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March 21, 2013

**FORM ADV PART 2A.
BROCHURE**

This brochure provides information about the qualifications and business practices of Davidson Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 732-409-1060. 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 Davidson Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Davidson Wealth Management, LLC is 153227.

Davidson Wealth Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2: Material Changes: None.

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Advisory Business

Form ADV Part 2A, Item 4

Davidson Wealth Management, LLC's registration was granted by the U.S. Securities and Exchange Commission on March 22, 2010. Richard Edward Prozzo (CRD Number 1972687) is Managing Member and Chief Compliance Officer of the firm. Mr. Prozzo owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries, which have any ownership interest in the firm. As of December 31, 2012, the firm managed, on a discretionary basis, \$48,496,580 which represented 414 accounts and managed on a nondiscretionary basis \$48,305,072 which represented 192 accounts. Client assets are managed on an individualized basis. Clients may impose restrictions on their accounts. The firm does not sponsor any wrap programs.

Davidson Wealth Management, LLC. (hereafter referred to as the Firm, the Adviser), offers the following investment advisory services:

I. Asset Management

The Firm provides money management to individuals and corporate clients providing professional management of client's funds. The Firm diversifies and manages the client's portfolios which includes but is not limited to stocks, bonds, options, limited partnerships, mutual funds and money market instruments.

Investments are determined based upon the client's investment objectives, risk tolerance, net worth, net income and other various suitability factors.

The Firm manages the client's accounts on an individualized basis. Further restrictions and guidelines imposed by clients affect the composition and performance of portfolios. For these reasons, performance of portfolios within the same investment objective may differ and clients should not expect that the performance of their portfolios will be identical with the average client of the Firm.

Principals of the Firm are Registered Representatives associated with Royal Alliance Associates, Inc. It is suggested for convenience and proper management of the Asset Management account, that the client establishes a brokerage account at Royal Alliance Associates, Inc.

The adviser and its IARs will qualify clients for investment in certain Third-Party Advisory Services which afford the Adviser the limited discretion to manage the Third-Party Advisory Services initial or subsequent investment recommendations

To assist the client in the selection of a Third Party Advisory Service, IARs will typically gather information from the clients about the client's financial situation, investment objectives, and reasonable restrictions the clients wants imposed on the management of the account. The Adviser will not offer advice on any specific securities or other investments in connection with this service.

The IARs on behalf of their Adviser will periodically review reports provided to the clients. The IARs on behalf of their Adviser will contact the client periodically, as agreed to with the clients, to review the client's financial situation and objectives; communicate information to the Third Party Advisory Service managing the account as warranted; and, assist the clients in understanding and evaluating the services provided by the Third Party Advisory Service. Clients will be expected to notify their IAR of any changes in their financial situation, investment objectives, or account restrictions. Clients may also contact directly the Third Party Adviser managing the account or sponsoring the program.

The Adviser receives compensation pursuant to its agreements with these Third Party Advisory Programs for introducing clients to these Third Party Advisory Programs and for certain ongoing services provided to clients. This compensation, which is disclosed to the client in a separate disclosure document provided by the Third Party Advisory Program, is typically equal to a percentage of the investment advisory fee charged by that Third Party Advisory Program or a fixed fee.

Due to the fact that the Adviser receives compensation from the Third Party Advisory Services for referring clients and because such compensation may differ depending upon the individual agreement with each Third Party Advisory Service, the Adviser may have an incentive to recommend one of these Third Party Advisory Services over others with which it has less favorable compensation arrangements or other advisory programs offered by Third Party Advisory Services with which it has no compensation arrangements.

A complete description of the programs and services available through the Third Party Advisory Services will be provided to the client upon receipt and review of the applicable Third Party Advisory Service's Form ADV Part 2A. Disclosure Brochures and/or equivalent brochures; investment advisory contracts; and account opening documents. Clients will sign an advisory agreement with the Adviser and will also sign an advisory agreement directly with the Third Party Advisory Service selected.

The SEI Asset Management Program is a program whereby the Adviser can make the SEI family of mutual funds available to its clients. SEI is not an investment adviser in this instance and does not have the investment adviser relationship with the client. The adviser will assist the client in selecting a relevant asset allocation model. The client chooses one of several mutual fund asset allocation models. If the client so chooses, automatic re-balancing to the model allocation and recommended model allocation changes will not be available.

GoalLink - Integrated Managed Account Program

The advisor participates in the GoalLink program. The advisor offers the GoalLink program to high net worth individuals, trusts, endowments, foundations and institutions. Through the GoalLink program, advisor serves as the primary investor contact, responsible for analyzing the investor's current financial situation, return expectations, risk tolerance, time horizon, and asset class preference. Using the GoalLink presentation tool, the advisor and the investor select an investment strategy which is then submitted and reviewed by a representative of SEI Investment Management Corporation ("SIMC"). The strategy may include a combination of individual securities and mutual funds advised by SIMC ("SEI Funds") based upon the investor's selected strategy and account size.

To participate in the program, the Adviser, SIMC, and individual investors execute a tri-party agreement ("Agreement") providing for the management of certain investor assets in accordance with the terms thereof. Pursuant to the agreement, the investor appoints the Adviser as its investment advisor to assist the investor in selecting the strategy. Based upon the selected strategy, SIMC will have investment authority of the assets and will make prescribed adjustments to the strategy weights based on the market environment at a point in time. However, the investor may, at any time, impose reasonable restrictions on the management of the investor's account or choose a new strategy. SIMC's investment authority is effective until changed or revoked in writing. SIMC may delegate its day-to-day responsibility for selecting particular securities to one or more sub-advisors.

The SEI Funds expenses are found in the funds' prospectus, which should be read carefully by all investors before investing. For SIMC's fees on assets held in the separate accounts, the fees are determined based on the asset classes incorporated in the investor's account. The following sets forth the fees charged by SIMC for each specific strategy managed by the Goal Link program.

The advisor participates in the SEI asset allocation program, which is offered to high net worth individuals, defined benefit plans, participant and non-participant directed defined contribution plans, institutions, endowments, and foundations.

With the SEI asset allocation program, the Adviser serves as the investment advisor to the investor, and is responsible for analyzing the investor's current financial situation, return expectations, risk tolerance, time horizon, and asset class preference, pursuant to the advisor's investment advisory agreement. Based upon the investor's information, the advisor and the investor select an investment strategy and choose from one of many mutual fund allocation models, which may be provided by SEI Investment Management Corporation ("SIMC"), or purchase the individual mutual funds.

The advisor will allocate the assets placed in the investor's account among the SEI Funds (a family of mutual funds advised by SIMC) in accordance with the investment strategy or model selected by the investor. The investor, through an advisor, may make adjustments to their asset allocation to help ensure that the mix reflects the objectives of the chosen strategy. The investor may, at any time, impose reasonable restrictions on the management of his/her account or choose a new investment strategy. For participant directed plans, assets will be invested in the SEI asset allocation mutual funds and other style specific SEI funds (if applicable).

In accordance with the client's invested objectives, the advisor may also allocate assets placed in the investor's account among the SEI funds through SEI's private client models, which reflect SIMC's institutional asset allocation models more aligned with individual investor's goals. SIMC expects to make changes to the private client model periodically to incorporate changes to the mutual fund asset allocation underlying the models. Upon consent from the advisor (utilizing limited discretion), these asset allocation changes will be made to the client account invested in the private client models.

Davidson Wealth Management, LLC (the "Advisor") has entered into an introducing arrangement with SEI Investments Management Corporation "(SIMC)" who will pay the advisor an introduction fee (which may be a portion of the fee paid to SIMC by the referred client for introducing prospective clients to the SEI Wealth Network and Global Institutions Group as defined below. The payment for any introduction fee by SIMC to advisor will not result in an increase in fees to the specific client. Where required by federal or state law, each introducing arrangement will be governed by a written agreement between the advisor and SIMC that complies with SEC rules to 206 (4)-3 of the Investment Advisors Act of 1940. In particular, referred clients will be provided with copies of Part 2 of SIMC's Form ADV, separate disclosure of the nature of the introducing or referral arrangement (including compensation features) applicable to the client being referred, and any other document required to be provided under applicable state law, and advisor and SIMC shall obtain written approval of the client arrangement.

SEI Wealth Network: SIMC offers its clients either directly or in conjunction with affiliated entities a variety of advisory and financial administration services through the SEI wealth network (the program). The program features a life-goals-based wealth advice process that includes financial administration and management, and a full range of implementations and programs in the area of investment advice and portfolio management, securities, administrative services, insurance, credit, trust and estate planning services, philanthropy, long-term care planning services and other related services provided or procured through SIMC, its affiliates and/or third parties.

Global Institutions Group: SIMC provides asset management services for various types of sophisticated institutional investors, including traditional corporate pension plans, Taft-Hartley benefit plans, funded welfare plans (i.e., VEBAs), charitable foundations, endowment funds, pooled giving funds and other general organizational investment accounts.

In addition to the aforementioned investment advisory products and services, the Adviser also offers its clients the Managed Assets Program (the “Program”).

The Program is a comprehensive, personal investment management program, which provides clients with access to multiple managers who will provide investment advice to client portfolios consisting of individual stocks and bonds as well as mutual funds.

Clients can choose a complete asset allocation strategy to seek an investment manager for a single asset class. Individual stock and bond portfolios can be complemented by research-screened mutual funds.

The Program is sponsored by Royal Alliance Associates, Inc. As sponsor of the Program, Royal Alliance has created a *Program Brochure* which will be distributed to the Adviser’s clients before or concurrent with their engagement in the Program. Clients should read it thoroughly before investing.

Third Party Advisory Services

The firm offers its clients the services of various third party investment advisors (“Third-Party Advisory Services”) for the provision of certain investment advisory programs. If you are interested in learning more about any of these services, please note that a complete description of the programs, services, payment structure, and termination features is available via the applicable Third Party Advisory Service’s disclosure brochures, investment advisory contracts, and account opening documents.

Please further note that when investing in mutual funds and variable annuities, clients are strongly encouraged to review the applicable prospectuses. Mutual funds and variable annuities may impose certain restrictions on the frequency, timing and dollar amount of transactions and may impose penalty fees based upon short-term trading patterns. Such restrictions may impact the services provided by Third-Party Advisory Services.

Advisory Services Provided by the firm in Connection with Third Party Advisory Services. In connection with these arrangements, the firm provides services to their clients through assistance in the selection and ongoing monitoring of a particular Third-Party Advisory Service. Factors considered in the selection of a particular third-party advisor may include but may not be limited to: i) the firm's assessment of a particular Third-Party Advisory Service; ii) the client's risk tolerance, goals, objectives and restrictions, as well as investment experience; and, iii) the size of client assets available for investment.

The services provided by Third-Party Advisory Services are under certain conditions available directly to investors from those Third Parties. The fees charged by Third-Party Advisory Services to clients who contract directly for their services may be more or less than the combined fees charged by the Third Party Advisory Service and the firm for participation in investment programs. However, clients using the services of Third-Party Advisory Services directly would not receive the firm's assistance in developing an investment strategy, selecting a Third-Party Advisory Service, monitoring performance of the account, and changing a Third-Party Advisory Service provider when appropriate.

All securities transactions are decided upon and executed by the Third-Party Advisor. Each Third-Party Advisor maintains its own separate execution, clearing, and custodial relationships.

II. Financial Planning Services

The Firm offers comprehensive financial planning, providing analysis and recommendations in the areas of retirement planning, business planning, children's education, life and health insurance, estate planning, tax planning, as well as investment advice for individuals and small businesses.

III. Other Services

There is an alternative approach made available by Firm to certain clients who are able to meet the minimum and who wish to have nationally known, top money managers manage the client's stock portfolio.

Fees and Compensation

Form ADV Part 2A, Item 5

The following indicates the charges for Asset Management Services:

Asset Management Program—Fee Schedule

Portfolio Value	Advisory Fee
\$0 - \$999,999	1.75%
\$1,000,000 - \$2,999,999	1.25%
\$3,000,000 - \$4,999,999	1.00%
Greater than \$5,000,000	.75%

Fees are paid after each quarter. The management account does not require a minimum to be invested. Client may terminate within 5 business days without penalty.

The following indicates the charges for third party management services with SEI

The fees payable to SIMC for Large Cap Core/Tax Strategy:

0.85% for the first \$1 million.
0.80% for the next \$2 million.
0.75% for the next \$2 million.
Negotiable for above \$5 million.

The fees payable to SIMC for US Large Cap Core Strategy:

0.9% for the first \$3 million.
0.85% for the next \$2 million.
Negotiable for above \$5 million.

The fees payable to SIMC for US Large Cap Growth Strategy:

0.90% for the first 3 million.
0.85% for the next 2 million.
Negotiable for above \$5 million.

The fees payable to SIMC for US Large Cap Value Strategy:

0.90 for the first \$3 million.
0.85% for the next \$2 million.
Negotiable for above \$5 million.

The fees payable to SIMC for Managed Volatility/Tax Sensitive Managed Volatility:

0.90% for the first \$3M.
0.85% for the next \$2M.
Negotiable for above \$5M.

The fees payable to SIMC for US Mid-Cap Strategy:

1.10% for the first \$1M.
1.00% for the next \$2M.
0.90% for the next \$2M
Negotiable for above \$5M.

The fees payable to SIMC for US Small-Cap Strategy:

1.20% for the first \$1M.
1.10% for the next \$2M.
1.00% for the next \$2M.
Negotiable for above \$5M.

The fees payable to SIMC for International Equity Strategy:

1.20% for the first \$1M.
1.10% for the next \$2M.
1.00% for the next \$2M.
Negotiable for above \$5M.

The fees payable to SIMC for Active Municipal Bond Strategy:

0.70% for the first \$1M.
0.65% for the next \$2M.
0.60% for the next \$2M.
Negotiable for above \$5M.

The fees payable to SIMC for Core Fixed Income Strategy:

0.70% for the first \$1M.
0.65% for the next \$2M.
0.60% for the next \$2M
Negotiable for above \$5M.

The fees payable to SIMC for Laddered Municipal Bond Portfolio:

0.30% for the first \$5M.

Negotiable for above \$5M.

The fees payable to SIMC for Time Focused Fixed Income Strategy:

0.30% for the first \$5M.

Negotiable for above \$5M.

The fees payable to the Adviser are as follows:

Portfolio Value	Advisory Fee
\$0 - \$999,999	1.75%
\$1,000,000 - \$2,999,999	1.25%
\$3,000,000 - \$4,999,999	1.00%
Greater than \$5,000,000	.75%

The fees charged by the Advisor may be discounted.

Additionally, the GoalLink program offers a feature called Integrated Managed Accounts ("IMAP"), which is an enhancement to the standard Goal Link program as described above. The fee for IMAP covers the integration of the equity managers, which helps result in increased coordination across the equity account, increased tax efficiency, and additional features such as washed sales prevention.

The fees payable to SIMC for the IMAP feature are up to 0.10% of the total account value (excluding zero coupon assets managed by SIMC).

Under the GoalLink program, the investor receives investment advisory services, the execution of security, brokerage transactions, custody services and reporting services for a single specified fee. Participating in the goal link program may cost the participant more or less than purchasing such services separately. In addition, the goal link program may be higher or lower than that charged by other sponsors of comparable Wrap fee programs.

SIMC's fees shall be a percentage of the market value of the clients' account assets held in the strategy. The fees shall be calculated and payable quarterly in arrears and net of any income, withholding, or other taxes.

The fees payable to SIMC for the private client models are as follows:

	Taxable	Tax exempt
Aggressive.	1.00%	1.14%

Market Growth.	0.90%	1.01%
Core Market.	0.80%	0.89%
Moderate.	0.84%	0.86%
Conservative.	0.79%	0.82%
Defensive.	0.70%	0.72%

The SEI funds are administered, distributed, and in some cases advised by SIMC or its affiliates for which it is paid fees as disclosed in the SEI funds prospectus' theory. The prospectuses should be read carefully by all investors before investing in the SEI funds.

The advisor's fees are as follows:

Portfolio Value	Advisory Fee
\$0 - \$999,999	1.75%
\$1,000,000 - \$2,999,999	1.25%
\$3,000,000 - \$4,999,999	1.00%
Greater than \$5,000,000	.75%

The fees charged by the Advisor may be discounted.

SEI Trust Company will debit the investor's account on a quarterly basis for the above mentioned fees and charges. The charges to the account will be on an arrears basis and will be remitted quarterly net of any applicable account and performance reporting charges not charged to the customer. Upon written notification, the agreement may be terminated by either the Adviser or the investor. Prorated fees will be charged based on the market value on the date notice is received.

Adviser charges an advisory fee. SIMC charges an expense ratio to the fund; all expense ratios are disclosed in the prospectuses of the funds. SEI Trust Company, a subsidiary of SEI Investments Co. acts as the transfer agent and custodian for the client's account. The advisory fee is debited from the customer account by SEI Trust Company on behalf of the customer and Adviser. SEI does not participate in the advisory fee. SEI Trust Company then forwards the fee to Royal Alliance as paying agent for Adviser. Royal Alliance deducts its processing fee and forwards the advisory fee to Adviser.

In relation to financial planning fees, One-half of the estimated fee is due when the client provides the data and executes a contract and the balance is due when a written financial plan is presented. The client may reject the plan at the time of presentation and receive a refund of the deposit. When the plan is accepted, the client is requested to pay the balance due. Flat fees may be negotiated for consultation or individual reports.

The Firm generally provides investment advice on equity securities, debt securities, life insurance, variable and fixed annuities, mutual fund shares, and limited partnerships. Financial plans may be executed through Royal Alliance Associates, Inc. In this capacity the Firm's registered representatives may earn a commission in addition to any fees paid for the financial plan. The Firm

does not take custody of client funds or securities.

There is an alternative approach made available by Firm to certain clients who are able to in relation to the Managed Assets Program, clients pay a quarterly *Account Fee*, in advance, based upon the market value of the Program assets as of the last business day of the preceding calendar quarter. In computing the market value of assets, Fund shares will be calculated at their respective net asset values as of the valuation date in accordance with each Fund prospectus. Any such valuation shall not be deemed a guarantee of any kind with respect to the value of those assets. If additions to, or withdrawals from, the account are made during any given quarter, the applicable *Account Fee* will be adjusted on a pro-rata basis, based on the market value of the assets at such time to reflect the addition or withdrawal.

Account fees will range to a maximum 2.75% of account assets, based on the size of the clients' assets invested in the Program. The complete schedule of *Account Fees* are set forth in the *Program Brochure* distributed by Royal Alliance and provided by the Adviser before or concurrent with engagement of the Adviser's clients in the program.

Compensation in connection with Third-Party Advisory Services generally consists of five elements: i) management and advisory fees shared by Third-Party Advisory Services, the firm, and its Investment Advisory Representatives; ii) transaction costs – if applicable – which may be paid to purchase and sell such securities; iii) custody fees; iv) revenue sharing compensation paid to Royal Alliance Associates, Inc. ("Royal Alliance") the securities broker-dealer to which members of the firm are associated with; and v) fees paid to Royal Alliance for administrative and supervisory services. In connection with some Third Party Advisory Services, fees for investment advisory services and brokerage execution are wrapped together as a single fee.

Please note that a complete description of the fees and charges associated with any of these arrangements is available via the applicable Third Party Advisory Service's disclosure brochures, investment advisory contracts, and account opening documents.

The firm's portion of the management and advisory fees referenced above may be negotiated based on assets under management, the type of services requested and other factors that the firm deems relevant to its provision of the advisory services related to the program, however clients should be aware that Third-Party Advisory Services may not be willing to negotiate their share of referenced fees, and the firm is not authorized to negotiate a Third-Party Advisor's Fees.

Fixed Annuities

In certain cases, fixed annuities are sold as part of the asset management program. The client's negotiated management fee will be charged.

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Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

None.

Types of Clients

Form ADV Part 2A, Item 7

Individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Methods of securities analysis is fundamental analysis, charting and technical analysis.

Investment strategies are long term purchases (securities held for at least one year), short term purchases (securities held less than one year) and trading (securities sold within 30 days).

Disciplinary Information

Form ADV Part 2A, Item 9

None.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Principals and associated persons of Davidson Wealth Management, LLC are Registered Representatives associated with Royal Alliance Associates, Inc., Member of AIG Advisor Group. Securities transactions purchased or sold by the customer may be transacted through the Broker/Dealer. The Firm may recommend securities or insurance products offered by AIG Advisor Group or its affiliates. If a client purchases these products through the representative, the representative will receive the normal commission. Thus a conflict exists between our interests and those of the advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through the Firm or Royal Alliance Associates, Inc.

As disclosed in this Narrative, Davidson Wealth Management, LLC (or affiliated persons of Davidson Wealth Management) are registered securities representatives of Royal Alliance Associates, Inc. ("Royal") a broker dealer and member of the Financial Industry Regulatory Authority ("FINRA"). Under the rules and regulations of FINRA, Royal has obligations to maintain records and perform other functions regarding certain aspects of the investment advisory activities of its registered representatives in relation to certain advisory accounts for which its registered representatives provide investment advice. These obligations require Royal to coordinate with, and have the cooperation of, the account custodian. To fulfill its obligation, Royal has established a list of custodian and brokerage firms which it has arranged to obtain the required cooperation, and which therefore may be utilized for custody of accounts directly advised either by registered representatives of Royal who are investment advisers or other investment advisor entities which are affiliated with registered representatives of Royal. In certain instances, Royal will collect as paying agent for Davidson Wealth Management, the investment advisory fee remitted to Davidson Wealth Management by the account custodian, and Royal will retain a portion as a charge to the investment advisor (not the client) for the functions Royal is required to carry out by the FINRA. This fee will not increase execution or brokerage charges to the client or the fee the client has agreed to pay Davidson Wealth Management pursuant to the client's advisory agreement. A portion of the fee retained by Royal may be re-allowed to other registered representatives of Royal who, as registered representatives of Royal, are responsible for the supervision of other representatives and assist Royal with the functions described above.

Associated persons accept compensation for the sale of securities or other investment and/or insurance products, including asset-based sales charges or service fees from the sale of mutual funds. 1. This practice presents a conflict of interest and gives us an incentive to recommend investment products based on the compensation received, rather than on a client's needs. This creates a conflict of interest. The firm will recommend no-load mutual funds in certain circumstances 2. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with us. 3. The firm charges advisory fees and the investment advisory representatives may receive commission income as a result of product sales. Advisory fees are not off-set by commission income.

Davidson Wealth Management, LLC has a material relationship with Next Generation Wealth Planning, LLC, CRD Number 141615, Yale J. Levey, Managing Member and Chief Compliance Officer.

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

Form ADV Part 2A, Item 11

The firm has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. The Code of Ethics sets forth standards of conduct and requires compliance with various federal securities laws. Our Code of Ethics also addresses personal trading and requires our personnel to report their personal securities holdings and transactions to Richard Prozzo, the Chief Compliance Officer of the firm. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

It is further noted that Firm is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm has adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons and other employees. This statement has been distributed to all associated persons and other employees of Firm and has been signed and dated by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of Firm, are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which Firm's employees may have non-public information, (4) requiring all of Firm's employees to conduct their trading through a specified broker or reporting all transactions promptly to Firm, and (5) monitoring the securities trading of the firm and its employees and associated persons.

Firm or individuals associated with Firm may buy or sell securities identical to those recommended to customers for their personal account.

It is the expressed policy of Firm that no person employed by Firm may purchase or sell any security before a transaction(s) being implemented for an advisory account, therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

Firm or any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations may represent a conflict of interest, Firm has established the following restrictions to ensure its fiduciary responsibilities:

- 1) A director, officer or employee of Firm shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Firm shall prefer his or her own interest to that of the advisory client.
- 2) Firm maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. These holdings are reviewed on a regular basis by Mr. Richard Prozzo, President and Chief Compliance Officer.
- 3) Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- 4) Any individual not in observance of the above may be subject to termination.

Brokerage Practices

Form ADV Part 2A, Item 12

In the capacity as a Royal registered representative, an associated person of Davidson Wealth Management, LLC may suggest that clients execute securities transactions through Royal. If clients freely choose to execute such transactions through Royal, the associated persons of Firm may receive the normal commissions and/or other compensation. Firm may recommend to clients the purchase of investment products in which it or a related entity may have some financial interest, including the receipt of compensation. Certain mutual funds (and/or their related persons) in which a client may invest make payments to broker-dealers. Such payments may be distributed pursuant to a 12b-1 distribution plan or pursuant to another arrangement as compensation for distribution or administrative services and may be paid out of the fund's assets. Associated persons of Davidson Wealth Management in their capacity as registered representatives of Royal may receive such fees or other compensation to the extent permitted by applicable law. A fund that imposes a front-end sales load but which waives that front-end sales load for purchases made on behalf of the client's account (a "front-end load" fund at net asset value) may bear 12b-1 distribution or service fees in excess of .25% of a client account's net assets invested in such fund (the maximum allowed for no-load funds). The 12b-1 fee, deferred sales charges and other fee arrangements will be disclosed upon request of the client and are typically described in the applicable fund's prospectus. Because of these compensation arrangements, a conflict of interest exists in connection with the recommendation of particular mutual fund investments for a client's account.

No-load mutual funds will be purchased through the facilities of Schwab Institutional and Royal Alliance. There are transaction charges involved when purchasing the funds and the client will be notified of all charges before the execution of any trade. Associated persons of Firm are registered representatives of Royal and may suggest that clients execute transactions through Royal. If clients freely choose to execute transactions through Royal, these associated persons may receive normal commissions and/or other compensation.

Review of Accounts

Form ADV Part 2A, Item 13

Reviews are done at various intervals depending on client needs which will be done in person or via telephone.

Current reports can be generated at any time at the request of the advisory client.

The firm may periodically review reports provided to the client. As needed, but no less than annually, the firm contacts clients and reviews client's financial situation, objectives, and restrictions and communicates information to the Third-Party Advisory Service; and may assist the client in understanding and evaluating the services provided by the Third-Party Advisory Service.

Account Statements. Clients receive an account statement from their custodian at least quarterly, which includes the amount of any fees paid directly to such Third-Party Advisory Service, or any other advisor selected by the client to manage the account.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Firm may employ the services of paid solicitors in certain cases. Full compliance with Regulation Section 275.206-4-3(b) shall be maintained at all times.

Custody

Form ADV Part 2A, Item 15

None.

Investment Discretion

Form ADV Part 2A, Item 16

Davidson Wealth Management, LLC shall not have discretion in placing brokerage orders on behalf of the client. Davidson Wealth Management, LLC shall exercise only limited trading authorization with power of attorney in managing the Property. Any Limited Trading Authorization(s) of any brokerage firm signed by client and Davidson Wealth Management, LLC shall be considered an integral part of its contractual obligations. The limited trading authority relates only to no-load mutual funds, within a fund family or in the separate account of a variable annuity.

Voting Client Securities

Form ADV Part 2A, Item 17

Under no circumstances shall Davidson Wealth Management, LLC vote any proxy statements on behalf of any advisory client.

Financial Information

Form ADV Part 2A, Item 18

Firm does not receive fees more than six months in advance.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Not applicable.

Additional Information

None.