

Form ADV

March 20, 2023

Part 2B Supplemental Brochure for...

David Gulacsy

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This brochure supplement (“Supplement”) has been prepared by Sandhill Wealth Management, Inc.. (“SWM”) and it provides information about the qualifications and background of the supervised person named above, hereinafter referred to as “Mr. Gulacsy.” You should review this Supplement in conjunction with Part 2A of our Form ADV, also known as our “Brochure.” You should have already received a copy of our brochure and if not or if you have questions about anything in this Supplement, please contact us at 404-984-5072 or david@sandhillwealth.com.

Additional information about David Gulacsy is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at www.adviserinfo.sec.gov.

The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

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II. Educational Background and Business Experience

Investment Advisor Representative	David Gulacsy,	
Year of Birth:	1970	
Formal Education After High School:		
Institution	Degree / Major	Years
The University of Florida	Bachelor of Arts / Political Science	1994 - 1998
Business Background for the previous 5 years:		
Entity	Title	Dates
Fortune Financial Services, Inc.	Representative	04/2018 - Present
Sandhill Wealth Management, Inc.	Chief Compliance Officer	12/2017 - Present
Platinum Wealth Partners, Inc.	Investment Advisor Representative	01/2017– 12/2017
Morgan Stanley	Financial Advisor	08/2009 – 12/2016

III. Disciplinary information

This portion of this Supplement is designed to provide you any pertinent information related to any disciplinary matters involving Mr. Gulacsy. We are obligated to look back for a period of ten years unless more than ten years have elapsed since a particular disciplinary event but that we deem the matter significant enough that a reasonable person would find it material in evaluating Mr. Gulacsy or our firm.

This information below is also available via the SEC's Investment Adviser Public Disclosure ("IAPD") which can be found at www.adviserinfo.sec.gov.

III. (A). Criminal or Civil Matters

Has Mr. Gulacsy been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Mr. Gulacsy...		
Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

III. (B). Administrative Proceedings

Has Mr. Gulacsy been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Gulacsy...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority...		
denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sandhilling or suspending the supervised person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting the supervised person's investment-related activities; or imposing a civil money penalty of more than \$2,500 on the supervised person?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

III. (C). Self-Regulatory Organization (“SRO”) Proceedings

Has Mr. Gulacsy been involved in a SRO proceeding in which Mr. Gulacsy...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO’s rules and was: (i) Sandhilled or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

III. (D).

Has Mr. Gulacsy been involved in any other proceeding in which a professional attainment, designation, or license of Mr. Gulacsy’s was revoked or suspended as a result of a violation of rules relating to professional conduct?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
In relation to the preceding item, did Mr. Gulacsy resign or otherwise relinquish a professional attainment, designation, or license in anticipation of such a proceeding?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

IV. Other Business Activity

IV.(A). Other Investment-Related Activities

Mr. Gulacsy is engaged in the following investment-related⁶ business activities outside the scope of his investment advisory activities on behalf of Sandhill. For any listed activity, we will name the other entity and we will also describe the relationship, if any, between our advisory business and each particular activity. We will also address any conflicts of interest that may arise in relation to such outside activity(s) as well as any particulars surrounding Mr. Gulacsy’s receipt of any compensation in connection with such activities.

Securities Brokerage Activities

Other entity: Fortune Financial Services, Inc

Relationship/Conflicts/Compensation: Mr. Gulacsy is licensed to sell certain securities and investment products through Fortune Financial Services, Inc. (“Fortune”), a FINRA member broker-dealer registered with the SEC. Mr. Gulacsy’s activities through Fortune are independent from and in addition to those of Sandhill. Sandhill and Fortune are not affiliated entities.

Mr. Gulacsy also receives additional compensation in relation to the sale of securities or other investment products. Such compensation is in the form of cash. The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of this other compensation gives Mr. Gulacsy an incentive to recommend investment products based on the compensation received, rather than on your specific needs. Although we are obligated to tell you this, both Mr. Gulacsy’s and our objective as a firm is to place nothing before your best interests.

Mr. Gulacsy, in his capacity as a registered representative of Fortune, may recommend Fortune’s brokerage services to clients who have or are utilizing Sandhill’s investment advisory services. Sandhill’s clients are free to implement advisory recommendations through any firm. There is no obligation to effect transactions through Fortune or Mr. Gulacsy, however, if you choose to do so, commissions may be earned by Mr. Gulacsy which may be higher or lower than those you might pay at another broker-dealer. Sandhill does not warrant or represent that commissions for transactions implemented through Fortune will be lower than commission available if you use another brokerage firm. Sandhill believes, however, that the overall level of services and support provided to clients by Fortune outweighs the potentially lower transaction cost available under other brokerage arrangements.

Sandhill may make conflicting or differing recommendations with respect to the same securities products to different advisory clients. All such recommendations are based on each individual client’s financial circumstances, needs, risk tolerances, objectives, etc.

How we address the Conflict(s): First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in Sandhill’s separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Written Supervisory Procedures (“WSPs”) that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set for on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our WSPs. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

The conflicts described in the preceding section are commonplace in the investment industry and we believe that they are not only appropriate but that they are proper in light of the added examination, licensing, registration, and other regulatory oversight that also takes place in the brokerage portions of the investment industry. Mr. Gulacsy has satisfied various regulatory examination and registration requirements that allow not only for the offering of brokerage products as well as the receipt of the normal and customary compensation that any similarly registered, licensed, and qualified person could receive in the form of sales compensation for those same products.

Bear in mind that even if Mr. Gulacsy was not registered/licensed to sell securities products, the majority of your investments or transactions involving such products would still result in you paying some sort of commission for those products. In Mr. Gulacsy’s case, his active registration/licensing allows him to be able to receive those commissions as opposed to the executing broker-dealer keeping them for themselves.

The added compensation received by Mr. Gulacsy in connection with any brokerage activities is deemed routine and customary compensation for such activities and is not believed to be inappropriate.

Insurance Activities

Other entity: None.

Relationship/Conflicts/Compensation:

Mr. Gulacsy is licensed to sell certain insurance products as an insurance agent. Mr. Gulacsy also may receive additional compensation in relation to the sale of insurance products. Such compensation is in the form of cash. The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of this other compensation gives Mr. Gulacsy an incentive to recommend insurance products based on the compensation received, rather than on your specific needs. Although we are obligated to tell you this, both Mr. Gulacsy's and our objective as a firm is to place nothing before your best interests.

Mr. Gulacsy, in his capacity as an insurance agent may recommend insurance services to clients who have or are utilizing Sandhill's investment advisory services. Sandhill's clients are free to implement advisory recommendations through any firm. There is no obligation to effect transactions through Mr. Gulacsy, however, if you choose to do so, commissions may be earned by Mr. Gulacsy which may be higher or lower than those you might pay at another insurance agency.

Sandhill does not warrant or represent that commissions for transactions implemented through Mr. Gulacsy will be lower than commission available if you use another insurance agency. Sandhill believes, however, that the overall level of services and support provided to Clients by Mr. Gulacsy outweighs the potentially lower transaction cost available under other insurance arrangements.

Sandhill may make conflicting or differing recommendations with respect to the same insurance products to different clients. All such recommendations are based on each individual client's financial circumstances, needs, risk tolerances, objectives, etc.

How we address the Conflict(s): First and foremost, we address the conflicts described in the preceding section by disclosing them to you in this Brochure Supplement as well as in Sandhill's separate Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory process, detailed in our Written Supervisory Procedures ("WSPs") that was designed to address, among other things, conflicts of interest such as this one. In addition, we have designated a Chief Compliance Officer, as set for on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our WSPs. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being adequately carried out and in a timely manner.

The conflicts described in the preceding section are commonplace in the investment industry and we believe that they are not only appropriate but that they are proper in light of the added examination, licensing, registration, and other regulatory oversight that also takes place in the brokerage portions of the investment industry. Mr. Gulacsy has satisfied various regulatory examination and registration requirements that allow not only for the offering of brokerage products as well as the receipt of the normal and customary compensation that any similarly registered, licensed, and qualified person could receive in the form of sales compensation for those same products.

Bear in mind that even if Mr. Gulacsy was not licensed to sell insurance products, the majority of your insurance or transactions involving such products would still result in you paying some sort of commission for those products. In Mr. Gulacsy's case, his active licensing allows him (and Sandhill) to be able to receive those commissions as opposed to the insurance company or some other agency keeping them for themselves.

The added compensation received by Mr. Gulacsy in connection with any insurance activities is deemed routine and

customary compensation for such activities and is not believed to be inappropriate.

IV.(B). Other Activities

Other than as described above in IV.(A), Mr. Gulacsy is not engaged in any activities outside the scope of his investment advisory activities on behalf of Sandhill.

V. Additional Compensation

The purpose of this Item is to describe any additional compensation (outside that which has been described above in Section IV.(A)) that Mr. Gulacsy may receive in addition to his normal compensation for the investment advisory services he/she performs under our firm.

Mr. Gulacsy does not receive any additional compensation.

VI. Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons.

Mr. Gulacsy serves the role of Designated Supervisor for SWM and in that capacity Mr. Gulacsy shall carry out the following general supervisory steps.

- Periodic review of customer account activity
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person's office location (if other than the our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of Written Supervisory Procedures ("WSP") that, among other things, address matters such as supervision of the activities of our supervised persons like Mr. Gulacsy. Our WSP manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

Mr. Gulacsy's contact information:

David Gulacsy
Chief Compliance Officer
407-984-5072

VII. Requirements for State-Registered Advisers

The information below will supplement the information previously provided in Item 3 of this Supplement.

VII.(A).(1) Arbitration(s)

Has Mr. Gulacsy been involved in an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following matters?		
A investment or an investment-related business or activity;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Fraud, false statement(s), or omissions;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Theft, embezzlement, or other wrongful taking of property;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Bribery, forgery, counterfeiting, or extortion; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Dishonest, unfair, or unethical practices.	<input type="checkbox"/> Yes	<input type="checkbox"/> No

VI.(A).(2). Civil, SRO or Administrative Proceedings

Has Mr. Gulacsy been involved in an award or otherwise been found liable in a civil, SRO or administrative proceeding involving any of the following matters?		
A investment or an investment-related business or activity;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Fraud, false statement(s), or omissions;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Theft, embezzlement, or other wrongful taking of property;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Bribery, forgery, counterfeiting, or extortion; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Dishonest, unfair, or unethical practices.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

VII.(B). Bankruptcy-Related Matters

Mr. Gulacsy has never been the subject of a bankruptcy petition.