



Part 2A of Form ADV: Firm Brochure

**FORM ADV PART 2 UNIFORM**

**APPLICATION FOR INVESTMENT ADVISOR**

**REGISTRATION FOR**

**WHITE LIGHTHOUSE INVESTMENT MANAGEMENT SARL**

Rue du Grand-Chêne 8  
1003 Lausanne, Switzerland

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This brochure provides information about the qualifications and business practices of White Lighthouse Investment Management SARL. If you have any questions about the contents of this brochure, please contact us at the above phone number. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about White Lighthouse Investment Management SARL is also available on the SEC's website at <https://adviserinfo.sec.gov/> and at the White Lighthouse website at [white-lighthouse.ch](http://white-lighthouse.ch).

By the fact that White Lighthouse Investment Management SARL is a Registered Investment Advisor does not in itself imply a certain level of skill or training.

There are no material changes since the last annual update of this brochure in 2023.

## **Table of Contents**

Page 3. Advisory Business (Assets under Management)

Page 3. Fees and Compensation

Page 5. Performance Based Fees and Side-By-Side Management

Page 5. Types of Clients

Page 5. Methods of Analysis, Investment Strategies and Risk of Loss

Page 6. Disciplinary Information

Page 6. Other Financial Industry Activities and Affiliations

Page 7. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Page 8. Brokerage Practices

Page 8. Review of Accounts

Page 9. Client Referrals and Other Compensation

Page 9. Custody

Page 9. Investment Discretion

Page 10. Voting Client Securities

Page 10. Financial Information

### **Advisory Business (Assets Under Management)**

As of December 31, 2023, the firm had approximately \$80,169,000 of discretionary assets under management calculated in the manner that the SEC recommends. Jonathan Lachowitz is the Owner and Managing Director of White Lighthouse Investment Management SARL. The firm provides investment management services for clients.

### **Investment Management Services**

For investment management clients, the firm conducts a discovery process to understand the clients' income and net worth, their goals, risk tolerance and other factors that inform the investment policy that guides the design and management of clients' portfolios. We create diversified portfolios with a custom designed asset allocation mostly composed of low-to-moderate cost, high quality, liquid investments, mostly in the form of Exchange Traded Funds from companies like Vanguard, BlackRock (iShares) and others, though we may use or retain individual securities and mutual funds.

### **Fees and Compensation**

We offer two engagement options, an investment management-based engagement option and an hourly or project-based financial planning engagement.

### **Investment Management Based Engagement**

Clients pay both a fixed fee and a variable Assets Under Management (AUM) fee, paid quarterly in arrears, with 5,000 CHF annual minimum that covers investment management services. Fees are calculated based on assets under management per the following schedule:

	<b><u>Assets under Management</u></b>	<b><u>%</u></b>
	0 CHF – 500,000 CHF	Included in annual fee
on the next	500,001 CHF to 2,000,000 CHF	1.0%
on the next	2,000,001 CHF to 5,000,000 CHF	0.8%
on the next	5,000,001 CHF and above	negotiable

In addition to our fees, fees are charged by the custodian bank for securities trades. The custodian may also charge fees for custody of assets, cash transfers, foreign exchange, stamp

tax, tax reports, holding of physical assets, administration, etc. A typical charge by a Swiss custodian can range from 25 CHF to over 1000 CHF per trade. We strongly encourage clients to use a low-cost bank. In all cases White Lighthouse Investment Management SARL never receives payment back from the bank or any investment funds for trading or other fees (these are known as retrocessions in trading that varies among funds); we do not receive any commissions from trading or holding mutual funds for clients. There is also a fee in most mutual funds and exchange traded funds ranging from less than .1% to over 2% during the year for fund expenses (managers, advertising, report generation, etc.). As a fee-only firm we are only compensated by our clients. Our investment management fees are deducted quarterly in arrears (at the end of the quarter), directly from client accounts.

As additional safeguards to our clients, we send all invoiced amounts to the custodian, electronically before they are posted to the client accounts. The custodian also provides monthly reports and online real-time access to account activity. The client may also call or write to the custodian at any time to terminate our ability to trade in and deduct fees from their accounts. Clients must authorize the custodian to allow us to deduct their management fees. Please note above that brokerage transactions may include fees other than those charged directly by White Lighthouse Investment Management SARL.

### **Hourly or Project-Based Financial Planning Consultations**

Clients may engage us on an hourly or a project-based fixed fee basis, agreed upon in advance and dependent upon the scope and complexity of the project. The minimum fee for this type of engagement depends on the advisor, but it is generally 1,000 CHF or higher. A non-refundable 50% deposit may be required at the time of the agreement, and the balance is due upon delivery of the project-based services. We do not provide investment advice or management to clients on a project-basis. Our only investment services are discretionary investment management for professional clients.

For all engagement types, fee minimums and deposit requirements may be higher, reduced, or waived at the discretion of the individual advisor or the firm.

### **Performance Based Fees and Side-by-Side Management**

We currently do not charge any performance-based fees. Side-by-side management is when one manages accounts in which some are charged by assets under management, and some are charged by performance. Since we do not charge by performance, we therefore do not tend to favor one account charged one way over another.

### **Types of Clients**

Our clients include individuals, families, and, in some cases, their adult children. We work with several high-net-worth individuals. Most of our clients are international individuals or families.

Our current minimum account size for new clients is 500,000 CHF though, at our discretion, we may accept clients below this minimum as long as they can be classified as professional clients in Switzerland.

### **Methods of Analysis, Investment Strategies and Risk of Loss**

We manage each client's portfolio(s) based on their individual circumstances. This generally includes our analysis and understanding of their risk profile (risk tolerance, capacity and need), their risk profile, their age, their income needs from the portfolio, their time horizon, and a number of other factors that pertain specifically to each client. Asset allocation over several investment classes is done in order to build well-diversified portfolios. Based on macro-economic factors and our own analysis we may decide to include or exclude specific investment classes or under- or over-weigh specific sectors.

It should be noted that investing in securities involves the potential loss of invested capital and clients should be prepared to bear this loss. We try to tailor the account based on a client's risk profile and cash flow needs in order to keep losses in line with risk tolerance.

All investments and investment strategies contain risk of loss. Based on our understanding of our clients' risk profiles we endeavor to create well-diversified portfolios using primarily index ETFs, and we may use some other individual securities that are highly liquid. Historically, well-diversified portfolios using the concepts of modern portfolio theory have produced lower volatility

returns for a given level of risk, though past performance may not be indicative of future performance.

We encourage clients to take a long-term investment horizon since equity and fixed income investments are known historically to be prone to volatility, which can at times be extreme. We also request clients to let us know of any changes in their circumstances and any cash needs, so we can plan accordingly.

Other risks that client portfolios are subject to are inflation, regulatory, systemic, currency changes, interest rates, and the overall macro-economic environment in Europe, the United States, and globally. Every investment strategy has risk of loss and our client portfolios, and our strategy may result in clients losing money.

### **Disciplinary Information**

There have been no disciplinary events against White Lighthouse Investment Management SARL or any of its advisory personnel in any jurisdiction.

### **Other Financial Industry Activities and Affiliations**

In addition to White Lighthouse Investment Management SARL, Jonathan also owns and works in the related firm White Lighthouse Investment Management Inc. which is registered with the SEC.

Jonathan Lachowitz was formerly [2011 – 2016] on the board and is currently a member of the SFPO (Swiss Financial Planning Organization). SFPO is authorized by the FPSB (Financial Planning Standards Board) in Washington, DC to grant the CFP® marks in Switzerland. Jonathan resigned from the board voluntarily due to time constraints and remains a member of SFPO in good standing.

White Lighthouse Investment Management SARL is licensed as a portfolio manager by FINMA, a Swiss regulatory regime and is registered with the SEC. Business is conducted from an office in Lausanne, Switzerland. Jonathan Lachowitz is the sole owner of White Lighthouse Investment Management SARL.

In 2014, Jonathan Lachowitz joined the Advisory Board of OnShore Wealth S.A., a Swiss registered independent asset management firm. In January 2019, OnShore Wealth S.A. was renamed OnSa Advisors SA. Jonathan receives no compensation for this role.

From 2014 – 2016, Jonathan wrote numerous personal financial articles for The Wall Street Journal and in 2019 and 2020 started writing for Bloomberg, both on an unpaid basis.

Jonathan occasionally taught at IMD Business School in Lausanne and for ESCP, a French Business School with several campuses in Europe. The material presented is generally of a financial planning nature.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

We have never participated or had an interest in trades to or from a client account or between existing client accounts. Trades are made on the open markets. While we do personal trading, our portfolios consist primarily of mutual funds, ETFs and large capitalization stocks (e.g. Amazon, Johnson & Johnson, Microsoft, etc.). Our personal trades, other than mutual funds, are documented and reviewed periodically.

We may buy or sell the same securities as those owned by our clients. These are generally widely held stocks, mutual funds, or ETFs and based on the size of the trades in both client and our personal accounts, we don't believe we can have any influence over pricing and the markets.

White Lighthouse Investment Management SARL has its own written code of ethics which includes the complete CFP® Board's Code of Ethics and Standards of Conduct. A copy of this is available upon request by any client or prospective client.

Investing in the same securities as clients' accounts is a potential conflict of interest but we feel that since we generally invest in either high capitalization securities, mutual funds or ETFs the conflict is minimal at most.

### **Brokerage Practices**

While we may try to work with any bank or broker that a client either already has an account with or wishes to establish an account with, many Swiss banks refuse to work with independent investment managers who don't bring a minimum amount of assets to the bank. Many Swiss banks have also chosen not to work with managers or clients who have US citizenship. Additionally, many banks, including in Switzerland, engage in excessive pricing or discriminatory practices with respect to the national origin of the potential client. Banks often pay a percentage of their bank fees back to the investment manager, a practice that White Lighthouse Investment Management SARL does not engage in. Based on these complications, we work together with the clients to try and find a bank or brokerage firm that will accept the client. White Lighthouse Investment Management SARL as an independent investment manager, provides transparent pricing and online access to both the clients and the manager. We do not receive any products or services from any banks or brokerage firms that would not fall under the safe-harbor rules. The banks do provide some minimal research that we can access, such as performance statistics on investment funds.

### **Review of Accounts**

All client accounts are reviewed by Jonathan Lachowitz and/or another Investment Manager at White Lighthouse Investment Management SARL on a continuous basis and specifically based on market conditions or significant changes in a client profile or large cash deposits or withdrawals.

Client reports are available to each client through the client's secure portal on a quarterly basis and include account holdings, performance reports, and a billing statement. Reports consist of an account summary showing beginning and end values, and interest and dividends received. Performance review showing relationship-to-date, 5-year, 3-year, 1-year, and quarter performance with Return on Investment information.

Portfolio statements show in graph format the classes of assets held, followed by a specific breakdown of securities held, including cost basis and current market value. A report showing the



management fees broken down by the client's individual accounts and a total is included, followed by a comprehensive performance report for each security held in the client accounts.

### **Client Referrals and Other Compensation**

We gladly accept client referrals from existing clients and other professionals. White Lighthouse Investment Management SARL currently, in 2024, does not pay for any referrals.

We have the potential to pay for referrals on a limited basis to OnSa Advisor S.A. in Switzerland who have the capacity to act as a solicitor for White Lighthouse Investment Management SARL. This would generally be for high-net-worth clients with complex international situations where White Lighthouse will serve as the Investment Manager.

We do not get compensated by any institution or individual for any client's referrals we may make to them.

### **Custody**

White Lighthouse Investment Management SARL, upon the written authorization of each client, can and does request its management fees from the bank where the client accounts are held in custody. This power to request fees is considered limited custody and does not, according to the SEC, require an annual audit.

Clients receive statements from us on a quarterly basis and from the custodian either monthly or quarterly. It is recommended that clients review and compare these reports and notify us of any discrepancies. All clients also can access their accounts, statements, and transactions at any time online at the custodian's website.

### **Investment Discretion**

The firm has investment discretion for all the accounts that we manage, with a limited power of attorney to buy and sell on the client's behalf, in accounts titled in the name of the clients or for their benefit. Investment management fees are a percentage of assets under management and/or a fixed annual fee and can include ancillary financial planning advice generally related to the financial and investment goals of the client and their families.

Financial planning advisory takes place on an hourly basis where we are not responsible for managing the clients' accounts, or before clients decide to have us manage their investments. Generally, clients' questions and needs are identified first, a firm range of time and cost to deliver services is given, and then financial planning analysis is performed and delivered.

Analysis consists generally of investment/asset allocation across several different investment classes based on the client's risk tolerance, which is formulated based on client interviews, goals and objectives, and a risk profiling questionnaire.

Decision makers in investment allocation at White Lighthouse Investment Management SARL must have a CFP® qualification or comparable experience and licensing to make investment trades for clients.

### **Voting Client Securities**

We do not vote client securities.

### **Financial Information**

Since we do not have the ability to withdraw client assets, our financial situation would not have any impact on our clients' contractual obligations. While we do have discretionary authority over our clients' accounts, there are no incidences in which our financial condition would impact their trading activities. Therefore, we do not believe it is necessary for us to report on any of our financial information.

We do not require or solicit prepayments of more than 500 CHF for investment management services. We may require a non-refundable fee in advance for financial planning projects.