



## **REAL WEALTH ADVISORS, LLC**

Real Wealth Advisors LLC  
300 North Executive Drive, Suite 125  
Brookfield, Wisconsin 53005  
Telephone: 414-808-2345  
E-mail: don@realwealthadvisors.com

[www.realwealthadvisors.com](http://www.realwealthadvisors.com)

Form ADV Part 2A - Disclosure Brochure

January 23, 2023

This brochure provides information about the qualifications and business practices of Real Wealth Advisors LLC. If you have any questions about the contents of this brochure, please contact us at [don@realwealthadvisors.com](mailto:don@realwealthadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Real Wealth Advisors LLC is also available on the Securities and Exchange Commission's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Real Wealth Advisors LLC is a registered investment adviser located in the state of Wisconsin. Registration as an investment adviser does not imply a certain level of skill or training.

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**Item 2:  
Material Changes**

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Real Wealth Advisors LLC ("RWA", "we", "us", or "our") is a newly organized investment adviser. This brochure is our initial Disclosure Brochure prepared according to regulatory requirements and rules. Therefore, we have not previously filed any annual updates to this brochure and have no material changes to report.

From time to time, RWA may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by securities regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or CRD# 318143. You may also request a copy of this Disclosure Brochure at any time by contacting RWA at 414-808-2345 or by email at [don@realwealthadvisors.com](mailto:don@realwealthadvisors.com).



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**Item 4:  
Advisory Business**

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Real Wealth Advisors LLC is a Wisconsin limited liability company, and an investment adviser located in the state of Wisconsin that was formed in November 2021. RWA is wholly-owned by Donald R. Mathias, CFP, its Chief Executive Officer and Chief Compliance Officer.

RWA provides financial planning services to a wide variety of clients, including individuals, trusts and estates. Our services include financial planning and project-based consultation.

RWA provides non-discretionary financial planning services per the client's need. A financial plan is designed to assist clients in their current financial statuses by outlining clear financial goals and investment observations. The plan is prepared for a client once a complete analysis and review of the client's assets and financial status is conducted. RWA's financial planning services may include any or all of the following based on each individual client's needs:

**Asset Organization.** Create single page map of all of the client's assets.

**Asset Accumulation Planning.** Analyze current savings and debt levels and review options to increase savings and reduce debt.

**Tax Efficiency Planning.** Review current and past tax returns and create strategies to manage current tax bracket along with mitigating overall tax burden.

**Investment Analysis.** Analyze current portfolio holdings to determine if investments and asset allocation are in line with the client's risk tolerance.

**Estate Planning & Coordination.** Review desired legacy goals and analyze current estate plan and beneficiary designations to determine if desired financial outcomes are properly coordinated and aligned with current tax regulations.

**Qualified Employee Plan Analysis.** Review current qualified plan and plan document to determine options and coordinate investment allocation to align with client's risk tolerance.

**Social Security Planning.** Analyze Social Security options and how best to coordinate the timing of when to elect Social Security and how it affects retirement, tax, and income goals.

**Pension Analysis.** Analyze pension options to determine break even dates and coordinate how pension income or lump sum amounts integrate into overall retirement income plans.



**Retirement Distribution Planning.** Create coordinated income plan in advance of retirement date to account for all sources of income and how much money will be withdrawn from each account, the amount of tax to be withheld for withdrawals, and into which bank accounts funds will be deposited.

**Stock Option Analysis.** Analyze current options and coordinate with the strategies of the client's accountant for tax mitigation upon exercising or selling vested shares.

**Life Insurance Planning.** Analyze current life insurance needs based on income replacement, legacy goals, charitable desires, or small business objectives.

**General Recommendations.** Provide general recommendations structured to identify risk and diversification levels.

RWA does not recommend specific investments as part of its financial planning services and does not execute trades for clients. As such, each client must make an independent determination as to whether to implement a financial plan prepared by RWA and make its own arrangements for execution of any desired investments through broker-dealers or other service providers other than those recommended by RWA. We typically recommend that clients use Securities America Advisors, Inc., an SEC-registered investment adviser ("SA Advisors") for investment advisory and asset management services, and Securities America, Inc. ("Securities America"), a broker-dealer and member FINRA/SIPC, for transaction execution, custody and other brokerage services. Our representatives may also be representatives of SA Advisors and Securities America. Clients should evaluate independently the investment advisory and brokerage services recommended by our representatives, including the reasonableness of any fees or commissions that our representatives may receive directly from SA Advisors or Securities America.

RWA and its representatives do not provide any legal or accounting advice nor prepare any legal or accounting documents.

RWA is a fee-only financial planning firm. It receives compensation only from its clients.

RWA does not manage or place client assets into a wrap fee program. Financial planning services are provided directly by RWA.

RWA is a newly established adviser. Assets under management will be reported with RWA's next filing of this Disclosure Brochure. Clients may request more current information at any time by contacting RWA.



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**Item 5:  
Fees and Compensation**

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Fees paid by clients to RWA are only for its financial planning and consulting services. RWA's fees do not include fees charged by third parties such as accountants or attorneys assisting a client with accounting or legal advice or fees and commissions charged by a client's broker-dealer and custodian. See Item 12, Brokerage Practices for additional information regarding RWA's practices with respect to broker-dealers and custodians.

Clients should also be aware that in addition to our advisory fees, some securities or other investment products, such as mutual funds or exchange traded funds (ETFs), may charge product fees that clients indirectly pay. RWA does not charge these fees to clients and does not benefit, directly or indirectly, from any such fees. Mutual funds and ETFs typically include embedded expenses that may reduce the mutual fund's or ETF's net asset value, and therefore directly affect the mutual fund's or ETF's performance and indirectly affect a client's portfolio performance.

RWA generally charges flat fees for its financial planning and consulting services based upon the value of assets subject to RWA's services using the following schedule:

<u>Value of Assets Subject to Services</u>	<u>Maximum Fee Range</u>
\$0 to \$100,000	Up to \$2,000
\$100,001 to \$250,000	\$2,000 to \$5,000
\$250,001 to \$500,000	\$5,000 to \$10,000
\$500,001 to \$750,000	\$10,000 to \$15,000
Over \$750,000	Up to 2% of Value of Assets

These flat fees are payable as assets are made subject to our services. For example, if a client opens an account with \$100,000 which becomes subject to our services, a fee would be due on that amount, and then if the client later added another \$150,000 which becomes subject to our services, an additional fee would be due on the additional \$150,000.

All fees are negotiable and each client's fee is set forth in the client's financial planning agreement with RWA. Fees are payable monthly based on the assets that become subject to our services during the prior month. Fees payable to RWA in some cases if the client chooses may be deducted from the client's account when due. The client will receive an invoice from RWA as well as reports from the account's custodian showing the fee calculation and debit. Authorization for the deduction of fees this way is contained in the financial planning agreement.



We may modify our payment terms prospectively on at least 30 days prior written notice. If such amendment is not acceptable to a client, the client may terminate its the financial planning agreement with RWA at any time.

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

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RWA does not charge performance-based fees for its financial planning services. The fees charged by RWA are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any client.

RWA does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or ETF) and has no financial incentive to recommend any particular investment options to its clients.

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**Item 7:**  
**Types of Clients**

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RWA generally provides and may provide advisory and financial management services to a wide variety of clients including:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit-sharing plans
- Trusts and estates
- Corporations and other entities not listed above

RWA does not require a minimum account size but does reserve the right to refuse or terminate an account at its discretion.

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

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RWA will analyze securities using the following methods:

- **Fundamental analysis:** Evaluating financial performance of securities, including historical, current and projected performance. But fundamental analysis does not attempt to anticipate market movements due to the inherent risk of the price of securities.
- **Technical Analysis:** Analyzing past market movements and, when applicable, apply that analysis to present strategy. This is done in order to utilize the recurring patterns of investor behavior and potentially predict future price movement.



- **Cyclical Analysis:** Taking account of the market trends and timing in order to determine a price cycle of the securities and identify the stage of a security within that cycle.

### Risk of Loss

Investing in securities involves a risk of loss. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. RWA will assist clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a client will meet their investment goals and RWA does not offer any strategies or services that guarantee rates of return on investments for any time period to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices, or investment products.

Each client's engagement will entail a review of the client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for the client. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a client's individual circumstances. We will rely on the financial and other information provided by the client or the client's designees without the duty or obligation to validate the accuracy and completeness of the information provided. It is the responsibility of the client to inform RWA of any changes in financial condition, goals or other factors that may affect this analysis.

Potential clients should consider the following risks before engaging RWA:

**General Market and Economic Risk:** The value of a client's investments may decline due to changes in general economic and market conditions. This includes developments affecting markets in general, such as political, regulatory, market or economic developments, or other developments that impact specific economic sectors, industries and segments of the market.

Further increasing market and economic risks is the impact of the pandemic from the global outbreak of COVID-19. This pandemic drove mandatory business closures, layoffs, quarantines, restrictions on public gatherings and travel. It has disrupted the global economy and markets and could adversely affect investments in the future. Uncertainties regarding the recovery of all impacted aspects could lead to additional market volatility which could negatively affect security prices.

**Investment Selection Risk:** The performance of a client's portfolio may depend on appropriately selecting investments and anticipating future price movements, economic and market conditions, and/or the value of equity securities, and/or other investments. The value of investments held by a client may be adversely impacted by developments affecting the specific issuer of the security, even if the overall industry or economy is unaffected. These developments may include a variety of factors, such as





management issues, political or regulatory factors, a decline in revenues or profitability, losses of key suppliers, customers or material contracts, a failure to meet expectations for earnings or other financial or business metrics, litigation, bankruptcy, an increase in operating or other costs, defaults under credit arrangements or material contracts, weak demand for the issuer's products or services, or other events that adversely impact the issuer's competitive position.

**Common Stock Risk:** Common stocks are susceptible to market fluctuations and to volatile increases and decreases in value as investors' confidence in and perceptions of issuers change. Investments in common stocks are subject to the risk that in the event of a company's liquidation, the holders of the preferred stock and creditors will be paid in full before any payments are made to holders of common stock.

**Growth Style Risk:** The prices of growth stocks may be more sensitive to changes in current or expected earnings than the prices of other stocks.

**Value Style Risk:** Value stocks may perform differently from the market as a whole and may never reach their full market values.

**Exchange Traded Funds Risk:** To the extent a client invests in ETFs, in addition to risks applicable to other equity securities, the client will be subject to the risk that the ETFs may trade at prices below their net asset value and that an active market for an ETF's shares may not develop. ETFs have their own management fees and expenses, which may be duplicative, and we have no control over the ETF's investment strategies or objectives. Leveraged and inverse ETFs typically make extensive use of derivatives, are subject to additional risks and may be considered speculative.

**Small-Cap Risk:** Investing in securities of small-cap companies generally involves a higher degree of risk than investing in securities of larger companies. The price of securities of smaller companies are generally more volatile than those of larger companies, and they generally will have less market liquidity.

**Fixed Income Risks:** Investing in bonds and other fixed income securities are subject to certain risks, including but not limited to, interest rate risk, credit risk, prepayment risk and market risk, which could reduce the yield that an investor receives.

**High-Yield Bond Risk:** Investments in high-yielding, non-investment grade bonds involve higher risk than investment grade bonds. Adverse conditions may affect the issuer's ability to make timely interest and principal payments on these securities.

**Security Selection and Asset Allocation Risk:** Securities selected from a particular asset class (*e.g.*, stocks, bonds, money market instruments) may experience unusual market volatility or may not perform as expected. An asset allocation program does not guarantee achievement of a client's investment objective nor protect against loss.



**Options and Futures Risk:** The writing and purchasing of options is a highly specialized activity that involves investment techniques and risks different from those associated with ordinary portfolio securities transactions. Imperfect correlation between the options and securities markets may detract from the effectiveness of the option transaction.

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**Item 9:  
Disciplinary Information**

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RWA is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of RWA's advisory business or the integrity of its management. RWA does not have any such disciplinary information to report.

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**Item 10:  
Other Financial Industry Activities and Affiliations**

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RWA is not engaged in any other financial industry activities, nor does it have any affiliations that are material to its advisory services. Representatives of RWA may also be representatives for SA Advisors and Securities America. We anticipate that a significant percentage of our representative's time will be spent providing services for SA Advisors and Securities America.

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

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We have adopted a Code of Ethics for all supervised persons of the firm describing our high standard of business conduct and fiduciary duties to its clients. The Code of Ethics includes written policies and procedures governing the conduct of the firm's supervised persons, including, but not limited to, provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at RWA must acknowledge the terms of the Code of Ethics annually, or as amended. Upon request, RWA will provide a copy of the Code of Ethics to clients and prospective clients. To request a copy of the Code of Ethics, please contact RWA at [don@realwealthadvisors.com](mailto:don@realwealthadvisors.com).

Neither RWA nor any of its employees recommends to clients, or buys or sells for client accounts, securities in which RWA has a direct material financial interest.

For our nondiscretionary service, we do not have investment authority, discretionary or otherwise, to purchase any securities on behalf of clients. Once a recommendation has been generated by us, it is in the discretion of the client whether to enter into a



transaction based on any such recommendation, when to enter into any such transaction and which broker to use for the execution thereof. However, our officers and employees could conceivably purchase securities for their own accounts that may, in certain instances, be the same securities as those recommended for clients, including shares in the same ETF. The securities that are recommended to clients are highly personalized and are based on each client's profile. Any such purchase of the same securities would be coincidental.

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### **Item 12: Brokerage Practices**

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While RWA does not exercise discretion over the selection of a broker-dealer, it may recommend a broker-dealer to clients for custody and execution services. Clients are not obligated to use the broker-dealer recommended by RWA and will not incur any extra fee or cost associated with using a broker-dealer not recommended by RWA. However, RWA may be limited in the services it can provide if the recommended broker-dealer is not engaged.

RWA will generally recommend that clients establish their accounts at Securities America, a FINRA-registered broker-dealer and member of SIPC. While RWA does not maintain a direct relationship with SA Advisors and Securities America, our representatives may also be representatives of SA Advisors and Securities America and receive fees and commissions directly from SA Advisors and Securities America. RWA may recommend that its clients use Securities America in order to maintain custody of clients' assets, but such designation is optional as RWA does not have discretionary authority to select the broker-dealer or custodian for custody and execution services.

Following are additional details regarding the brokerage practices of RWA:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an adviser enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. RWA does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian.
2. Brokerage Referrals - RWA does not receive any compensation from any third party in connection with the recommendation for establishing an account.
3. Directed Brokerage - RWA does not direct brokerage for its clients and does not have discretion to place trades for its clients. RWA will not engage in any principal transactions (i.e., trade of any security from or to the adviser's own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client account).



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**Item 13:  
Review of Accounts**

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The financial and investment recommendations provided to clients by RWA will be reviewed as frequently as agreed in advance by RWA and the client.

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**Item 14:  
Client Referrals and Other Compensation**

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RWA does not currently have any client referral relationships. Thus, it does not pay any fee to a third party for making client referrals to it. Also, as indicated above, the firm does not direct brokerage transactions to any third party, including Securities America, in return for client referrals.

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**Item 15:  
Custody**

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RWA does not have custody of the funds and securities in client accounts. Clients may receive periodic statements from the custodian that holds and maintains the client's investment assets. RWA urges each client to carefully review such statements.

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**Item 16:  
Investment Discretion**

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RWA only offers non-discretionary advisory services, and as a result does not have discretionary authority to manage securities on behalf of any clients.

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**Item 17:  
Voting Client Securities**

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RWA does not vote proxies on behalf of clients who will receive such notices from their account's custodian. Furthermore, RWA does not take any action on legal notices it or a client may receive from issuers of securities held by a client.

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**Item 18:  
Financial Information**

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RWA does not require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance, and thus no financial information is required to be provided by RWA.



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**Item 19:**  
**Requirements For State-Registered Advisers**

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**Background Information.** See the attached Schedule 2.B brochure for background information about RWA's sole executive officer. RWA does not have any other management personnel.

**Other Business.** RWA is not engaged in any business not described in this Disclosure Brochure.

**Legal Events.** Neither RWA nor any of its management persons have been involved with any arbitration claim of any kind or any self-regulatory organization or administrative proceeding of any kind.

**Relationships.** Neither RWA nor any of its management personnel have a relationship with an issuer of securities.



## Form ADV Schedule 2B: Brochure Supplement



### **REAL WEALTH ADVISORS, LLC**

Real Wealth Advisors LLC  
300 North Executive Drive, Suite 125  
Brookfield, Wisconsin 53005  
E-mail: [don@realwealthadvisors.com](mailto:don@realwealthadvisors.com)

This Brochure Supplement provides information about the investment adviser representatives of Real Wealth Advisors LLC ("RWA") and supplements the RWA Disclosure Brochure. You should have received a copy of that brochure. Please contact us at [don@realwealthadvisors.com](mailto:don@realwealthadvisors.com) if you did not receive RWA's Disclosure Brochure or if you have any questions about the contents of this supplement

Additional information about investment adviser representatives of RWA is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Donald R. Mathias, CFP  
CRD No. 5756340

January 23, 2023

***Item 2 | Educational Background and Business Experience***

Donald Mathias was born in 1981. He attended Cedarville University in Ohio, where he received a bachelor's degree in Liberal Arts with an emphasis on Christian Education in 2006. Mr. Mathias has been working in the securities industry for several years, and has gone on to earn his designation as a Certified Financial Planner (CFP) in 2012.

Mr. Mathias is currently the founder and an Investment Advisor for RWA. From March 2015 to December 2021, he was an Investment Advisor for Alliance Wealth Management Milwaukee, Inc. In addition, from March 2015 to December 2021, Mr. Mathias was also a Registered Representative for Raymond James Financial Services, Inc. and an investment adviser representative for Raymond James Financial Services Advisors, Inc. Prior to that, from May 2011 through February 2015 he was a Registered Representative and Investment Adviser for JW Cole Advisors.

He is also currently a Registered Representative for Securities America, Inc. and an investment adviser representative for Securities America Advisors, Inc.

***Item 3 | Disciplinary Information***

Mr. Mathias does not have any legal or disciplinary events that would be material in your evaluation. He has not been party to: (a) a criminal or civil action in a domestic, foreign or military court, (b) an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) a self-regulatory organization proceeding.

***Item 4 | Other Business Activities***

In addition to offering investment advisory services as an Investment Advisor Representative, he is also a registered representative for Securities America, Inc., and investment adviser representative for Securities America Advisors, Inc. and licensed to sell insurance products through various insurance companies.

***Item 5 | Additional Compensation***

He may receive commissions for the sale of insurance and securities products, as well as advisory service fees. He does not receive any additional economic benefit from third parties for providing advisory services other than noted above.



*Item 6 / Supervision*

He is the Chief Compliance Officer for RWA, and is responsible for his own supervision as well as that of all investment adviser representatives of RWA. Mr. Mathias may be reached at 300 North Executive Drive, Suite 125, Brookfield, Wisconsin 53005 or at 414-808-2345.

*Item 7 / Requirements for State Registered Advisors*

Mr. Mathias has not been involved in: (a) any arbitration claim alleging damages in excess of \$2,500 resulting in an award or being found liable; (b) any civil, self-regulatory organization, or administrative proceeding resulting in an award or otherwise being found liable; or (c) any bankruptcy petition.

