not limited to the value of research provided as well as execution capability, commission rate, the ability to negotiate commissions, the ability to obtain volume discounts, financial responsibility, and responsiveness to us and our clients. The determinative factor is not the lowest commission cost but whether the transaction represents the best qualitative execution for the managed account.

We will monitor the execution of trades and settlements of the selected brokerage firms on an ongoing basis. Any problems with trade executions or settlements will be noted in a written report and sent to our Chief Compliance Officer, Jason P. Tank, who maintains files on each brokerage account.

Annually, our Chief Compliance Officer will review the broker files and ask all employees with trading responsibilities to submit a written evaluation for each broker who has been used in the prior year to execute trades. Their evaluation will include a description of the broker's trade execution capabilities, responsiveness, reasons for using the broker, and other products or services provided by the broker's firm and an opinion as to whether the broker's services should be retained for the coming year.

Our Chief Compliance Officer will also be responsible for reviewing brokerage commission rates and costs on an annual basis to ensure that they are still competitive within the brokerage industry.

Soft Dollars

We do not participate in any soft dollar programs in which trading commissions from clients' accounts are used by us to pay for equipment, research, or other services. Soft dollar programs can be described as directing trading activity to specific brokerage firms in exchange for an indirect form of compensation. The indirect nature of this form of compensation is the reason it is referred to as "soft" as opposed to "hard" dollars.

Item 13 - Review of Accounts

Periodic Reviews

While clients' portfolios are reviewed many times each month by Jason Tank as part of our ongoing investment management process, we also adhere to a structured and consistent review process to help ensure that our clients' portfolios are being managed according to their *Investment Guidelines* and our current investment strategy.

With our review process, we monitor your portfolio's asset allocation relative to our agreed-upon guidelines and restrictions. Additionally, our clients' portfolio returns are reviewed to identify material deviations from the expected returns over various time periods.

Client Account Statements and Reports

We produce a quarterly report that can be customized to fit your needs and desires. Our typical report will include a listing of your accounts and investments along with their market value, along with a broad overview to help you gain an understanding of the progress of your portfolio and a detailed *Statement of Management Fees* for your review. Every client is given password-protected online access to our website that offers more-frequently updated portfolio information and periodic investment commentary.

Item 14 - Client Referrals and Other Compensation

Referrals Received

We have been fortunate to receive many client referrals over the years. We do not compensate referring parties for making these referrals.

Referrals Made

As a fee-only firm, we do not accept referral fees or any form of remuneration from other professionals when a referral is made by us.

Item 15 - Custody

Account Statements

Your account custodian provides monthly account statements. They either send them to your address-of-record or notify you that your statements are available for review on their password-protected website.

For your protection, we do urge you to periodically compare Front Street's reports and website to your custodian's statements. Any discrepancies should immediately be brought to our attention. You can expect a clear and concise explanation that satisfies you completely.

Item 16 - Investment Discretion

Discretionary Authority for Trading

We accept the discretionary authority to manage your accounts. To enable us to execute trades in your accounts, we ask you to grant us trading authority for your accounts through the signing of a *limited power of attorney form*, provided by a qualified custodian/brokerage firm.

In our view, discretionary trading authority helps to facilitate and promptly implement the investment policy that you have approved in writing by signing our *Wealth Management Agreement*.

Our clients approve the custodian to be used and the commission rates paid to that custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian on any trades.

Item 17 - Voting Client Securities

Proxy Votes

As it relates to proxy voting, given the size of our clients' collective holdings with these issuers, we feel we can exert minimal influence on management decisions and governance policies.

Therefore, when provided with proxies, *our default policy is to leave your shares unvoted*. This policy minimizes the amount of time spent (a) analyzing various shareholder proposals commonly seen on proxies, (b) voting your shares and (c) maintaining records of every vote we cast on behalf of you and all our other clients. On balance, it is our view the time spent on proxy voting activities does not sufficiently benefit you as a client.

For administrative reasons, however, most clients choose to have us receive all proxies and issuer-related communications that may require a voting decision or other corporate action. This decision can be reversed at any point in the future, at your discretion.

We do recognize that voting proxies may be viewed as a best practice of shareholders. If this is your view, we encourage you to have us direct your account custodian to send you all proxies and issuer-related communications.

Shareholder Class Action Lawsuits

We are not responsible for deciding if you should or should not participate in shareholder class action lawsuits. You are solely responsible for making that decision and for completing and submitting the required forms and any other documentation.

However, should you choose to participate in such a lawsuit, we do offer our help to facilitate the documentation process.

In addition, when advice is requested by you, we will provide it to you. Our advice and courtesy claims administration services will be based primarily on our internal analysis of your expected settlement amount.

Item 18 – Financial and Other Information

Financial Condition

We do not have any financial impairments that will preclude Front Street from meeting contractual commitments to you or to our other clients. Our firm's balance sheet is not required to be provided to you because we don't serve as a custodian for client funds or securities, and we do not require prepayment of fees of more than \$500 per client six months or more in advance.

Business Continuity & Succession Plan

Among other reasons, to help ensure continued and uninterrupted service to you, we have developed a *Business Continuity Plan & Succession Plan* that provides detailed steps to mitigate and recover from the loss of office space and/or communications as well as mitigate the effect of either the short-term incapacitation or untimely death of Jason Tank.

Our *Business Continuity Plan* covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, communications line outage, and internet outage. Electronic files are backed-up daily and utilize cloud-based storage services.

Alternate offices have been identified to support ongoing operations in the event our main office becomes unavailable. It is our intention to contact all clients within one day of a disaster that dictates moving our office to an alternate location.

Information Security Program

We do maintain information security procedures to reduce the risk that your personal and confidential information may be breached. We will share details at your request.

Privacy Policy and Notice

We strongly believe in ensuring the confidentiality and security of any personal information you entrust to us. The information that we collect in the normal course of our business includes physical and email addresses, Social Security and Tax ID numbers, and driver's license numbers. In addition, we clearly also obtain from you varying levels of your personal financial information. We do not, have not and will not sell your personal information.

All current and former clients' information is handled in a confidential manner and our employees will provide information to third parties only after you provide written permission to do so. This includes information that you want us to share with your other advisors, such as attorneys, accountants, or other investment professionals.

We do share your personal information with companies that you choose, with our recommendation or not, to perform custodial and trading services. We strongly suggest that you periodically change your passwords used for these custodian websites.

We maintain a secure office to ensure that our clients' information is not placed at unreasonable risk, including locked filing cabinets and password-protected computers.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to personal information, including our customer relationship management service provider. Federal and

state securities regulators may review our company records and personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to clients annually.

Item 19 - Requirements for State-Registered Advisers

Principals and Management Persons

Jason P. Tank, CFA, CFP®, EA, Principal and Managing Member

- Date of birth: June 7, 1972

Education Background:

- Michigan State University, BS in Mathematics, 1994
- Earned the Associate of Society of Actuaries (ASA) designation, 1999
- Earned the Chartered Financial Analyst (CFA) designation, 2000
- Earned the Certified Financial Planner (CFP) certificate, 2021
- Earned the Enrolled Agent (EA) designation, 2024

Business Experience:

- Prior to co-founding Front Street Wealth Management in 2003 Jason was an actuary with Allianz Life Insurance from 1994 until 1998 and ReliaStar Financial Corp from 1998 until 1999 and a portfolio manager for Financial & Investment Management Group, Ltd. from 1999 until 2003.

Other Business Activities: None

Additional Compensation: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Relationship or Arrangement with Any Issuer of Securities: None

Jason Tank's contact information: (231) 947-3775 or jason@frontstreet.com



Brochure Supplement

Part 2B of Form ADV as of March 27, 2024

Supervised Persons

Jason P. Tank, CFA, CFP[®], EA

This brochure provides information about the qualifications and business practices of Front Street Wealth Management. If you have any questions about the contents of this brochure, please contact us at (231) 947-3775 or info@frontstreet.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. The terms “registered investment adviser” or references to being “registered” does not imply a certain level of skill or training. Additional information about Front Street Wealth Management also is available on the SEC’s website at www.adviserinfo.sec.gov

Front Street Wealth Management

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Part 2B of Form ADV

Education and Business Standards

Front Street Wealth Management requires that its advisers earn a bachelor's degree and complete further coursework or accumulate extensive work experience that demonstrates knowledge in the field of investment management and/or financial planning. Examples of acceptable coursework or credentials include CFA, CFP®, EA or CPA.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

For more than 30 years, CERTIFIED FINANCIAL PLANNER™ certification has been the standard of excellence for financial planners. CFP® professionals have met extensive training and experience requirements and commit to CFP Board's ethical standards that require them to put their clients' interests first. That's why partnering with a CFP® professional gives consumers confidence today and a more secure tomorrow.

CFP® professionals take a holistic, personalized approach to bring all the pieces of your financial life together. As part of the CFP® certification, CFP® professionals also have made a commitment to CFP Board to act as a fiduciary when providing financial advice to a client. This means they have agreed to put your best interests first, so they can provide you confidence today and a secure tomorrow.

CFP Board's *Code of Ethics and Standards of Conduct* reflects the commitment that all CFP® professionals make to high standards of competency and ethics. CFP Board's *Code and Standards* benefits and protects the public, provides standards for delivering financial planning, and advances financial planning as a distinct and valuable profession. Compliance with the *Code and Standards* is a requirement of CFP® certification that is critical to the integrity of the CFP® marks. Violations of the *Code and Standards* may subject a CFP® professional to discipline.

To learn more about the CFP certificate, visit www.cfp.net

An ENROLLED AGENT (EA) is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights. This means they are unrestricted as to which taxpayers they can represent, what types of tax matters they can handle, and which IRS offices they can represent clients before. Learn more about enrolled agents in Treasury Department Circular 230.

To learn more about the EA designation, visit www.irs.gov/tax-professionals/enrolled-agents/enrolled-agent-information

Jason P. Tank, CFA, CFP®, EA, Principal and Managing Member

- Date of birth: June 7, 1972

Education Background:

- Michigan State University, BS in Mathematics, 1994
- Earned the Associate of Society of Actuaries (ASA), 1999
- Earned the Chartered Financial Analyst (CFA) designation, 2000
- Earned the Certified Financial Planner (CFP®) certificate, 2021
- Earned the Enrolled Agent (EA) designation, 2024

Business Experience:

- Prior to co-founding Front Street Wealth Management in 2003 Jason was an actuary with Allianz Life Insurance from 1994 until 1998 and ReliaStar Financial Corp from 1998 until 1999 and a portfolio manager for Financial & Investment Management Group, Ltd. from 1999 until 2003.

Other Business Activities: None

Additional Compensation: None

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

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