

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



**Form ADV Part 2A Brochure
Updated March 21, 2024**

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This Brochure provides information about the qualifications and business practices of Pope Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (941) 800-5955 and/or email at bpope@mulliganfg.com. Currently, our Brochure may be requested free of charge by contacting Brian Pope, President at (941) 800-5955 or bpope@mulliganfp.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.

Pope Wealth Management is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Pope Wealth Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Effective March 21, 2024, the firm has rebranded from “Mulligan Financial Group” to “Pope Wealth Management”. All other tenants and principles of the firm remain in place as this is a general rebranding.

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Item 4 Advisory Business

A. Description of Advisory Firm

Pope Financial Planning, LLC is a limited liability corporation organized in the State of Florida on October 5, 2011 under document number L11000090378.

Pope Wealth Management is a Fictitious Name registered in the State of Florida on March 15, 2024 (Registration #G24000038198). Pope Financial Planning, LLC is the owner of the Fictitious Name.

B. Pope Wealth Management (hereinafter “PWM”) offers the following services to advisory clients:

Investment Supervisory Services

PWM offers ongoing portfolio management services based on individual goals, objectives, time horizon, and risk tolerance of each client. PWM creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

PWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Most accounts serviced directly or indirectly by PWM are discretionary in nature; however, PWM does accept non-discretionary accounts on a case by case basis. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Services Limited to Specific Types of Investments

PWM generally limits its money management to mutual funds, exchange traded funds, equities, bonds and fixed income. PWM may use other securities as well to help diversify a portfolio when applicable.

Client Tailored Services and Client Imposed Restrictions

PWM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values and beliefs. However, if the restrictions prevent PWM from properly servicing the client account, or if the restrictions would require DKE to deviate from its standard suite of services, PWM reserves the right to end the relationship.

Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses and other administrative fees. PWM does not participate in any wrap fee program.

The fee schedule applicable as of this Brochure is as follows:

Value of Managed Account with Firm	Per Month	Annualized
First \$500,000	0.0833%	1.00%
Next \$500,000 (\$500K – 999K)	0.070%	0.85%
Next \$500,000 (\$1MM – \$1.499MM)	0.0625%	0.75%
Next \$500,000 (\$1.51MM - \$1.99MM)	0.0542%	0.65%
\$2 million and over	0.0375%	0.45%

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in advance, and clients may terminate their contracts within thirty days' written notice.

Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the quarter terminated. The fee refunded will be the balance of fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their contacts without penalty, for full refund, with 5 business days of signing the advisory contract.

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Clients may also opt to pay fees by check if desired. PWM will prepare an invoice to clients who wish to pay fees via check.

Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance. Advisory fees may also be invoiced and billed directly to the client quarterly in advance. Clients may select the method in which they are billed.

Clients are Responsible For Third Party Fees

Clients are responsible for payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc). Those fees are separate and distinct from the fees and expenses charged by PWM. Please see Item 12 of this brochure regarding broker / custodian.

Education Seminars / Workshop Services

PWM leads educational seminars and classes at the Lakewood Ranch campus of the State College of Florida. PWM is not compensated by the State College of Florida for leading / instruction of these classes. PWM is not affiliated with the State College of Florida. The State College of Florida receives a registration fee of \$49 per household directly from the student. PWM does not receive any compensation for any educational seminars or workshops.

Item 6 *Performance-Based Fees and Side-By-Side Management*

PWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Fees are collected as stated in Item 5 Fees and Compensation.

Insurance transactions, such as annuities and life insurance, are paid commission to PWM. While we have these available in our brochure of services, in general, we do not recommend these products unless due to a specific client reason.

Item 7 Types of *Clients*

PWM provides financial planning, coaching and investment advice to Family Offices, Individuals, Married Couples, and Divorcees. PWM generally requires a minimum account of \$500,000 to qualify to for portfolio management. PWM reserves the right to make exceptions to this minimum portfolio amount.

Clients who are solely seeking divorce financial analysis and / or financial coaching will be charged a flat fee disclosed in Item 5 Fees and Compensation. There is no minimum asset requirement or investment advice / recommendations provided for this service.

Methods of Analysis and Investment Strategies

Methods of Analysis

PWM's methods of analysis include fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages

PWM's mutual fund (or ETF) and diversified portfolio investment philosophy is grounded in Modern Portfolio Theory and the Efficient Markets Hypothesis. We do not employ security specific or macro-economic research or data in designing our mutual fund investment strategies.

Investment Strategies

PWM uses long term trading, short term trading and margin transactions.

Investing in securities involves a risk of loss that you, as a client, should prepare to bear.

Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading and margin transactions generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies. PWM discourages clients from margin transactions.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized

PWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the greater domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carry the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” in nature (lower risk) or stock “equity” nature (mentioned above).

Equity investments generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected / Inflation Linked Bonds: The risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Bonds carry risk of principal loss due to market conditions prior to maturity. The risk of loss holding to maturity is minimal but the market risk during the life of the bond may be substantial and is dependent on market interest rate levels.

Fixed Income is an investment that guarantees fixed periodic payments in the future that involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Stocks and Exchange Traded Funds (ETF): Investing in stocks and ETF’s carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Precious Metal ETFs (Gold, Silver, Palladium Bullion backed “electronic shares” not physical metal). Investing in precious metal ETFs carries the risk of capital loss.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political / regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Criminal or Civil Actions

There are no criminal or civil actions to report.

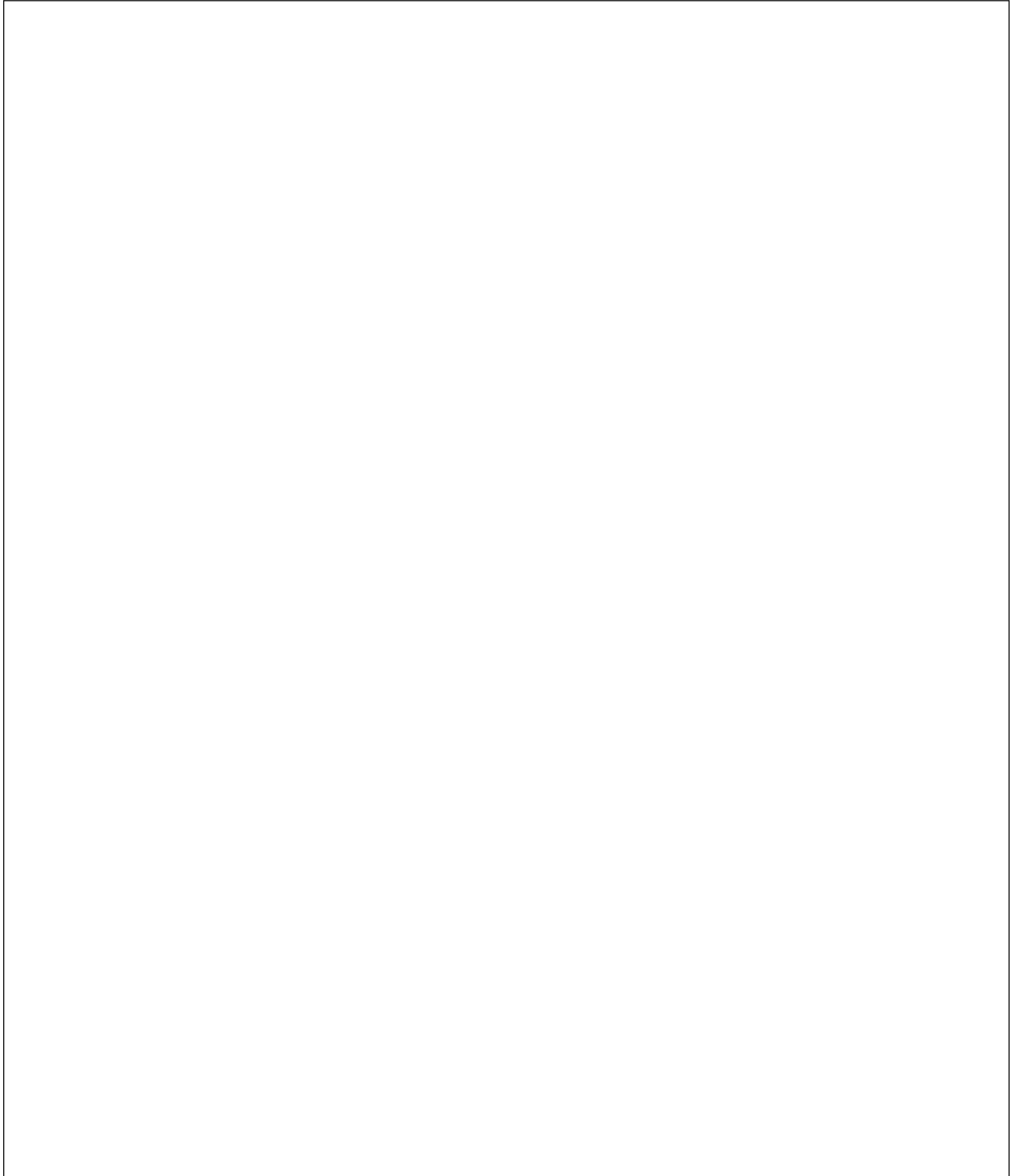
Administrative Proceedings

There are no administrative proceedings to report.

Self-regulatory (SRO) Proceeding

There are no self-regulatory organization proceedings to report.

Item 10 Other Financial Industry Activities and Affiliations



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

PWM requires the highest standard of professional performance from its employees and direct affiliates. Part of these high standards is maintaining compliance in letter and spirit with the corporate Code of Ethics. Responsibility for enforcing the code rests with the firm's President, Brian Pope. It is his obligation to review all employees' personal securities reports and any other material activities to ensure that the code is continually enforced.

Standards of Conduct

All employees and access persons of PWM are required at all times to observe all applicable Federal Securities Laws and to report immediately to the president any personal violations or observations of violations by other employees. In addition, all supervisory personnel are required to conduct their activities in contact with clients and potential clients in a manner consistent with the fiduciary nature of the advisory business.

Employee Trading

All supervisory personnel and other employees with access to or knowledge of specific client recommendations are required to report any and all trading in their own accounts. This requirement is satisfied by copying the President on all trades and having duplicate confirmations and statements sent to the President by the executing broker. In addition, any new employee or employee whose job description changes to include access to client recommendations and / or holdings must report existing holdings in their accounts within 10 days of the change of status or date of initial employment. Thereafter, personal holdings of all affected employees must be reported annually, even if no changes have occurred during the succeeding period.

Material Non-Public Information

All employees are to immediately report to the President any material non-public information concerning any security that may come into their possession.

Restricted Trading

In addition to the constraints and requirements above, all employees of any nature must receive prior approval from the CEO before participation in any initial public offering (IPO) or private placement of any nature.

Reporting Violations of the Code

Any employee who violates this Code or has reasons to believe they may have violated the Code should immediately report said violation or suspicion of violation to the CEO. Employees who witness or suspect a violation of the Code by another employee should report this violation or suspicion to the President immediately. To protect employees from retribution by violators or suspected violators, this report may be made directly to the President, who is obligated to maintain the employee's anonymity. It is Pope Wealth Management's stated goal that all employees will at times be cognizant of the Code of Ethics and that they will encourage their colleagues to maintain an open and compliant workplace.

Continuing Education Acceptance of the Code

All employees are to be given a copy of this Code and to acknowledge receipt in writing. Any amendments to this Code will be similarly circulated to be acknowledged in writing by current employees. In addition, through continuing education, changes to the Code will be discussed at the time they are enacted.

We will provide a copy of our code of ethics to any client of prospective client upon request. Employees of PWM invest in the same mutual funds / exchange traded funds that are recommended to clients. They employ the same diversification principles we provide to our clients as well.

Privacy Statement

PWM respects your privacy. We do not and will not sell, share or distribute any information provided to us. Your information will be held in confidence and only used for business (or potential business) transactions between PWM and client.

Factors Used to Select Custodians and/or Broker/Dealers

Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD #5393), is the preferred custodian. The custodian was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. PWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian. PWM does not directly hold any client funds or securities. All securities or fixed income transactions are executed by custodian.

Research and Other Soft-Dollar Benefits

PWM receives research, products, or other services from its broker / dealer or another third-party in connection with client securities transactions (“soft dollar benefits”). There is no minimum client number or dollar number the PWM must meet in order to receive free research from the custodian or broker / dealer. There is no incentive for PWM to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because the firm does not have to produce or pay for services or products, it has an incentive to choose a custodian that provides those services based on its interests rather than the client’s interests. The first consideration when recommending a broker/dealers to clients is best execution. PWM always acts in the best interest of the client.

Brokerage for Client Referrals

PWM receives no referrals from broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

PWM allows clients to direct brokerage: however, PWM may recommend custodians. PWM may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage PWM may not be able to aggregate orders to reduce transaction costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

Aggregating (Block) Trading for Multiple Client Accounts

PWM maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing PWM the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trades can cause more expensive trades for clients. The cost of non-aggregated (non-block) trades to the client are \$25 for mutual funds at Schwab. ETFs are not assessed a transaction charge.

Frequency and Nature of Periodic Review and Who Makes Those Reviews

Client accounts are reviewed at least quarterly by Brian Pope. Mr. Pope, as the chief advisor, is instructed to review client's accounts with regards to their investment policies and risk tolerance levels. All accounts at PWM are assigned to Mr. Pope for review.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client account including assets held and asset value which will come from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).

PWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to PWM clients.

Compensation to Non-Advisory Personnel for Client Referrals

PWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

PWM, with client written authority, has limited custody of client's assets through direct fee deduction of PWM's fees only. If the client chooses to be billed directly by Schwab Institutional, a division of Charles Schwab & Co., Inc., (CRD#5393) PWM would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Custody is also disclosed in Form ADV because PWM has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, PWM will follow the safeguards specified by the SEC rather than undergo an annual audit.

As a fiduciary, we have selected Nationwide Advisory Solutions as a vendor for clients who need a variable or immediate annuity. As part of the client portfolio, Nationwide Advisory Solutions offers guaranteed income riders to their variable annuity product that is appropriate for some client's goals of an income stream. PWM has vetted Nationwide Advisory Solutions and determined they are an appropriate vendor due to having no surrender charges and low fees. Client funds are held in custody by Nationwide Advisory Solutions.

Item 16 Investment Discretion

For those client accounts where PWM provides ongoing supervision, the client has given PWM written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides PWM discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and custodian.

Item 17 Voting *Client* Securities

PWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Balance Sheet

PWM does not require nor solicit prepayment of more than \$1200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither PWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

PWM has not been the subject of a bankruptcy petition in the last ten years.

Item 19 – Requirements for State -Registered Advisers

Educational Background and Business Experience of Principal Officer

The Principal Officer of PWM is Brian Pope. Information regarding the formal education and background of Mr. Pope is included in Item 2 of his Form ADV Part 2B – Brochure Supplement.

Other Business Activities of Principal Officer

None

Performance Fee Calculations

PWM does not charge performance-based fees for its investment advisory services. The fees charged by PWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding PWM or Mr. Pope. Neither PWM nor Mr. Pope have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against PWM or Mr. Pope.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violations of securities and other statutes; fraud; false statement or omissions; theft embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or disciplinary events to disclose regarding PWM or Mr. Pope.

Material Relationships with Issuers of Securities

Neither PWM or Mr. Pope have any relationships or arrangements with issuers of securities.