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Form ADV, Part 2B
Firm Brochure Supplement

February 26, 2025

www.WinslowDrake.com
CRD # 286638

This **Brochure Supplement** has been prepared by Winslow Drake, Inc. (hereinafter referred to as the "Company") on February 64, 2025.

This Brochure supplement provides information about Winslow Drake, Inc. that supplements the Winslow Drake brochure. You should have received a copy of that brochure. Please contact us at 213-596-8399, HLibby@WinslowDrake.com or 39015 Bel Air Dr., Cathedral City, CA 92234 if you did not receive Winslow Drake's brochure or if you have any questions about the contents of this supplement.

Additional information is available on the SEC's website at www.adviserinfo.sec.gov and www.WinslowDrake.com.

Item 2 - Educational Background and Business Experience

Haddon B. Libby, 62, serves as Founder and Managing Partner of Winslow Drake. Haddon was first registered as a broker-dealer in 1998 as denoted by a Series 7 examination. He subsequently took this examination a second time in January 2015 when starting Winslow Drake at Calton & Associates, Inc. where he was designated as a registered representative.

Calton & Associates, Inc. (CRD # 20999) is a broker-dealer firm where Haddon started this investment advisory business.

In March 2017, Winslow Drake became a State-Registered Investment Advisor and Haddon rescinded his ability to work as a broker-dealer and left Calton & Associates to operate strictly as a fee-only state-registered investment advisor. Mr. Libby has taken a Series 66 examination to operate as a state-registered investment advisor.

In April 2021, Winslow Drake converted to a sub-chapter S corporation domiciled in California.

Haddon graduated Summa Cum Laude from Northeastern University in Boston with a Bachelor of Science Degree in Business Administration with a Major in Finance where he was a Travelli Scholar and received the Ford Humanitarian Award. He began his career as the youngest management training at BNY-Mellon in their 230+ year history where he was worked in their London and New York City offices and trained under Tom Renyi, retired Chairman and CEO.

Haddon first took the Series 7 and 63 examinations in 1998 where he was a dual employee of Bank of America and Banc of America Securities serving the banking and investment banking needs of banks across the United States. Haddon was employed at Bank of America from 1992 to 2004 where he also served as Senior Vice President of the Bank of America Private Bank serving the Palm Springs market from 2001 through 2004.

Haddon has also served as the Chief Financial Officer, Regional Director and Credit Analyst for other financial institutions.

From 2011 to 2014, Haddon served as co-founder and finance director of the non-profit ShareKitchen which incubated approximately three dozen start-up businesses.

Since 2014, Haddon has been a broker-dealer and investment advisor at Calton & Associates where he started the Winslow Drake investment management practice. As Winslow Drake has grown and only operates in an investment advisory capacity, Haddon decided in 2017 to give up the broker-dealer license and register as an independent investment advisory so that he could better educate clients and eliminate the inherent potential for conflicts of interest that a broker-dealer may have from time to time. Working strictly as a fee-based investment advisory practice eliminates any hidden charges or third-party payments that broker-dealers can earn when managing client investments.

For 2020 and 2021, Winslow Drake was named Small Business of the Year by the Cathedral City Chamber of Commerce.

It should be noted that passing any Series examination does not mean that such an individual is registered or licensed.

Item 3 - Disciplinary Information

Haddon Libby has never had any legal or disciplinary action taken against him. Please go to FINRA's BrokerCheck link at www.finra.org/brokercheck for more information. Additional information can also be found in the Firm Brochure for Winslow Drake.

More specifically, Haddon Libby (hereafter referred to as “supervised person”) has never been party to:

- A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person 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. The supervised person has never been 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; was found to have been involved in a violation of an investment-related statute or regulation; or 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.
- B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person was found to have caused an investment-related business to lose its authorization to do business; or 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 (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment- related business; (b) barring or suspending the supervised person's association with an investment-related business; (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on the supervised person.
- C. A self-regulatory organization (SRO) proceeding in which the supervised person was found to have caused an investment-related business to lose its authorization to do business; or was found to have been involved in a violation of the SRO's rules and was: (i) barred 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 \$2,500.00.
- D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. The supervised person has never resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment).

Item 4 - Other Business Activities

Haddon Libby serves as Vice President to the Board of Directors of Cabot's Pueblo Museum. This requires approximately 4 hours per month. Haddon writes a weekly column for CV Weekly requiring approximately 6 hours per month. All told, Mr. Libby is involved in Outside Business Interests that consume 10 hours per month.

Haddon does not receive compensation of any kind from any Other Business Activities.

Item 5 - Additional Compensation

Haddon Libby only receives compensation as it relates to his work at Winslow Drake.

Item 6 - Supervision

Haddon Libby supervises his own work. Please refer to Item 11 of Form ADV Part 2A as it relates to our Code of Ethics. In short, we have a fiduciary duty to clients and conduct our financial affairs to avoid putting our personal interests ahead of our clients. As a fiduciary, we must always act in a client's best interests.

All client funds are held by third party custodians such as TD Ameritrade Institutional, Pentegra Retirement Services, John Hancock Distributors, The Capital Group (American Funds) and ADP Retirement Services as well as other service providers that may be required from time to time.

Item 7 - Requirements for State-Registered Advisers

Haddon Libby has never had or paid an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Haddon Libby has never had or paid an award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving an investment or an investment-related business or activity, fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Haddon Libby has never been the subject of a bankruptcy petition.