

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

**Disclosure Document
SEC Form ADV, Part 2A
March 16, 2012**

Braver Wealth Management, LLC

117 Kendrick Street, Suite 800
Needham, MA 02494

Telephone Number: 617-969-0223

Fax: 617-969-0224

Website Addresses: www.braverwealth.com
www.thebravergroup.com
www.bravercapital.com

This brochure provides information about the qualifications and business practices of Braver Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 617-969-0223 or email us at info@braverwealth.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.

Additional information about Braver Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes from June, 2011

On March 1, 2012, Braver Wealth Management, LLC eliminated the performance fee for its Sector Rotation investment strategy. This elimination is effective with the first quarter billing.

On March 13, 2012, David J. D'Amico, President of Braver Wealth Management LLC, replaced James M. Philbin as Chief Compliance Officer.

On March 13, 2012, Braver Wealth Management, LLC, General Partner, of Tandem Sector Rotation, LP, announced the closing of this Limited Partnership. Currently there are two clients in this LP. It is anticipated that liquidation will be completed by June 30, 2012.

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Advisory Business

Braver Wealth Management, LLC (“BWM”), formerly known as Tandem Financial Services, Inc. (“TFS”) was founded in 1987 by Joseph B. & Judith D. Ludwig. In January 2002, TFS was sold to Braver P.C., and Braver Wealth Management, Inc. was formed. On April 15, 2008, Braver Wealth Management, Inc. contributed its assets and liabilities to Braver Wealth Management, LLC. Braver Wealth Management, Inc. owns 97% of Braver Wealth Management, LLC. Braver Wealth Management, Inc.’s stock is owned by Tandem Financial Services, Inc., an S corporation. A controlling interest in the stock of Tandem Financial Services, Inc. is owned by shareholders who are also shareholders of Braver, P.C., a Massachusetts professional corporation.

Currently, David J. D’Amico is Co-Managing Member of BWM and President of Braver Wealth Management, Inc. The following individuals are also Co-Managing Members of BWM:

Dennis S. Pellechia
Patrick B. Riley
James M. Philbin
Joseph B. Ludwig
Judith D. Ludwig

The company provides investment services, financial planning and estate planning. We work closely with clients to design custom portfolios using various investments programs. The investment plan is tailored to clients’ specific objectives, time horizon, tax and financial status, and risk tolerance.

BWM differentiates itself from other investment advisory firms through our proprietary, quantitative investment strategies that we refer to as ‘Wealth Preservation Strategies’. These specialized, proprietary strategies are designed to reduce portfolio risk through computer models that track various market technical indicators and trends. And they have the capability to tactically move a portion or all of the portfolio to the safety of money market vehicles (cash like investments) when market trends deteriorate. Within these strategies we employ risk control measures to further attempt to mitigate down market risk and severe negative performance. These are not ‘buy & hold’ or ‘fully invested’ strategies but are actively managed on a daily basis and seek to provide competitive returns while attempting to avoid major market corrections. Our philosophy is that it is more important to avoid major market corrections than it is to capture every component of a market’s upward advance.

BWM has 16 employees; 11 of them are client relationship managers (“RMs”). Each RM is responsible for approximately 60 client relationships. In addition, to ensure continuity of service, each client relationship has a secondary RM as a backup.

Investment advice is determined and rendered by James M. Philbin, David J. D’Amico, Joseph B. Ludwig, Judith D. Ludwig, Andrew P. Griesinger, Deborah H. Levenson, Bradley K. Sharp, Charles M. Toole, David A. Fontaine, Robert D. Lepson and Mary K. Hoey (f/k/a Konetzny).

As of 12/31/11 BWM managed 395 relationships on a discretionary basis totaling \$529,336,631 in assets and provides consultation services on 40 relationships totaling \$61,406,038

BWM’s investment recommendations comply with current laws and client assets are managed as follows:

- ***Initial Interview*** – At the outset of the relationship, BWM obtains client information sufficient to determine the client’s financial situation and investment objectives, and allow the client the opportunity to impose reasonable restrictions upon BWM’s management.
- ***Individual Treatment*** – BWM manages the client’s accounts based on their financial situation and investment objectives.
- ***Quarterly Notice*** – At least quarterly BWM notifies the client to advise BWM whether their financial situation or investment objectives have changed.
- ***Annual Contact*** – At least annually, BWM contacts the client to determine if their financial situation or investment objectives have changed, or if they want to impose and/or modify any reasonable restrictions on the management of their accounts.
- ***Consultation Available*** – BWM is reasonably available for consultations regarding the status of their accounts.
- ***Quarterly Statement*** – Quarterly statements are sent to clients containing a description of all activity in their accounts during the preceding period.
- ***Ability to Impose Restrictions*** – The client has the ability to impose reasonable restrictions on the management of their accounts including the ability to instruct BWM not to purchase certain securities.
- ***No Pooling*** – The client’s beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client’s account.

- ***Separate Account*** - A separate account is maintained for the client with the Custodian.
- ***Ownership*** – Each client retains, among other things, the right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations and statements.

BWM consults clients on the use of individual securities, mutual funds, exchange traded funds (ETFs), variable annuities, and variable universal life insurance policies as investment vehicles and the various families of mutual funds, mutual fund/brokerage platforms, and insurance products which are available. BWM offers the following investment programs: Asset Allocation, Dividend Income, Strategic Portfolio, Municipal Bond Fund Investment, Tactical High Yield Bond Fund Investment (f/k/a High Yield Bond Fund Investment), Tactical Equity Opportunity (f/k/a Diversified Asset), Tactical Balanced (f/k/a Tactical Allocation), Tactical Equity Sector Rotation (f/k/a Sector Rotation), Country Rotation, Individual Equity and Individual Taxable and Tax Exempt Fixed Income. A mutual fund family, brokerage/custodian platform, or an insurance company product and investment program(s) are selected based on individual client needs, philosophies and tax status.

The client gives BWM the authority to execute transactions by moving his/her money from one mutual fund, ETF, equity, bond or insurance sub-account to another within the selected financial institution. Investment determinations are based on analysis of pertinent data, as well as general market and economic reviews. The service also includes execution and confirmations of transactions.

BWM's investment programs may involve above-average portfolio turnover that could negatively impact the net after-tax gain experienced by an individual client in non-qualified accounts.

The mutual funds, ETFs and equities and bonds which BWM may invest client funds are likely to have differing degrees of risk.

None of the investments is "risk-free", and certain mutual funds, particularly mutual funds which invest in futures contracts, stock index futures contracts, options on stock index futures contracts, and options on securities and stock indices, have a substantial amount of risk.

BWM directs the brokerage trades through the custodian of record for the client portfolio. The selection of the custodian is dependent on a combination of the best services available at the most reasonable price. With respect to brokerage commissions, BWM utilizes its aggregate relationship with the custodian/broker to negotiate the lowest commission rates possible. BWM compares its commission structure to the retail marketplace to ensure we maintain an 'institutional' advantage over a typical retail client. We also compare our commission rates to the competitive landscape for like institutional investors to ensure competitive and fair pricing. We actively revisit the commission structure multiple times throughout the year seeking to obtain the lowest possible commission rates for our clients. We proactively negotiate the lowest possible commission structure for our clients.

The choice of custodian/broker is based on the best delivery, technology, and trading ability of the underlying custodian/broker and not based on products or services received. Firm stability, reputation, and the ability to most effectively safeguard our clients assets are all major factors for choice of custodial/brokerage services for our clients.

BWM requires a minimum of \$1,000,000 committed to one or more of its investment management programs. All minimums are negotiable.

The Tactical Equity Opportunity strategy with the performance fee schedule is closed but several legacy clients remain in this strategy. The following minimum conditions were imposed before a client was accepted:

1. Eligible Clients. The client must be a natural person, or a company as defined in paragraphs (b) (2) and (g) (1) of Reg. 275.205-3 under the Investment Advisors Act of 1940. The client must have a net worth, at the time the contract is entered into, in excess of \$1,500,000 or place a minimum of \$750,000 under management with BWM.
2. Minimum Account. The client must commit a total of at least \$100,000 in this program.
3. Arm's Length Contract. All clients must sign a standard performance fee contract. Immediately before entering into a contract with a client, BWM must reasonably believe that the contract represents an arm's length arrangement between BWM and the client and that the client (or in the case of a client which is an eligible entity, the person representing the entity), alone or in conjunction with the client's independent agent, understands the proposed method of compensation and its risks.
4. Disclosure Statement. Prior to entering into a contract with a client, in addition to the requirements of Form ADV, BWM discloses to the client all material information concerning the proposed performance fee contract, including the following:
 - a) That the fee arrangement may create an incentive for BWM to make investments that are riskier or more speculative than would be the case in the absence of a performance fee.

- b) That BWM may receive increased compensation with regard to unrealized appreciation as well as realized gains in the client's account, under formula for calculating fees.
- c) The periods that will be used to measure investment performance throughout the contract and its significance in the computation of the fee.

As stated previously, BWM also provides financial planning, estate planning and tax services, which includes assisting in major financial decisions; developing cash flow forecasts; retirement planning and assisting in the establishment of retirement plans; coordinating the estate planning process; reviewing insurance coverage and risk; tax planning and tax return preparation.

James M. Philbin and Judith D. Ludwig, spend most of their time (except for time spent on administrative matters) on financial planning. Deborah H. Levenson, Bradley K. Sharp, Robert D. Lepson and Mary K. Hoey also provide financial planning advice.

Fees and Compensation

Fees derive from (1) investment supervisory services, (2) investment advisory account services, (3) financial planning and tax services. For some clients investment supervisory services is provided in addition to managing investment accounts for them; for other clients only a portion of their investments is managed without investment supervisory services being provided. All fees are negotiable.

Investment supervisory services, financial planning and tax services are billed hourly at rates ranging from \$95 to \$350 per hour. Bills for services rendered are sent at the completion of an assignment or, for continuing clients, at the end of each month. Payments are due within 30 days of billing. The client may terminate financial planning services at any time, upon payment of all outstanding time charges.

Investment management fees are continuous and all clients receive a quarterly bill. The client may choose to have fees automatically deducted from one or more of their investment accounts or pay by check.

For investment accounts, BWM gives a 20% discount to charitable and non-profit organizations. The shareholders and principals of Braver, P.C. and other affiliated companies may have services provided to them at no charge. Other employees and immediate family members of shareholders and principals of Braver, P.C. and affiliated companies may have services provided to them at a 50% discount

Mutual funds, exchange traded funds, and insurance products, the investment vehicles used, each have their own investment management fees to manage the portfolios and administrative expenses to perform the appropriate administration. BWM's investment management fees are over and above these fees. The Fixed Fee schedule for continuous management for all assets combined in BWM's Asset Allocation, Strategic Portfolio, Country Rotation, Dividend Income, Municipal Bond, Individual Equity, Individual Taxable and Tax Exempt Fixed Income, Tactical High Yield Bond, Tactical Balanced, Tactical Sector Rotation and the fixed fee option of Tactical Equity Opportunity is listed on the following page.

BWM's fees are based on assets under management and are as follows:

First \$2,500,000 *	1.00% per year (0.25% per quarter)
Next \$2,500,000 to \$5,000,000	0.8% per year (0.20% per quarter)
Next \$5,000,000 to \$10,000,000	0.6% per year (0.15% per quarter)
All assets over \$10,000,000	0.4% per year (0.10% per quarter)

BCM's fees are as follows:

Charged as a percentage of assets under management typically 0.25% to 0.75% and is negotiable for relationships greater than \$10,000,000 (based on the platform, strategy, account size and level of service responsibility).

For dual contract BCM clients the fees may vary, but will typically be between .50% to 1.00 % depending on the level of portfolio management and service responsibility assumed by BCM. Additional platform and/or custodial fees will apply and trading fees will vary by custodian. Dual contract, as defined by BWM, is the relationship a client has with two, exclusive advisors. The client will have a contract with their primary financial advisor at an independent custodian, while also hiring BCM under a second (or dual) contract.

BCM reserves the right to waive a portion, or all, of a client's fee, and may waive the minimum account size.

A BWM or a BCM fee schedule is included as part of the contract and is also available upon request. There are separate fee schedules for regular and dual contract relationships

For an additional fee, BWM may provide financial planning services, tax preparation, and accounting services. The cost for these services is negotiable and will vary depending on the complexity of the clients' finances, time to complete, and considering whether or not BMW manages the clients' assets

*Fee for AUM relationships \$500,000 or less is 1.25% per year

Performance-Based Fees and Side-by-Side Management

BWM is no longer offering performance based fees but legacy accounts still exist.

Diversified Asset Program (Combined Fixed and Performance Fee Option):

In the past, clients could choose a schedule which includes both a fixed fee element and a performance fee element. Clients electing this fee schedule must have met certain requirements as established by the Securities and Exchange Commission under Rule 205-3 under the Investment Advisers Act of 1940, adopted by the SEC on November 14, 1985 and amended on August 20, 1998. This fee schedule, which is intended to comply with the rule cited above, is as follows:

- a. Period: The fee is calculated annually.
- b. Fixed Fee Portion: The fixed portion on the fee is 0.5% per year of assets under management.
- c. Minimum Performance: The minimum performance target for each client's account is a total return of 16% per year based upon start date. For this purpose "total return" is defined as net realized and unrealized capital gains and losses, plus interest, dividends and distributions, for the year. If the minimum performance target is not achieved, no performance fee is charged.
- d. Performance Fee Portion: If the total annual return on the client's account for the year is in excess of 16%, then a fee equal to one-half of the amount by which the total return exceeds 16% will be payable
- e. Total Fee: The total fee is the fixed fee portion plus the performance fee portion.

Payments are due within thirty (30) days of billing. All investment advisory agreements may be terminated by either party upon thirty (30) days written notice. Upon termination, a final fee is calculated on a pro-rata basis.

Types of Clients

BWM provides investment services to the following:

- Individuals
- Pension and profit sharing plans
- Trusts, estates and charitable organizations
- Corporations and other business entities
- Joint ownerships and partnerships
- Institutions
- Other investment advisors
- Third party asset management platforms

Methods of Analysis, Investment Strategies and Risk of Loss

BWM's security analysis methods include:

- Fundamental Analysis
- Technical Analysis and Trend Following
- Proprietary Computer Models

Primary sources of information include:

- Annual reports, prospectuses, filings with the SEC
- Financial newspapers and magazines
- Research materials prepared by various services
- Data feeds (i.e. Reuters, Morningstar)

Investment strategies used to implement any investment advice given to clients include:

- Long term purchases (securities held at least a year)
- Short term purchases (securities sold within a year)
- Trading (securities sold within 30 days)

BWM's portfolio management process is unique in the industry. We combine our proprietary fundamental 'fully invested' strategies with our proprietary computer model, tactical strategies (strategies that are actively managed on a daily basis and can move to the safety of cash when market trends deteriorate providing an element of down market risk control) to devise a clients total portfolio. Our RMs work with each client to customize the mix of BWM strategies based on their unique goals and objectives.

Our Fundamental 'fully invested' strategies are diversified across a wide range of individual securities, ETF's, and/or mutual funds. These securities may be a combination of stocks, bonds, commodities, real estate, and hedged equity. These portfolios seek to reduce risk through their diversification but will remain 'fully invested' in the underlying asset classes regardless of financial market conditions. As such, they remain exposed to the financial markets on a daily basis and are subject to market risk. Clients should consider and understand the return opportunities over the long term while understanding the risk of loss in the short term due to the fully invested exposure to the capital markets.

Our proprietary computer models, 'Tactical Strategies' are actively managed on a daily basis and frequent trading may occur. These strategies which we refer to as 'Wealth Preservation' are designed to reduce risk of a major market correction while seeking to provide the opportunity for a competitive return. Each day, our investment team analyzes the output from our computer models that determine to invest in the underlying investment vehicle or remain in the safety of money market vehicles. Frequent trading may reduce net performance to the client through increased trading commissions as well as the potential for higher taxes due to possible short term capital gains.

In its role as an investment advisor, BWM reviews and analyzes many types of investments, both initially and on an ongoing basis. These are categorized as Alternative Investments and some of them may be recommended to clients. These investments may include Separate Account Managers, Hedge Funds, Funds of Hedge Funds, Commodity Funds, Real Estate Partnerships and Syndications, Venture Capital, and Private Equity. BWM does this review and analysis on a totally objective basis and receives no compensation, either direct or indirect, from the managers of these investment vehicles.

Disciplinary Information

There are no disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

BWM is related to Braver, P.C., an accounting and advisory firm, through similar ownership.

As previously mentioned, BWM is the General Partner of Tandem Sector Rotation, LP which should be liquidated by June 30,2012

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

As a fiduciary, BWM has an affirmative duty to act in the best interests of its clients.

Employees are also expected to act in the best interests of clients and place clients' interests before their own.

- They have an obligation to protect the company's reputation by conducting business with the honesty and integrity expected of an investment professional.
- They should use particular care in determining the applicable fiduciary duty and shall comply with such duty.

Employees shall not engage in any conduct involving dishonesty, fraud, deceit, or misrepresentation, or commit any act that reflects adversely on their honesty, trustworthiness, or professional competence.

Failure to comply with BWM's Code of Ethics may result in disciplinary action, including termination of employment. A copy of our complete Code of Ethics is available upon request.

BWM and its employees, officers, directors and stockholders may buy and own many of the same individual securities, exchange traded funds, mutual funds and variable annuities that are utilized for clients' investments. Because of the size of the funds/products used there is deemed to be no conflict of interest.

With respect to individual securities and ETFs, BWM has adopted policies and procedures which it believes precludes its employees from receiving more favorable prices than clients.

Brokerage Practices

The choice of custodian/broker is based on the best delivery, technology, and trading ability and not based on products or services received. Firm stability, reputation, and the ability to most effectively safeguard clients assets are all major factors when choosing custodial/brokerage services.

BWM has arrangements with custodians that provide “institutional platform services”. The services include among other things, brokerage, custody and other related services. The custodians’ services that assist BWM in managing and administering clients’ accounts include software and other technology that provide access to client account data; facilitate trade execution and allocate aggregated trade orders for multiple clients’ accounts; provide research, pricing and other market data; facilitate payment of fees from its clients’ accounts and other back-office functions.

The custodians may also offer other services intended to help BWM manage and develop its advisory practice. Such services may include performance reporting, financial planning, contact managements systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party services with whom BWM may contract directly.

BWM is independently owned and is not affiliated with any custodian. The custodians generally do not charge its advisors separately for custody services but is compensated by the account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed by the custodian or that settle into custodian accounts.

BWM does not have a “soft dollar” arrangement with any custodians. However, on occasion a custodian, for example, may provide a portion of financial assistance to retain a marketing consultant.

BWM participates in the Fidelity Wealth Advisor Solutions program (“WAS”). WAS is a referral program designed to introduce high net worth investors to independent advisors. BWM does not pay a fee to participate in this program. BWM’s participation in the program may raise potential conflicts of interest. BWM may have an incentive to recommend that the clients custody their assets with Fidelity.

Review of Accounts

Client portfolios are reviewed regularly at various levels of the organization. At least annually, the RMs schedule reviews with their clients to discuss performance, asset allocation, appropriateness of investments, risk and constraint factors and for client updates to personal situations.

In addition to formal annual client reviews, our investment programs are overseen daily, weekly and quarterly. Any changes that occur at the portfolio level are thoroughly researched and reviewed. Frequently, portfolio changes warrant a complete client review that is conducted by the RM. Finally, general market conditions, client changes to goals and objectives or portfolio needs can trigger a review by the RM any time throughout the year.

For all investment advisory accounts, results for both quarter and year to date, and comparisons to indexes, are submitted to the client within thirty days of the close of a quarter.

Client Referrals and Other Compensation

On occasion, BWM has the opportunity to receive shareholder servicing, 12b-1 and referral fees (together “third-party fees”) from sponsors of mutual funds and/or other investments to be purchased for BWM clients. BWM receipt of any such third party fees shall be to the exclusive benefit of its clients. Braver shall deduct the entire amount of all such third party fees received from BWM investment advisory fee. As such, it is not a fee offset, but a credit reducing the amount of advisory fee that the client pays to BWM for its services. BWM does not benefit in any manner as result of its receipt of any such third party fees. Rather, the benefit of BWM’s efforts accrues exclusively to BWM clients.

For example, if a client’s quarterly advisory fee is \$1,000 per the BWM fee schedule, and BWM receives total third party fees of \$1,000 which is to be applied to 100 clients, the advisory fee that the client pays to BWM is reduced by \$10 to \$990. Thus, the entire benefit accrues exclusively to the client. BWM does not receive any portion of the third party fees. In the event that a client terminates its relationship with BWM prior to BWM receipt of the third party fee, BWM shall remit a check to the client for its pro-rata portion thereof. In the unanticipated event that the third party fee cannot be reasonably apportioned to the applicable clients, BWM shall donate the entire amount thereof to charity. The fact that a product sponsor may pay a third party fee is absolutely immaterial to BWM investment decision making process. However, if, as a result of its due diligence process, BWM determines that the investment best suited for the client does pay a third party fee, BWM believes that it would be contrary to its client’s best interests not to obtain such third party fee for the exclusive purpose of providing the entire benefit thereof to its clients. As such, BWM does not believe that its receipt and remittance of such third party fees presents a conflict of interest. To the contrary, it believes it is in its clients’ best interests.

Any questions regarding third party fees should be directed to BWM’s Chief Compliance Officer.

If a client is introduced to the BWM by either an unaffiliated or an affiliated solicitor, BWM may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the BWM's investment management fee, and shall not result in any additional charge to the client.

If the client is introduced to BWM by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the BWM's written disclosure statement as same is set forth on Part 2 of Form ADV, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between BWM and the solicitor, including the compensation to be received by the solicitor from BWM.

Custody

BWM has custody of approximately 13 client accounts and engages an independent public accounting firm to perform surprise examinations. These accounts, as with all accounts that BWM manages, receive monthly investment reports from qualified independent custodians. BWM urges that all clients review these statements against statements that BWM may provide directly to them.

Investment Discretion

BWM, under contract with the client, receives discretion to manage assets according to the proprietary investment programs agreed upon with the client. The client authorizes BWM to select the securities to be bought or sold and the position sizes within the disciplines and objectives of the investment strategy. The discretion that BWM exercises is restricted to the customized investment plan agreed to by the client and is subject to the investment objectives of the investment strategy that it is managing on the clients' behalf. Clients may impose limitations on this discretion at anytime.

Voting Client Securities

BWM does not vote proxies for individual clients but may vote proxies for institutional clients that require such by law or request us to do so. All clients receive proxies and other solicitations directly from their custodians or transfer agents. Clients may contact us at anytime relative to questions about any solicitations. Currently, BWM votes proxies for one client relationship.

To the extent applicable, BWM is responsible for fair and accurate proxy voting and for ensuring that proxies are voted in a timely manner. At BWM, the RMs oversee the proxy voting process. Our process includes keeping a spreadsheet record of all portfolio holdings, their meeting dates, meeting types and the vote deadlines. The RMs utilize independently conducted research and determine the vote based on objectives for the company and with consideration of the client's goals and objectives. The vote is made in a timely manner and records are kept accordingly.

BWM votes (or refrains from voting) proxies for each issuer in a manner that we, in the exercise of our independent business judgment, conclude are in the best economic interests of our clients. In some cases, BWM may determine that it is in the best economic interests of the client to refrain from exercising the client's proxy voting rights (such as, for example, proxies on certain non-U.S. securities that might impose costly or time-consuming in-person voting requirements).

BWM recognizes that the potential for conflicts of interest could arise in situations where we have discretion to vote client proxies and where BWM has material business relationships or material personal or family relationships. In the event that BWM holds a security issued by a client in client's portfolios and we are required to vote that proxy, this situation may also represent a conflict of interest. The RM uses reasonable efforts to determine whether a potential conflict may exist. The RM decides how to vote the proxy of any security with respect to which BWM has identified a potential conflict. The RM also considers recommendations and makes a decision on how to vote the proxy and documents his/her rationale for his/her decision.

Clients may obtain a copy of our proxy voting policies and procedures upon request.

Financial Information

BWM is a profitable and growing business marked by a sound balance sheet, growing revenues and profitability, and a strong reputation in the marketplace.

Requirements for State-Registered Advisers

Not Applicable.

PRIVACY POLICY

We at BWM value your business and are focused on helping you reach your financial goals. We understand that your privacy is important to you and we are committed to safeguarding client information. Since your privacy is a priority to us, BWM will not share information about you with unaffiliated third parties without your consent, except as explained in our Privacy Policy below.

The Information We Collect About You

You provide personal information to us when you have BWM prepare your tax return, produce a financial or a retirement plan, provide an investment review, analysis, or plan, complete an investment account application, request an investment transaction, or help you with a loan application. This information may include your:

- Name, Address & Telephone Number
- Social Security or Taxpayer Identification Number
- Date of Birth
- Driver's License Number
- Email Address
- Assets and Liabilities
- Income and Expenses
- Net Worth
- Account Information (Account Numbers and Balances)
- Investment Activity

How We Handle Your Personal Information

Upon joining BWM, all employees are informed of the confidential nature of the information to which they have access. All employees are required to sign an employment agreement, which includes a confidentiality clause. Violation of this policy may result in disciplinary action up to and including termination.

We do not sell or give information about current or former clients or their accounts to unaffiliated third parties. Nor do we share such information except when needed to obtain information or complete transactions at your request. We do, however, share our information with other affiliated members of the Braver Group.