

**Hirst Wealth Management, Inc.**  
**Form ADV Part 2A**  
**Investment Adviser Brochure**

March 2011

This brochure provides information about the qualifications and business practices of Hirst Wealth Management, Inc. If you have any questions about the contents of this brochure, please contact Leonard T. A. Hirst, President and Chief Compliance Officer. 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 Hirst Wealth Management, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2: Summary of Material Changes

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### **Introduction**

In July, 2010, the United State Securities and Exchange Commission published a new rule “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure is a new document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to Hirst Wealth Management, Inc.’s (HWM or the Firm) Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

### **Full Brochure Available**

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, HWM’s Brochure may be requested by contacting Leonard T. A. Hirst, President and Chief Compliance Officer, at 508.636.3595 or [www.hirstwealthmanagement.com](http://www.hirstwealthmanagement.com).

Additional information about HWM is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with HWM who are registered, or are required to be registered, as investment adviser representatives of HWM.

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## Item 4: Advisory Business

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### **Firm Description and Types of Advisory Services**

HWM is an investment adviser. HWM provides investment advisory services to individuals, pension and profit sharing plans, trusts, and charitable organizations. These services include financial planning services, portfolio management for individuals and/or small business, and portfolio management for businesses or institutional clients (other than investment companies).

HWM was founded in 2002.

### **Principal Owners**

HWM is owned solely by Leonard T. A. Hirst, President and Chief Compliance Officer.

### **Types of Advisory Services**

#### **Investment Advisory Services**

HWM provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, HWM develops a client's personal investment policy and creates and manages a portfolio based on that policy. HWM will manage advisory accounts on a discretionary basis only. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, growth and income, etc.). HWM may also offer these services to clients with Vanguard variable annuity products, whereby HWM will manage the underlying variable annuity sub-accounts on behalf of the client.

HWM will create a portfolio consisting of one or all of the following: individual equities, bonds, other investment products, and no-load or load-waived mutual funds. HWM will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. Mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

### **Financial Planning**

HWM also provides financial planning, only available to clients who have or will contract with HWM for Investment Advisory Services. HWM will not accept any clients who only wish to contract with HWM for financial planning.

Financial planning may address any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.
- Education: Education IRAs, financial aid, state savings plans, grants and general assistance in preparing to meet dependents continuing educational needs through development of an education plan.
- Tax Cash Flow: Income tax and spending analysis and planning for past, current and future years. HWM will illustrate the impact of various investments on a client's current income tax and future tax liability.
- Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: Analysis of investment alternatives and their effect on a client's portfolio.
- Estate: Living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long term care, liability, home and automobile.

Financial planning clients may receive a written report, providing a detailed financial plan designed to achieve their stated financial goals and objectives.

HWM gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents including a questionnaire completed by the client, supplied by the client are carefully reviewed, and a written report is prepared. If a client chooses to implement the recommendations contained in the plan, HWM suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Financial planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company.

### **Consulting**

HWM also offers investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, reviewing a client's existing portfolio, or any other specific topic. Additionally, HWM may provide advice on non-securities matters; generally, in connection with the rendering of estate planning, insurance, and/or annuity advice.

### **Tailored Relationships**

HWM tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. HWM clients are allowed to impose restrictions on the investments in their account. HWM may accept any reasonable limitation or restriction

to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to HWM in writing.

### **Wrap Fee Programs**

HWM does not participate in a Wrap Fee Program.

### **Client Assets**

As of December 31, 2010, HWM manages approximately \$70 million in assets; all assets are managed on a discretionary basis.

## **Item 5: Fees and Compensation**

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### **Compensation**

HWM bases its fees on a percentage of assets under management, hourly charges, and fixed fees.

Financial plans are priced according to the degree of complexity associated with the client's situation.

HWM's fee schedules are described below.

#### **Compensation – Investment Advisory Services**

The annual fees for HWM portfolio management services are 1.50% of assets under management. Clients will be invoiced in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Asset Management Agreement. Existing clients may have been grandfathered in from a lower fee schedule.

#### **Compensation – Financial Planning and Consulting Services**

Financial Planning and Consulting fees will be charged in one of two ways:

- As a fixed fee, typically ranging from \$1,000 to \$5,000, depending on the nature and complexity of each client's circumstances, or
- On an hourly basis of \$250 per hour.

All financial planning and consulting fees are due in arrears, upon presentation of the financial plan or consulting engagement for the client.

### **Agreement Terms**

A client may terminate the client agreement at any time by notifying HWM in writing. Any earned, unpaid fees will be due and payable upon termination.

## **General Information on Compensation and Other Fees**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

HWM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Such charges, fees and commissions are exclusive of and in addition to HWM's fee, and HWM shall not receive any portion of these commissions, fees, and costs.

All fees paid to HWM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and variable annuity sub-accounts to their shareholders. These fees and expenses are described in each fund's or sub-account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or sub-account directly, without the services of HWM. In that case, the client would not receive the services provided by HWM which are designed, among other things, to assist the client in determining which mutual funds or sub-accounts are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds/sub-accounts and the fees charged by HWM to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

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

Neither HWM nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).



HWM does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Item 7: Types of Clients

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### **Types of Clients**

As described in Item 4, HWM's clients include individuals, pension and profit sharing plans, trusts, and charitable organizations.

### **Account Minimums**

HWM requires a minimum account of \$150,000 for Investment Advisory clients, although this may be negotiable under certain circumstances. HWM may group certain related client accounts for the purposes of achieving the minimum account size.

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

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### **Methods of Analysis**

HWM may employ the following security analysis methods: Charting; fundamental analysis; and technical analysis.

HWM uses the following main sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission (SEC), and company press releases.

Other sources of information that HWM may use include information from investment managers, financial service companies, data base companies, Morningstar mutual fund information, Charles Schwab & Company's, Advisor Intelligence, and the Internet.

### **Investment Strategies**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

HWM offers the following strategies: Income Only; Conservative Balanced; Balanced; Equity Tilt and Equity. Other strategies may include long-term and short-term purchases.

When appropriate to the needs of the client, HWM may recommend the use of margin transactions or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

## **Risk of Loss**

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. HWM's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Initial Public Offerings**

HWM typically does not participate in initial public offerings on behalf of its clients.

## Item 9: Disciplinary Information

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### **Legal and Disciplinary**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of HWM or the integrity of HWM's management. HWM has no information to disclose applicable to this Item.

## Item 10: Other Financial Industry Activities and Affiliations

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### **Financial Industry Activities – Broker-Dealers**

HWM is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

### **Financial Industry Activities – Futures and Commodities**

Neither HWM nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Affiliations – Law Firm**

HWM has a material relationship or arrangement with related persons or financial industry entities as a lawyer or law firm.

The President of HWM, Leonard T.A. Hirst II, is also Sole Proprietor of Hirst Law Offices (Law Office). The Law Office is a Massachusetts licensed and practicing lawyer providing legal services for separate and typical compensation. Legal advice is limited to residents of Massachusetts. Mr. Hirst may provide advice regarding tax and estate planning, as well as other matters that do not fall within investment advisory services.

The Law Office may recommend HWM to legal clients in need of advisory services and vice versa. Legal services provided by the Law Office are separate and distinct from the advisory services of HWM, and are provided for separate and typical compensation. There are no referral fee arrangements between HWM and Law Office for these recommendations. No HWM client is obligated to use the Law Office for any legal services and conversely, no legal client of the Law Office is obligated to use the advisory services provided by HWM. The Law Office's legal services do not include the authority to sign checks or otherwise disburse funds on any HWM advisory client's behalf. Mr. Hirst spends approximately 10% of his time with this other activity.

### **Other Investment Advisors**

HWM does not recommend or select other investment advisors for its clients.

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

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### **Code of Ethics**

HWM employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Leonard T. A. Hirst, President and Chief Compliance Officer, reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of HWM receive preferential treatment.

HWM's employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of HWM's Code of Ethics by contacting Leonard T. A. Hirst at 508.636.3595.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

HWM and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of HWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of HWM's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest between HWM and its clients.

### **Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross**

HWM and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is HWM's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. HWM will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

## Item 12: Brokerage Practices

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### **Research and Other Soft Dollar Benefits**

HWM does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in "Directed Brokerage – Other Economic Benefits".

### **Brokerage for Client Referrals**

HWM does not receive client referrals from broker/dealers.

### **Directed Brokerage**

While not routine, the client may direct HWM to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and HWM will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by HWM. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to its duty of best execution, HWM may decline a client's request to direct brokerage if, in HWM's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests HWM to arrange for the execution of securities brokerage transactions for the client's account, HWM shall direct such transactions through broker-dealers that HWM reasonably believes will provide best execution. HWM shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

HWM shall generally recommend that portfolio management clients establish brokerage accounts with Schwab, a registered broker-dealer, member FINRA/SIPC, to maintain custody of clients' assets and to effect trades for their accounts.

HWM is independently owned and operated and not affiliated with Schwab. Schwab provides HWM with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis **and are not otherwise contingent upon HWM committing to Schwab any specific amount of business** (assets in custody or trading).

For HWM's client accounts maintained there, Schwab is compensated through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. The brokerage commissions and/or transaction fees charged by Schwab or any other designated broker-dealer are exclusive of and in addition to HWM's fees.

### **Directed Brokerage – Other Economic Benefits**

HWM may receive from Schwab, at no cost to HWM, professional services, computer software and related systems support, enabling HWM to better monitor client accounts maintained at Schwab. HWM may receive this support without cost because of the portfolio management services rendered to clients that maintain assets at Schwab. The support provided may benefit HWM, but not its clients directly. In fulfilling its duties to its clients, HWM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that HWM's receipt of economic benefits from a broker-dealer may create a conflict of interest since these benefits may influence HWM's choice of broker-dealer over another broker-dealer that does not furnish similar services, software and systems support.

The commissions paid by HWM's clients shall comply with HWM's duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where HWM determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while HWM will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

### **Trade Aggregation**

HWM does not aggregate or block trades.

## Item 13: Review of Accounts

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### **Reviews**

The underlying securities within Portfolio Management client accounts are continuously monitored, and client accounts are formally reviewed at least quarterly by Leonard T. A. Hirst.

### **Review Triggers**

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

### **Reporting**

Portfolio Management clients receive at least quarterly statements and confirmations of transactions from their custodian. HWM will provide upon client request a quarterly consolidated position report.

### **Financial Planning – Reviews and Reporting**

Financial Planning and/or Consulting clients will be reviewed and receive reports as contracted for at the inception of the engagement.

## Item 14: Client Referrals and Other Compensation

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### **Other Compensation**

HWM does not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

### **Other Compensation – Brokerage Arrangements**

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

### **Compensation – Client Referrals**

HWM does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Item 15: Custody

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### **Custody – Fee Debiting**

HWM has one form of custody. Clients may authorize HWM (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified

custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and HWM. The custodian is advised in writing of the limitation of HWM's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to HWM.

While HWM will assist clients in establishing and maintaining accounts at the custodian, HWM shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

### **Custody – Account Statements**

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that HWM provides. HWM statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading and Limited Power of Attorney**

Through the investment management agreement, HWM may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows HWM to execute trades on behalf of clients.

When such limited powers exist between the HWM and the client, HWM has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, HWM may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to HWM in writing.

However, HWM consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

## **Item 17: Voting Client Securities**

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### **Proxy Voting**

HWM does not have any authority to and does not vote proxies on behalf of clients. HWM also does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation. Clients retain the responsibility for receiving and voting proxies and any legal proceedings for securities maintained in their portfolios; clients receive these corporate actions from directly from either custodians or transfer agents.



If requested, HWM may provide advice to clients regarding proxy votes and legal proceedings. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Leonard T. A. Hirst at 508.636.3575 for information about proxy voting.

## Item 18: Financial Information

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### **Financial Condition**

HWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

HWM is not required to provide a balance sheet; HWM does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## Other Information

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### **Privacy**

HWM is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver our Privacy Notice to you annually, in writing.

### **Business Continuity Plan**

HWM has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers natural and man-made disasters. Electronic files are backed up daily and archived offsite.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. HWM's intention is to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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**Hirst Wealth Management, Inc.**  
**Form ADV Part 2B**  
**Investment Adviser Brochure Supplement**

Supervisor and Supervised Person:  
Leonard T. A. Hirst II

March 2011

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Hirst Wealth Management, Inc.'s brochure. You should have received a copy of that brochure. Please contact Leonard T. A. Hirst, President and Chief Compliance Officer, if you did not receive Hirst Wealth Management, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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Westport, MA 02790  
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[lenny@hirstwealthmanagement.com](mailto:lenny@hirstwealthmanagement.com)  
[www.hirstwealthmanagement.com](http://www.hirstwealthmanagement.com)

## Educational Background and Business Experience

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### **Education and Business Background**

HWM requires those individuals who determine or give investment advice have a college degree and/or experience requirements. Generally, this means individuals must possess a college degree and/or appropriate industry investment experience. Individuals must be properly licensed and registered, in states in which they are conducting investment advisory business, as applicable.

### **Professional Certifications**

Leonard T. A. Hirst maintains professional designations, which required the following minimum requirements:

#### **CFP - Certified Financial Planner**

**Issued by:** Certified Financial Planner Board of Standards, Inc.

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

**Educational Requirements:** Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

**Examination Type:** CFP Certification Examination

**Continuing Education/Experience Requirements:** 30 hours every 2 years

### **Supervised Persons**

**Leonard T. A. Hirst II**

*Born: 1960*

#### **Education:**

BS, Finance, University of Massachusetts  
MBA, University of Massachusetts

JD, Southern New England School of Law

**Business Background:**

Hirst Wealth Management, Inc. President and Chief Compliance Officer	2002 to Present
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Hirst Law Offices Sole Proprietor	2003 to Present
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**Professional Designations and Licenses:**

Certified Financial Planner, CFP®  
Uniform Securities Agent State Law Examination - (Series 63)  
Uniform Investment Adviser Law Examination - (Series 65)

## Disciplinary Information

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**Disciplinary Information**

Neither HWM nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## Other Business Activities

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**Other Business Activities**

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above. These Outside Business Activities do not create a material conflict of interest with clients.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither HWM nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

## Additional Compensation

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No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

## Supervision

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### **Supervision**

Leonard T. A. Hirst is the only Supervised Person named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Leonard T. A. Hirst may be reached at 508.636.3575.