

Form ADV Part 2A: Firm Brochure

Item 1 – Cover Page

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Date of Disclosure Brochure: December 2014

This disclosure brochure provides information about the qualifications and business practices of Anchin Wealth Management, LLC (also referred to as we, us and Anchin throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact us at 212-840-3456. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Anchin is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Anchin Wealth Management, LLC or our firm's CRD number 111229.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

Since filing our last annual amendment in January 2014, we have moved all accounts to third-party money manager platforms. We therefore do not technically have regulatory assets under management and have updated Item 4 of this brochure.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. At that time we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

Anchin Wealth Management, LLC (“Anchin”) is a New York limited liability company that was formed on April 17, 2000, and registered as an investment adviser with the U.S. Securities Exchange Commission on May 4, 2001. It then commenced business shortly thereafter. The principal owner of Anchin is ABA Platinum Group LLC, which is in turn owned by Anchin, Block & Anchin LLP, a certified public accounting firm.

Description of Advisory Services

Referrals to Third-Party Money Managers - Anchin offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, we are paid a portion of the fee charged and collected by the third-party money managers in the form of solicitor fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

For most situations, you can contact the third-party money manager directly for questions related to your accounts. However, we are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager will typically take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms that have agreed to pay us a portion of the overall fee charged to our clients. Therefore, Anchin has a conflict of interest in that it will only recommend third-party investment advisors that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that may be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm.

Sub-Advisor Asset Allocation and Investment Management Service - We have developed this program as a service designed to diversify your assets among one or more unaffiliated, third-party money managers that serve as Sub-Advisors on your account. We construct Sub-Advisor portfolios and select appropriate Sub-Advisors for you based upon your individual needs. Selected Sub-Advisors then manage your assets by providing ongoing discretionary investment management services. Discretionary authority allows the Sub-Advisors to determine the securities to be purchased and sold in your accounts managed by the Sub-Advisors. We will **not** have any trading authority with respect to your accounts managed by a Sub-Advisor. Prior to recommending and selecting a Sub-Advisor for a client, we may discuss the Sub-Advisors with you. However, our program permits us to hire and fire Sub-Advisors on your behalf without directly consulting with you. Please refer to Item 16 – Investment Discretion for more information.

We will need to obtain certain information from you to determine your financial situation and investment objectives. It is important that all information you provide be accurate, complete and up-to-date. However, we cannot assume responsibility for the accuracy of information furnished by you or any third-party on your behalf.

At least quarterly, you are reminded to notify us whether your financial situation or investment objectives have changed, or if you want to impose and/or modify any reasonable restrictions on the management of your accounts. At least annually, we contact individual clients to determine whether their financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of accounts managed. We are always reasonably available to consult with individual clients relative to the status of their accounts and to facilitate communication with selected money managers. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to restrict certain securities. Your 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 account. A separate account is always maintained for each client with the custodian and clients retain right of ownership of the account (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

It is important that you understand we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions we take for you.

Conflicts may arise in the allocation of investment opportunities among accounts managed by third-party money managers. Steps are always taken to allocate investment opportunities believed appropriate for your account(s) and other accounts advised by our Firm and outside money managers among such accounts equitably and consistent with the best interests of all accounts. However, there can be no assurance that a particular investment opportunity that comes to our attention or the attention of a money manager will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

Specialization

Anchin specializes in providing helping clients select investment strategies developed and managed by independent, third party investment adviser firms.

Limits Advice to Certain Types of Investments

Although Anchin does not manage client accounts and therefore is not solely responsible for selecting investments held in client accounts, Anchin will consult with clients and answer questions regarding the types of investments selected by Third-Party Money Managers and Sub-Advisors that are held in client accounts. Such investments may include:

- No-load or load-waived mutual funds;
- Exchange-traded funds ("ETFs"); and
- Limited partnerships or other alternative investment vehicles.
- Equity Securities - including foreign issuers;
- Warrants;
- Corporate Debt Securities - including Bonds and Commercial Paper;
- Certificates of Deposit;
- Municipal Securities;

- Investment Company Securities - Mutual Fund Shares (excluding insurance products);
- U.S. Government Securities;
- Options on securities (excluding commodities);
- Distressed Securities; and
- Private investment partnerships, venture capital funds and other alternative investments.

Tailor Advisory Services to Individual Needs of Clients

Clients may impose restrictions on the types of investments, including (i) the types of securities Anchin may invest in for such client's accounts and (ii) limitations on the amount or percentage of assets that may be invested in a particular asset class or type of investment. You may impose these restrictions when the investment adviser and client relationship is established.

Wrap Fee Programs

Anchin does not participate in wrap fee programs.

Client Assets Managed by Anchin

As of December 2014, all client accounts are managed by third-party money managers and Anchin does not technically manage client accounts.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Anchin.

Referrals to Third-Party Money Managers - Third-party money managers recommend by Anchin generally have different fee schedules that will vary among the different firms. If you choose to engage a firm we recommend, you will speak with that firm to determine the fees they charge to provide advisory services. Anchin will not charge or assess an advisory fee directly to you. However, we will receive a solicitor or referral fee from the third-party money manager. Specifically, we will receive a portion of the overall fee charged by the third-party money manager. Most investment advisory firms charge a fee based on the percentage of assets under management. Anchin may receive up to 35% of the management fee charged to you. For example, if the third-party investment advisory firm charges a fee of 1.25% of the fees under management, we will receive no more than 0.44% of that fee.

All fees are calculated and collected by the third-party money manager who will be responsible for delivering our portion of the fee paid by you to Anchin. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established. You will also receive a Solicitor Disclosure Statement from Anchin which details the exact fee arrangement between Anchin and the third-party money manager.

Please note that you may incur charges in addition to the fees assessed by third-party investment advisory firms including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees.

Sub-Advisor Asset Allocation and Investment Management Service - Clients receiving these services pay management fees to both Anchin and to any Sub-Advisor (for that part of the Client's account managed by the Sub-Advisor) that provides investment advisory services to the Clients. Anchin's management fees are due quarterly and are paid in advance.

Clients pay Anchin a quarterly fee in advance according to the schedule provided below. The quarterly fee is calculated as a percentage of assets under management (based on a market value or fair market value in the absence of market value) valued at the end of the previous calendar quarter. Anchin's quarterly fee is not charged on the basis of an increase the value of the funds or any portion of the funds of a client during the relevant quarter.

Anchin's Fee Based on Assets Under Management are as follows:

- First \$3 million: 0.25% quarterly, approximately 1.00% per year,
- On the Next \$2 million: 0.1875% quarterly, approximately 0.75% per year,
- On the Next \$25 Million : 0.13% quarterly, approximately 0.50% per year, and
- \$30 million or more: 0.10% quarterly, approximately 0.40% per year.

The preceding fee schedule represents the maximum fees assessed. Under certain circumstances, Anchin may, in its sole discretion, negotiate a lower annual fee for providing the same service to different clients. Anchin may also charge a flat percentage rate on all assets managed rather than a tiered or blended rate. For example, some clients are assessed an annual fee of 0.65% or 0.16% quarterly on all assets. Negotiating factors include the amount of assets under management, the complexity of the client's situation and sub-advisers utilized.

Anchin's fees are deducted directly from your account and paid to our firm by the qualified custodian of your account. Therefore, you must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Anchin. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Anchin's annual fee does not include the fees of:

- Selected Sub-Advisors;
- Management fees, loads or distribution fees of money market or mutual funds;
- Management fees, loads or distribution fees of ETFs;
- Management and performance fees of any alternative investments (e.g., hedge funds, private equity funds or venture capital funds, etc.); or
- Any brokerage commissions or custodial fees (and any other third-party expenses).

Sub-Advisors provide clients with the details of their fees for providing investment advisory services to the client's account, as well as, the details for each of the types of investments listed above. Clients should carefully review the fees charged by Anchin, any Selected Sub-Advisors, as well as, the fees for any investments (e.g., money market funds, mutual funds, ETFs, limited partnerships, etc.) to understand the total fees charged to the Client's account.

If the client agreement is terminated, the management fee paid to Anchin will be pro-rated and charged for that quarter only up to the date of termination. Any unearned fees will be returned to the Client's account.

Neither Anchin nor its supervised persons accept compensation for the sale of securities or other investment products.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. Item 6 is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Anchin works exclusively with high net worth individuals. High net worth individuals are defined as those with more than \$1,000,000 under management with Anchin or \$2,000,000 net worth.

Minimum Investment Amounts Required

There are no minimum investment amounts or conditions required for establishing an account managed by Anchin. However, all clients are required to execute an agreement for services in order to establish a client arrangement with Anchin and/or the third-party money manager or the sponsor of third-party money manager platforms.

Third-party money managers may have minimum account and minimum fee requirements in order to participate in their programs. Each-third party money manager will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

Specific to our Third-Party Money Manager Program, we do not utilize specific methods of analysis or strategies. Methods of analysis and investment strategies used to manage your accounts are determined and implemented by third-party money managers. However, we are available to help explain such strategies and may offer analysis of specific investments and securities held in your account.

For our Sub-Advisor Asset Allocation and Investment Management services, Anchin allocates portions of client accounts to the recommended Sub-Advisors who are responsible for the management of client assets allocated by Anchin. Anchin uses Fortigent, an unaffiliated research provider, which provides research regarding the investment performance of various investment managers for alternative investments, equity securities and bonds and the investment returns of ETFs and mutual funds. Anchin will select Sub-Advisors for clients' separately managed account from the list of investment managers generated from Fortigent's research. Anchin will also choose the asset allocations for client accounts based on Fortigent's research. Anchin's recommendations for Sub-Advisors and asset allocations are designed to meet each client's specific needs, investment goals, restrictions (if any), and tolerance for risk.

Clients using Sub-Advisors recommended by Anchin should review the disclosure documents of these managers for information on the methods of analysis, sources of information and investment strategies used by these managers.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Stock Market Risk** - A Client's investment in securities and other investments may be affected by general economic conditions such as prevailing economic growth, inflation and interest rates. When economic growth slows, or interest or inflation rates increase, equity securities tend to decline in value.

Such events could also cause companies to decrease the dividends they pay. If these events were to occur, the total return earned on and the value of a Client's investment could decline.

- **Equity, Convertible and Preferred Securities** - Investments may include long and short positions in common stocks, preferred stocks and convertible securities of U.S. and foreign issuers, as well as, depositary receipts for foreign securities. Equity securities fluctuate in value, often based on factors unrelated to the value of the issuer of the securities. The market price of equity securities may be affected by general economic and market conditions, such as a broad decline in stock market prices, or by conditions affecting specific issuers, such as change in earnings forecasts. Depending on the relationship of the conversion price to the market value of the underlying securities or other factors, convertible securities and preferred shares may trade like equity securities. Moreover, Anchin may select investments in equity, convertible and preferred securities without restriction as to market capitalization, including securities issued by smaller capitalization companies, including micro-cap companies.
- **Debt Securities, "High Yield" or "Junk" Debt Securities** - Investments may include without limitation, bonds, notes and other debt securities or related derivatives issued by corporate entities, and in debt that may be below "investment grade" or non-investment grade, including "high-yield" or "junk" debt securities. These securities may pay fixed, variable or floating rates of interest, and may include zero coupon and PIK (i.e., payment in kind) obligations. These securities are subject to the risk of the issuer's inability to meet principal and interest payments on its obligations (i.e., credit risk) and are subject to the risk of price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness or financial condition of the issuer and general market liquidity (i.e., market risk). Additionally, the market values of lower rated debt securities tend to be more sensitive to market risk and credit risk than do higher rated debt securities. Companies that issue such securities often are highly leveraged and may not

have available to them more traditional methods of financing. Non-investment grade debt securities in the lowest rating categories may involve a substantial risk of default or may be in default. An economic recession could severely disrupt the market for non-investment grade securities and may have an adverse impact on the value of such securities. It is likely that any such economic downturn could adversely affect the ability of the issuers of such securities to repay principal and pay interest thereon and increase the incidence of default for such securities. Anchin may not foresee these adverse situations in time to sell a Client's interest, resulting in the Client losing part or all of its investment.

- ***Restricted and Illiquid Investments*** - Investments may include restricted securities and other investments that are illiquid. Restricted securities are securities that may not be sold to the public without an effective registration statement under the U.S. Securities Act of 1933, as amended (the "Securities Act"), or, if they are unregistered, may be sold only in a privately negotiated transaction or pursuant to an exemption from registration under the Securities Act.

Where registration is required to sell a security, the Client may be obligated to pay all or part of the registration expenses, and a considerable period may elapse between the decision to sell and the time the Client may be permitted to sell a security under an effective registration statement. Anchin may be unable to sell the restricted and other illiquid securities purchased for the Client at the most opportune times as Anchin is not likely to be able to force an issuer of restricted or illiquid securities to register those securities.

- ***Private Equity Funds, Venture Capital Funds and Other Pooled Investment Vehicles ("Pooled Investment Vehicles")*** - Investments may include Pooled Investment Vehicles. Pooled Investment Vehicles incur obligations to pay the costs for portfolio transactions and positions; operating expenses, including legal, accounting, auditing and custodial expenses and fees; the costs of the offering; the management fee; the administrator's fee; expenses the investment manager advances or incurs on the Pooled Investment Vehicle's behalf; and any extraordinary expenses. All of these costs, expenses and fees will be payable regardless of whether the Pooled Investment Vehicle realizes any profits. Therefore, such costs lower a Client's investment performance.

Generally, an investment manager of a Pooled Investment Vehicle may suspend withdrawals or defer withdrawal payments. Therefore, a Client invested in such Pooled Investment Vehicles may be unable to sell its interests at the most opportune times as Anchin or the Selected Manager may advise.

- ***Mutual Funds*** - Investments may include mutual funds. Like Pooled Investment Vehicles, investors in mutual funds must pay certain fees and charges (e.g., sales charges, annual fees, and other expenses), regardless of the mutual fund's performance. Therefore, such costs lower a Client's investment performance.

Moreover, investors may have to pay taxes on capital gains distributions they receive, even if the mutual fund performed poorly. (We are not providing tax advice. Please consult independent tax counsel.) A Client may have to pay taxes on his pro rata share of the fund's capital gains while still invested in the fund.

Finally, the price at which an investor can purchase or redeem mutual fund shares is generally dependant on the fund's net asset value, which is generally calculated once a day, after the U.S. exchanges close. Therefore, a Client will not know what the purchase or sale price of the mutual fund shares are until after the broker-dealer effects the transaction.

- **ETFs** - Investments may include ETFs. There are many different categories of ETFs that include, but is not limited to, ETFs based on: different types of investments (e.g., bond ETF, commodities ETF, derivatives ETF, etc.); an index (e.g., domestic market index or foreign market index); style (e.g., large cap, mid cap or small cap, etc.); and industry or sector (e.g., pharmaceuticals, biotech or energy).

The risks associated with the various types of ETFs are based on many different factors, including, but not limited to, market conditions, use of leverage, the performance of the underlying securities held by the ETF and the performance of the portfolio manager. In addition, ETFs incur sales charges and other fees. Such costs lower a Client's investment performance.

Additional risk factors provided to the Clients by the Selected Managers, if any, should be reviewed carefully.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Anchin Capital Advisors, LLC

The principal executive officer and other employees of Anchin are Registered Representatives of Anchin Capital Advisors LLC ("ACA"), a broker-dealer. ACA provides merger and acquisition services, acquisition consulting services, and venture capital and private placement financing services and shares in commissions for the sale of variable annuities. As such, it is not anticipated that ACA will act as a broker-dealer for transactions recommended to Anchin's advisory Clients. However, if Anchin learns that a Client may have a need for the specialized services provided by ACA, Anchin may suggest the use of ACA, and any fees that ACA receives for such services will be entirely separate and distinct from Anchin's advisory fees.

ACA may receive fees from the sale of private placements, merger and acquisition consulting and variable annuity products to clients. Anchin may recommend that clients purchase ACA private placements, participate in merger and acquisition transactions or purchase variable annuities. ACA's fee may create a conflict of interest and create an incentive for Anchin to recommend that clients purchase such products. However, Anchin seeks to provide investment supervisory advice that is in the best interest of its clients and the clients are under no obligation to purchase any recommended product.

Anchin, Block & Anchin LLP

Anchin, Block & Anchin LLP ("ABA"), is a CPA firm and the ultimate parent company of Anchin. ABA may recommend Anchin to accounting clients in need of advisory services. Anchin may recommend ABA to advisory clients in need of accounting, tax, estate planning, litigation support and consulting services, all of which creates a conflict of interest. Accounting, tax, estate planning, litigation support and consulting services provided by ABA are separate and distinct from the advisory services of Anchin, and are

provided for separate and typical compensation. There are no referral fee arrangements between Anchin and ABA for these recommendations. No Anchin client is obligated to use ABA for any accounting, tax, estate planning, litigation support or consulting services.

Anchin Risk Management, LLC

Anchin Risk Management, LLC ("ARM") is an insurance broker registered with the state of New York. Certain of Anchin's associated persons are agents and/or brokers for various insurance companies. Anchin may recommend the use of ARM and these individuals to implement insurance transaction recommended to advisory clients which create a conflict of interest. In this situation, ARM and these individuals will be able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. No client is obligated to use ARM or these individuals to purchase insurance.

Anchin may recommend third-party insurance companies to sell variable insurance products to Anchin clients and ACA may share the insurance commission with the selected third-party insurance companies. Clients will not pay a higher fee than what would normally be charged for those insurance products. Insurance commission sharing arrangements create a conflict of interest and may encourage Anchin to select those third-party insurance companies with whom ACA has that type of arrangement. Anchin selects third-party insurance companies based on the quality of the value of the insurance product, the quality (e.g., rating) of the insurance company providing the insurance product, the cost and the needs of the client purchasing the insurance product.

Pending - Registered Representatives of NFP Securities

Some of our representatives have **pending** applications to be registered representatives of NFP Securities, Inc., a securities broker-dealer. Anchin and NFP Securities, Inc. are not related companies. **Upon approval** with NFP Securities, you may work with your investment adviser representative in his or her separate capacity as a registered representative of NFP Securities. When acting in his or her separate capacity as a registered representative, your investment adviser representative may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to you. As such, your investment adviser representative may suggest that you implement investment advice by purchasing securities products through a commission-based brokerage account in addition to or in lieu of a fee-based investment-advisory account. This receipt of commissions creates an incentive to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as a registered representative of a securities broker-dealer. Consequently, the objectivity of the advice rendered to you could be biased.

You are under no obligation to use the services of our representatives in this separate capacity or to use NFP Securities and can select any broker/dealer you wish to implement securities transactions. If you select our representatives to implement securities transactions in their separate capacity as registered representatives, they must use NFP Securities. Prior to effecting any such transactions, you are required to enter into a new account agreement with NFP Securities. The commissions charged by NFP Securities may be higher or lower than those charged by other broker/dealers. In addition, the registered representatives may also receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that you maintain the mutual fund investment.

Pending - Investment Adviser Representative of NFP Securities, Inc.

Some of our representatives have **pending** applications to register as investment adviser representatives with NFP Securities, Inc. **Upon approval**, they will be able to provide asset management services and will earn advisory fees when providing these services through NFP Securities, Inc.

Our individual advisor representatives will be able to work with you in their separate capacities as investment adviser representatives of NFP Securities, Inc. In these situations, you will be required to execute agreements and forms required by NFP Securities, Inc. Additional written disclosures and information is provided to clients choosing such an arrangement.

Third-Party Money Managers

As previously described in Item 4 and Item 5 of this disclosure brochure, Anchin has a program designed to allow us to recommend and select third-party money managers for you. Once you select the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay us a portion of the fees you are charged. Please refer to Items 4 and 5 for full details regarding the programs, fees, conflicts of interest and materials arrangements when Anchin selects other investment advisers.

Sub-Advisors

As described in Item 4 and Item 5, Anchin has formed relationships with independent, investment advisers to serve as sub-advisors. Anchin may recommend clients work directly with third-party sub-advisors. Unlike our Third-Party Money Manager service, we do not receive a referral fee when selecting sub-advisors. Fees charged by Sub-Advisors are separate from the fees we charge for this service.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

Anchin has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Anchin's Code of Ethics describes the firm's fiduciary duties and responsibilities to Clients, and sets forth Anchin's practice of supervising the personal securities transactions of supervised persons with access to Client information. Individuals associated with Anchin may buy or sell securities for their personal accounts identical to or different than those recommended to Clients. It is the expressed policy of Anchin that no person employed by Anchin shall prefer his or her own interest to that of an advisory Client or make personal investment decisions based on the investment decisions of advisory Clients.

To supervise compliance with its Code of Ethics, Anchin requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. Anchin requires such access persons to also receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

Anchin requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Anchin's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. Any individual not in observance of the above may be subject to discipline.

The foregoing is only a summary of Anchin's code of ethics; you may request a copy of Anchin's code of ethics from Jeffrey Vorchheimer: Anchin Wealth Management, LLC, 1375 Broadway, New York, New York 10018.

Affiliate and Employee Personal Securities Transactions Disclosure

Anchin and its related persons do not recommend securities of individual companies or corporations to clients, nor do they buy or sell individual securities for clients' accounts. However, Anchin may recommend mutual funds, ETFs, limited partnerships and other alternative investment vehicles. Nevertheless, neither Anchin nor its related persons recommend securities in which Anchin or its related persons have a material financial interest.

It is the expressed policy of Anchin that no person employed by Anchin shall prefer his or her own interest to that of an advisory Client or make personal investment decisions based on the investment decisions of advisory clients.

Item 12 – Brokerage Practices

Our **Third Party Money Manager** services do not include the selection or recommendation of broker-dealers to be used for implementation of client securities transactions. Recommended money managers are responsible for selecting and determining brokerage platforms.

Specific to our **Sub-Advisor Asset Allocation and Investment Management Service**, Charles Schwab & Company, Inc. (Charles Schwab) will be used. Therefore, you will need to establish a brokerage account with Charles Schwab if you do not already have an account at Charles Schwab. Charles Schwab is a registered broker-dealer, member SIPC, and will maintain custody of your assets and provide execution of securities transactions. Anchin and Charles Schwab are not affiliated companies.

Please note that not all investment advisors require the use of a specific broker/dealer. Some investment advisors allow clients to select the broker/dealer. However, for compliance and operational efficiency purposes, we have decided to require all clients open accounts through Charles Schwab.

The decision to require Charles Schwab is based on the firm's participation in Schwab Institutional. Anchin is independently owned and operated and not affiliated with Charles Schwab. Through the Schwab Institutional platform, Anchin is provided with access to Charles Schwab's institutional trading and custody services, which are typically not available to Charles Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least: \$10 million of firm clients' assets is maintained in accounts at Schwab Institutional and is not otherwise contingent upon Anchin committing to Charles Schwab any specific amount of business (assets in custody or trading). Charles Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Anchin' clients' accounts maintained in its custody, Charles Schwab does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Charles Schwab or that settle into Charles Schwab accounts.

Charles Schwab also makes available to Anchin other products and services that benefit Anchin but may not benefit its clients' accounts. Some of these other products and services assist Anchin in administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); provide research, pricing information and other market data; facilitate payment of advisory fees from its clients' accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Anchin accounts. Schwab Institutional also makes available to Anchin other services intended to help Anchin manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice

management, information technology, business succession, regulatory compliance and marketing. In addition, Charles Schwab may make available, arrange and/or pay for these types of services rendered to Anchin by independent third party service providers. While as a fiduciary, Anchin endeavors to act in its clients' best interests, and while the recommendation that clients maintain their assets in accounts at Charles Schwab may be based in part on the benefit to Anchin of the availability of some of the foregoing products and services; nevertheless, these products and services by facilitating the firm's workload are also effectively benefiting advisor's clients as well.

We have not entered into any soft dollar agreements with any brokers/dealers. We are not receiving services for free or at a nominal rate based on clients directed to Schwab, other than services that we would have received for free (or at a nominal rate) irrespective of volumes or clients directed to Schwab. Additionally, brokers and dealers do not refer clients to us.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Anchin continually reviews the securities investments directly recommended to the Client by Anchin. Anchin reviews the performance of Selected Managers it recommends to Clients quarterly. All Client accounts are reviewed quarterly by an advisory person of Anchin. Accounts are reviewed by your investment adviser representative. More frequent reviews may be triggered by material market, economic or political events, or by changes in the Client's circumstances.

Accounts established and maintained with other third-party money managers are reviewed at least quarterly, usually when statements and/or reports are received from the money manager.

Statements and Reports

You will receive a monthly statement and regular trade confirmations from your custodian (unless you elect not to receive the trade confirmations).

Whether reports by an outside money manager are provided to you will depend upon the outside money manager.

You are encouraged to always compare any reports or statements provided by us, a sub-adviser or third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Anchin may from time to time compensate, either directly or indirectly, third-party investment advisers who make Client referrals by paying a part of Anchin's investment management fee or otherwise sharing the third-party investment adviser's fee. Any referral payments will comply with all federal and state laws including, with respect to cash solicitation fees, the requirements of Rule 206(4)-3 under the Advisers Act.

Anchin does not receive economic benefits from any non-Clients for providing investment advice or advisory services to Anchin Clients.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Anchin is deemed to have custody of client funds and securities whenever Anchin is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Anchin will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Anchin is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Anchin. When clients have questions about their account statements, they should contact Anchin or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

Specific to our **Sub-Advisor Asset Allocation and Investment Management Service**, upon receiving written authorization from the client in our contract for services, our allocation, portfolio construction and monitoring services are provided on a **discretionary** basis. When discretionary authority is granted, we have the authority to determine the money manager that will manage all or a portion of the client's account without obtaining the client's consent prior to engaging the manager.

Please note we do not have discretionary authority (or any other authority) to determine the securities or amount of securities managed directly by a money manager. The selected money managers will be provided discretionary authority to manage client accounts.

Item 17 – Voting Client Securities

Anchin does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Anchin does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Anchin has not been the subject of a bankruptcy petition at any time.

