

## **Snowden Capital Advisors LLC**

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### **Form ADV Part 2B: Brochure Supplement for:**

R. Stephen Bartholow, Jr.

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West Lebanon, NH 03784

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October 22, 2024

The U.S. Securities and Exchange Commission (“SEC”) recently established a new requirement for Financial Advisors and certain other persons who provide investment advice or exercise investment discretion to provide a resume-like document (referred to as Form ADV Part 2B) to investment advisory clients. Form ADV Part 2B details the individual’s educational background, business experience, outside business activities, compensation, and disciplinary history, along with the name of the individual’s supervisor.

This brochure supplement Form ADV Part 2B provides information about Stephen Bartholow that supplements the Snowden Capital Advisors LLC (“Snowden”) brochure, available at <http://snowdenlane.com/adv/>. Please contact (646) 218-9760 and/or [compliance@snowdenlane.com](mailto:compliance@snowdenlane.com) if you have any questions about the contents of this supplement.

Additional information about registered individuals is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or on the BrokerCheck website at

<http://www.finra.org/Investors/ToolsCalculators/BrokerCheck>

In this brochure supplement, “Financial Advisor” means your Snowden financial advisor. The information in this brochure supplement is as of October 22, 2024, and is subject to change.

## **ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

This section provides information about your Financial Advisor's age, educational background and employment history. The business background information reflects the last five years as reported in the Financial Industry Regulatory Authority ("FINRA") Central Registration Depository ("CRD").

Year of Birth 1962

Senior Partner and Managing Director, Snowden Capital Advisors LLC, February 2023  
– present

Financial Advisor, Morgan Stanley, January 2010 – February 2023

Senior Managing Director, Carret Asset Management October 1997 – January 2010

## **ITEM 3 DISCIPLINARY INFORMATION**

This section includes details about certain legal and disciplinary events. Stephen Bartholow does not have any reportable disciplinary events or other legal events that require disclosure under Form ADV Part 2B.

The SEC requires registered investment advisers to disclose certain legal and disciplinary events about your Financial Advisor and other investment adviser employees. The disciplinary reporting requirements for broker-dealers and investment advisers differ significantly, with FINRA requiring broker-dealers to report on matters that are not required to be reported by registered investment advisers. As a result, this brochure supplement excludes matters that are not required to be reported by investment advisers, such as pending complaints and arbitrations, matters that are found or settled in our favor, certain settlements of arbitrations and complaints, as well as bankruptcies, judgments, liens, bonds, and investigations.

Above are certain material legal and disciplinary events about your Financial Advisor, if any, that are disclosed on the BrokerCheck system. If your Financial Advisor does not have any material legal or disciplinary disclosures under Form ADV requirements, we will indicate as such above.

Please note that if the person is not registered with FINRA, we have collected substantially similar information from the employee.

For more information on your Financial Advisor or any other registered firm employee, you can go to the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov/> or FINRA's BrokerCheck website at <http://www.finra.org/investors/ToolsCalculators/BrokerCheck/> and enter the applicable name into the investment adviser representative/broker search.

## **ITEM 4 OTHER BUSINESS ACTIVITIES**

This section describes investment-related or other reportable businesses or occupations in which your Financial Advisor is engaged in addition to his/her activities in providing investment advisory services, including potential conflicts of interest that arise as a result of these other activities.

### **Investment-Related Activities and Occupations**

Stephen Bartholow is a registered representative of Snowden Account Services, Inc. ("SAS"), which is registered as a broker-dealer with the SEC. Your Financial Advisor is registered with SAS to offer clients a broad range of products and services.

Your Financial Advisor may suggest or recommend that investment advisory clients use securities or other financial products, execution and custody services, or products or services of an affiliate. In addition, your Financial Advisor may suggest or recommend that advisory clients purchase or sell certain insurance products through advisory and non-advisory investment accounts. Snowden Financial Advisors are compensated based on, among other things:

- Commissions and other transaction-based compensation on the purchase or sale of certain securities.
- Investment advisory program asset-based fees and other fees associated with such programs.
- Distribution and service fees earned from the sale of mutual funds and other investment products.

Your Financial Advisor also may be compensated based on the sale of certain products and services offered through affiliates of Snowden. Consistent with firm policies, Financial Advisors may attend training events, due diligence meetings and other events provided and paid for by the sponsors of mutual funds and other investment products that the Financial Advisor may recommend to his/her clients. The receipt of this cash and non-cash compensation creates an incentive for Financial Advisors to recommend investment products based on the compensation received. We address these conflicts of interest by maintaining policies and procedures on the suitability and supervision of the advisory programs and services we offer you, and by disclosing our practices to ensure you make a fully informed decision.

Your Financial Advisor may act as a trustee, fiduciary or executor for certain family-related investment accounts and may earn commissions or other compensation on such accounts.

### **Other Business Activity**

Stephen Bartholow is currently engaged in reportable business activities outside of his/her employment with Snowden Capital Advisors LLC.

Name	Description	Investment Related	Compensation
Dogleg Right	Golf equipment manufacturing	No	No
Stony Brook School	Committee member	Yes	No

## **ITEM 5 ADDITIONAL COMPENSATION**

Investment advisers, such as Snowden, are required to act in the best interest of their clients, and our Financial Advisors are required to recommend only investment advisory programs, investment products and securities that are suitable for each client based upon the client’s investment objectives, risk tolerance and financial situation and needs. Certain of our compensation practices, however, may create actual or potential conflicts of interest that we would like to highlight. That said, these compensation practices are internal payments from Snowden to your Financial Advisor and do not result in additional charges to you.

Your Financial Advisor receives incentive compensation based on a percentage of the eligible revenue earned on the investment advisory and brokerage activities attributable to the accounts he/she services, as determined by Snowden.

The amount of compensation your Financial Advisor earns varies depending on the type of investment advisory program, service or product offered. These differences create a conflict of interest in that there is a potential financial incentive for your Financial Advisor to recommend or select certain investment advisory programs, services or products based on the nature of the compensation your Financial Advisor receives. However, as mentioned above, our Financial Advisors are required to recommend investment advisory programs, investment products and securities that are suitable for each client based upon the client’s investment objectives, risk tolerance and financial situation and needs.

Your Financial Advisor is also eligible to receive referral fees and share in revenue generated from the services provided to his/her clients by Snowden affiliated companies. This revenue is taken into consideration in determining the incentive compensation described above.

Your Financial Advisor has received recruiting and retention payments that subject him/her to certain ongoing responsibilities. These payments take the form of an upfront loan. As each repayment obligation arises, your Financial Advisor is eligible for a continuing service bonus contingent on your Financial Advisor’s continued employment and maintenance of a certain level of assets serviced by the Financial Advisor, and that continuing service bonus is used by the Financial Advisor to offset

the current repayment obligation each year. The amount paid to Financial Advisors under these arrangements generally is based to a large extent on the size of the business serviced by the Financial Advisor either at Snowden or at a prior firm. In addition, your Financial Advisor is eligible for future bonus payments based on the total assets in accounts that he/she services at Snowden and the revenue generated from those accounts at some defined point in the future. These bonuses are in addition to the incentive compensation to which your Financial Advisor is otherwise entitled as a Snowden Financial Advisor.

Your Financial Advisor is subject to policies that prohibit the acceptance of gifts and entertainment that may influence the nature of the investment advice provided to clients. Consistent with these policies, your Financial Advisor is permitted to receive gifts of up to \$100 per year and participate in ordinary and customary business entertainment.

## **ITEM 6 SUPERVISION**

Snowden Capital Advisors LLC supervises its Financial Advisors and monitors the advice they provide to clients and any trading discretion they exercise through regular reviews of client account activity and positions for adherence to client investment guidelines and the firm's internal policies and procedures. The firm utilizes general policies applicable to all investment advisory programs and, because of the different features and services of our programs, program-specific policies, and procedures.

The contact information for Stephen Bartholow's supervisor is provided below. Please contact the supervisor if you have any questions or concerns.

Greg Franks

Managing Partner and President

[gfranks@snowdenlane.com](mailto:gfranks@snowdenlane.com)

(646) 218-9765

## **ITEM 7 REQUIREMENTS FOR STATE-REGISTERED ADVISORS**

This section is required for advisers registered or registering with one or more state securities authorities. Stephen Bartholow has not been involved in any event of which this Item 7 requires disclosure.