

**Item 1. Cover Page**



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# **Disclosure Brochure**

**January 27, 2014**

This brochure provides information about the qualifications and business practices of Maltin Wealth Management, Inc. (hereinafter "Maltin Wealth Management"). If you have any questions about the contents of this brochure, please contact Peter L. Maltin at (201) 215-3855. 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 Maltin Wealth Management, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Maltin Wealth Management, Inc. is an SEC registered investment adviser. Registration does not imply any level of skill or training.

## **Item 2. Material Changes**

This Item discusses only the material changes that have occurred since Maltin Wealth Management's last annual update.

### **Material Changes:**

Several items, notably Items 4 (Information About Your Advisory Business) and Item 8 (Methods of Analysis, Investment Strategies and Risk of Loss) are revised to discontinue references to the use of independent managers, as Maltin Wealth Management, Inc. does not recommend the use of such managers.

Item 5 is substantially changed to discontinue references to professionals being registered representatives of a broker-dealer, as no professional affiliated with Maltin Wealth Management is a registered representative of a broker-dealer.

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## **Item 4. Advisory Business**

Maltin Wealth Management (also referred to as the “Firm”) launched September 2012 to provide clients with investment management, financial planning and consulting services. The Firm is principally owned by Peter L. Maltin. Prior to engaging Maltin Wealth Management to provide any of the foregoing investment advisory services, the client is required to enter into one or more written agreements with Maltin Wealth Management setting forth the terms and conditions under which Maltin Wealth Management renders its services (collectively the “*Agreement*”).

As of the date of this brochure, Maltin Wealth Management has \$100,279,210 in total assets under management, in 573 accounts. Of these figures 89,923,235 are discretionary in 513 accounts.

This Disclosure Brochure describes the business of Maltin Wealth Management. Certain sections will also describe the activities of *Supervised Persons* who are any of the Firm’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on Maltin Wealth Management’s behalf and are subject to the Firm’s supervision.

### **Financial Planning and Consulting Services**

Maltin Wealth Management may provide its clients with a broad range of comprehensive financial planning and consulting services. While these services are typically included on an “as needed” basis in conjunction with Maltin Wealth Management’s investment management offering (described below), the Firm may also provide such services as part of a separate, stand-alone arrangement. Financial planning and consulting services generally include specific recommendations to clients regarding business, retirement and estate planning, cash flow forecasting, asset allocating, education funding, and insurance needs analysis.

In performing any of these services, Maltin Wealth Management is not required to verify any information received from the client or from the client’s other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information.

Maltin Wealth Management may recommend the services of itself and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if Maltin Wealth Management recommends its own services. Clients are under no obligation to act upon any of the recommendations made by Maltin Wealth Management under a financial planning or consulting engagement or to engage the services of any such recommended professional, including Maltin Wealth Management itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of Maltin Wealth Management’s recommendations. Clients are advised that it remains their responsibility to promptly notify Maltin Wealth Management if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Maltin Wealth Management’s previous recommendations and/or services.

### **Investment Management Services**

Clients can engage Maltin Wealth Management to manage all or a portion of their assets on a discretionary or non-discretionary basis. Maltin Wealth Management primarily allocates clients’ investment management assets among mutual funds, exchange-traded funds (“ETFs”) and structured notes. Assets may also be allocated to individual debt and equity securities, and options based upon the individual client’s needs. Maltin Wealth Management may also advise on other types of investments held in clients’ portfolios, as needed.

Clients may engage Maltin Wealth Management to advise on certain of their assets that are not maintained with their primary custodian (e.g., variable life/annuity products, individual employer-sponsored retirement plans, qualified tuition plans, etc.). These assets are generally maintained at the custodian designated by the product's provider or the underwriting insurance company. In these situations, Maltin Wealth Management directs or recommends the allocation of client assets among the various investment options that are available with the product.

Maltin Wealth Management tailors its advisory services to the individual needs of clients. Maltin Wealth Management consults with clients initially and on an ongoing basis to determine risk tolerance, time horizon and other factors that may impact the clients' investment needs. Maltin Wealth Management ensures that clients' investments are suitable for their investment needs, goals, objectives and risk tolerance. Clients are advised to promptly notify Maltin Wealth Management if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Maltin Wealth Management's management services. Clients may impose reasonable restrictions or mandates on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in Maltin Wealth Management's sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

These investment management services are generally provided under a wrap fee program (the "Program") (i.e., where Maltin Wealth Management includes securities brokerage charges and transaction fees as part of its overall management fee). Additional information about the Program is available in Maltin Wealth Management's separate wrap brochure, which appears as Part 2A Appendix 1 of the Firm's Form ADV (the "Wrap Fee Brochure").

### **Other Consulting**

From time to time, the Firm may be engaged to perform consulting outside the scope of traditional asset management or financial planning services. Consulting topics by their nature may vary greatly, but may include discussions regarding a client's business, real estate or other personal assets. Clients who engage Maltin Wealth Management to provide such consulting services will generally be required to execute a Consulting Agreement.

## **Item 5. Fees and Compensation**

Maltin Wealth Management offers its services on a fee basis, which may include hourly and/or fixed fees, as well as fees based upon assets under management. In limited circumstances depending upon the size of the account, clients who engage Maltin Wealth Management to provide financial planning services only, who then also engage Maltin Wealth Management to provide asset management services may receive a credit against their asset management fees in the amount of their payment for financial planning services.

### **Financial Planning and Consulting Fees**

Maltin Wealth Management generally charges a negotiable fixed fee and/or hourly fee for financial planning and consulting services that are offered on a stand-alone basis. These fees generally range from \$2,500 to \$5,000 on a fixed fee basis and are offered at \$350 on an hourly rate basis, depending upon the scope of services and

the professional rendering the financial planning or consulting services. As stated above, the Firm may also include financial planning services as part of its overall asset-based investment management fee.

Maltin Wealth Management generally requires one-half of the financial planning and/or consulting fee payable upon execution of the *Agreement*. The balance is generally due upon delivery of the financial plan or completion of the agreed upon services. If the client engages Maltin Wealth Management for additional investment advisory services, Maltin Wealth Management may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

### **Investment Management Fee**

Maltin Wealth Management provides investment management services for an annual wrap fee based upon the amount of assets under the Firm's management. A complete description of the Program's terms and conditions (including fees) are contained in the Program's Wrap Fee Brochure.

### **Fees Charged by Financial Institutions**

As further discussed in response to Item 12 (below), Maltin Wealth Management generally recommends that clients utilize the brokerage and clearing services of an independent broker-dealer for investment management accounts.

Maltin Wealth Management may only implement its investment management recommendations after the client has arranged for and furnished Maltin Wealth Management with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to any broker-dealers recommended by Maltin Wealth Management, broker-dealers directed by the client, trust companies, banks etc. (collectively referred to herein as the "*Financial Institutions*").

Clients may incur certain charges imposed by the *Financial Institutions* and other third parties such as custodial fees, charges imposed directly by a mutual fund or ETF in the account, which are disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), margin fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of the Program, if any, clients may incur separate brokerage commissions and transaction fees.

### **Fee Debit**

Maltin Wealth Management's Agreement and the separate agreement with any Financial Institutions authorize Maltin Wealth Management to debit the client's account for the amount of Maltin Wealth Management's fee and to directly remit that management fee to Maltin Wealth Management. Any Financial Institutions recommended by Maltin Wealth Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Maltin Wealth Management.

### **Account Additions and Withdrawals**

Clients may make additions to and withdrawals from their account at any time, subject to Maltin Wealth Management's right to terminate an account. Additions may be in cash or securities provided that Maltin Wealth

Management reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to Maltin Wealth Management, subject to the usual and customary securities settlement procedures. However, Maltin Wealth Management designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Maltin Wealth Management may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level and tax ramifications.

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

Maltin Wealth Management does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7. Types of Clients**

Maltin Wealth Management generally provides its services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

### **Minimums**

Maltin Wealth Management does not impose a minimum portfolio size or minimum annual fee for starting or maintain an account.

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

### **Methods of Analysis**

Maltin Wealth Management will generally utilize a combination of fundamental and technical methods of analysis.

*Fundamental analysis* involves the fundamental financial condition and competitive position of a company. Maltin Wealth Management will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Maltin Wealth Management will be able to accurately predict such a reoccurrence.

## **Investment Strategies**

Maltin Wealth Management draws from numerous asset classes to construct a diversified portfolio that mirrors the client's time horizon, objectives, and tax status. In constructing a portfolio, the Firm primarily utilizes mutual funds, ETFs and structured notes, and to a lesser extent, utilizes individual debt and equity securities, and options.. The Firm's investment strategy begins with a "top down" review, emphasizing the big picture of the global economy and trends. From there, Maltin Wealth Management delineates size, style and sector distribution for equity-based investments, as well as quality and duration for investments pertaining to the debt markets. A "bottom up" approach is thereafter used to identify opportunities within specific investments. To manage risk as well as return, Maltin Wealth Management seeks to incorporate investments with historically low or negative correlations to one another.

## **Risks of Loss**

### *General Risk of Loss*

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

### *Market Risks*

The profitability of a portion of Maltin Wealth Management's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Maltin Wealth Management will be able to predict those price movements accurately.

### *Options*

Options allow investors to buy or sell a security at a contracted "strike" price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option.



Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

#### *Use of Margin*

To the extent that a client authorizes the use of margin, and margin is thereafter employed by Maltin Wealth Management in the management of the client's investment portfolio, the market value of the client's account and corresponding fee payable by the client to Maltin Wealth Management will not be increased.

While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a client's portfolio may be subject. Borrowings will usually be from securities brokers and dealers and will typically be secured by the client's securities and/or other assets. Under certain circumstances, such a broker-dealer may demand an increase in the collateral that secures the client's obligations and if the client were unable to provide additional collateral, the broker-dealer could liquidate assets held in the account to satisfy the client's obligations to the broker-dealer. Liquidation in that manner could have extremely adverse consequences. In addition, the amount of the client's borrowings and the interest rates on those borrowings, which will fluctuate, will have a significant effect on the client's profitability.

### **Item 9. Disciplinary Information**

Maltin Wealth Management has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management.

### **Item 10. Other Financial Industry Activities and Affiliations**

Maltin Wealth Management is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. Maltin Wealth Management has described such relationships and arrangements below.

### **Item 11. Code of Ethics**

Maltin Wealth Management and persons associated with Maltin Wealth Management ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with the Firm's policies and procedures.

Maltin Wealth Management has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). The Firm's *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by Maltin Wealth Management or any of its associated persons. The *Code of Ethics* also requires that certain of Maltin Wealth Management's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the *Access Person* is completed as part of a batch trade (as defined below in Item 12) with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact Maltin Wealth Management to request a copy of its *Code of Ethics*.

## Item 12. Brokerage Practices

Maltin Wealth Management generally recommends that clients utilize the brokerage and clearing services of Fidelity Institutional Wealth Services ("*Fidelity*") for investment management accounts.

Factors which Maltin Wealth Management considers in recommending *Fidelity* or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. *Fidelity* enables Maltin Wealth Management to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by *Fidelity* may be higher or lower than those charged by other *Financial Institutions*.

The commissions paid by Maltin Wealth Management's clients comply with Maltin Wealth Management's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified *Financial Institution* might charge to effect the same transaction where Maltin Wealth Management determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a *Financial Institution's* services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Maltin Wealth Management seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Maltin Wealth Management periodically and systematically reviews its policies and procedures regarding its recommendation of *Financial Institutions* in light of its duty to obtain best execution.

The client may direct Maltin Wealth Management in writing to use a particular *Financial Institution* to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the

account with that *Financial Institution*, and Maltin Wealth Management will not seek better execution services or prices from other *Financial Institutions* or be able to “batch” client transactions for execution through other *Financial Institutions* with orders for other accounts managed by Maltin Wealth Management (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Maltin Wealth Management may decline a client’s request to direct brokerage if, in Maltin Wealth Management’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

Transactions for each client generally will be effected independently, unless Maltin Wealth Management decides to purchase or sell the same securities for several clients at approximately the same time. Maltin Wealth Management may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Maltin Wealth Management’s clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Maltin Wealth Management’s clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that Maltin Wealth Management determines to aggregate client orders for the purchase or sale of securities, including securities in which Maltin Wealth Management’s *Supervised Persons* may invest, Maltin Wealth Management generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Maltin Wealth Management does not receive any additional compensation or remuneration as a result of the aggregation. In the event that Maltin Wealth Management determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, Maltin Wealth Management may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist Maltin Wealth Management in its investment decision-making process. Such research generally will be used to service all of Maltin Wealth Management’s clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client’s portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Maltin Wealth Management does not have to produce or pay for the products or services.

## **Software and Support Provided by Financial Institutions**

Maltin Wealth Management may receive from Fidelity, without cost to Maltin Wealth Management, computer software and related systems support, which allow Maltin Wealth Management to better monitor client accounts maintained at Fidelity. Maltin Wealth Management may receive the software and related support without cost because Maltin Wealth Management renders investment management services to clients that maintain assets at Fidelity. The software and support is not provided in connection with securities transactions of clients (i.e. not “soft dollars”). The software and related systems support may benefit Maltin Wealth Management, but not its clients directly. In fulfilling its duties to its clients, Maltin Wealth Management endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Maltin Wealth Management’s receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Maltin Wealth Management’s choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Maltin Wealth Management may also receive the following benefits from Fidelity through the Fidelity Institutional Wealth Services Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Institutional Wealth Services Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

## **Item 13. Review of Accounts**

### **Account Reviews**

Maltin Wealth Management monitors the portfolios of its investment management clients as part of a continuous and ongoing process, while formal account reviews are conducted at least annually. For those clients to whom Maltin Wealth Management provides financial planning and/or consulting services, reviews are conducted on an “as needed” basis. All such reviews are conducted by one of Maltin Wealth Management’s investment adviser representatives. All clients are encouraged to discuss their needs, goals, and objectives with Maltin Wealth Management and to keep Maltin Wealth Management informed of any changes thereto. Furthermore, Maltin Wealth Management contacts ongoing investment management clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client’s financial situation and/or investment objectives.

### **General Reports**

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. From time to time, or as otherwise requested, investment management clients may also receive written or electronic reports from Maltin Wealth Management that include account and/or market-related information, such as an inventory of account holdings and account performance. Clients should compare the account statements they receive from their custodian with those they receive from Maltin Wealth Management.

## **Item 14. Client Referrals and Other Compensation**

The Firm may receive economic benefits from non-clients for providing advice or other advisory services to clients. This type of relationship poses a conflict of interest and any such relationship has already been disclosed in response to Item 12, above.

In addition, Maltin Wealth Management is required to disclose any direct or indirect compensation that it provides for client referrals. Maltin Wealth Management does not currently provide compensation to third-party solicitors for client referrals.

## **Item 15. Custody**

Maltin Wealth Management's *Agreement* and/or the separate agreement with any *Financial Institution* may authorize Maltin Wealth Management through such *Financial Institution* to debit the client's account for the amount of Maltin Wealth Management's fee and to directly remit that management fee to Maltin Wealth Management in accordance with applicable custody rules.

*The Financial Institutions* recommended by Maltin Wealth Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to Maltin Wealth Management. In addition, as discussed in Item 13, Maltin Wealth Management may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from Maltin Wealth Management.

## **Item 16. Investment Discretion**

Maltin Wealth Management may be given the authority to exercise discretion on behalf of clients. Maltin Wealth Management is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Maltin Wealth Management is given this authority through a power-of-attorney included in the agreement between Maltin Wealth Management and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Maltin Wealth Management takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

## **Item 17. Voting Client Securities**

Maltin Wealth Management is required to disclose if it accepts authority to vote client securities. Maltin Wealth Management does not vote client securities on behalf of its clients. Clients receive proxies directly from the *Financial Institutions*.

## **Item 18. Financial Information**

Maltin Wealth Management does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Maltin Wealth Management is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Maltin Wealth Management has no disclosures pursuant to this Item.

## Item 1. Cover Page

### Maltin Wealth Management Wrap Fee Program

Sponsored By



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## Wrap Fee Program Brochure

January 27, 2014

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## **Item 2. Material Changes**

This Item discusses only the material changes that have occurred since Maltin Wealth Management's last annual update.

Material Changes:

Several items are revised to discontinue references to the use of independent managers, as Maltin Wealth Management, Inc. does not recommend the use of such managers. The only manager in the wrap program is Maltin Wealth Management.

Substantial modifications are also made throughout this Wrap Fee Brochure to discontinue references to professionals being registered representatives of a broker-dealer, as no professional affiliated with Maltin Wealth Management is a registered representative of a broker-dealer.



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## **Item 4. Services, Fees and Compensation**

The Maltin Wealth Management Wrap Fee Program (the “Program”) is an investment advisory program sponsored by Maltin Wealth Management, a registered investment adviser which was launched September 2012.

This Wrap Fee Brochure describes the business of Maltin Wealth Management as it relates to clients receiving services through the Program. Certain sections also describe the activities of the Firm’s Supervised Persons, which refer to any officers, partners, directors (or other person occupying a similar status or performing similar functions), employees, or other persons who provide investment advice on Maltin Wealth Management’s behalf and are subject to the Firm’s supervision.

In addition to the Program, the Firm also offers financial planning, consulting and investment management services under different arrangements than those described herein. Information about these services is contained in Maltin Wealth Management’s Disclosure Brochure, which appears as Part 2A of the Firm’s Form ADV.

### **Description of the Program**

The Program is offered as a wrap fee program, which provides clients with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and the execution of client transactions for a specified fee or fees not based upon transactions in their accounts.

Prior to receiving services through the Program, clients are required to enter into a written agreement with Maltin Wealth Management setting forth the relevant terms and conditions of the advisory relationship (the “*Agreement*”). Clients must also open a new securities brokerage account and complete a new account agreement with Fidelity Institutional Wealth Services (“*Fidelity*”) or another broker-dealer Maltin Wealth Management approves for participation under the Program (collectively “*Financial Institutions*”).

At the onset of the Program, clients complete an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon and risk tolerance, as well as any other factors pertinent to their specific financial situations. After an analysis of the relevant information, Maltin Wealth Management assists its clients in developing an appropriate strategy for managing their assets. Clients’ investment portfolios are generally managed on a discretionary or non-discretionary basis by Maltin Wealth Management’s investment adviser representatives. Maltin Wealth Management generally allocate clients’ assets among the various investment products available under the Program, as described further in Item 6 (below).

### **Fees for Participation in the Program**

Investment management services are offered through the Program on a fee basis, meaning that clients pay a single annualized fee based upon assets under management. The Firm also offers advisory services outside of the Program under different fee arrangements than those discussed below.

Maltin Wealth Management’s asset based fee generally varies between 75 and 200 basis points (0.75% – 2.00%), depending upon the amount of the assets being managed under the Program, as follows:

PORTFOLIO VALUE	ANNUAL FEE
Up to \$1,000,000	2.00%
\$1,000,001 - \$2,000,000	1.50%
\$2,000,001 - \$5,000,000	1.25%
\$5,000,001 - \$10,000,000	1.00%
Above \$10,000,000	0.75%

Unless otherwise agreed with the client, Maltin Wealth Management will include any allocations to cash in the account size for the purpose of calculating breakpoints and fees due.

In limited circumstances, some clients may pay lower fees than those stated above, based on "grandfather" status, negotiation with the firm, or the aggregation of various accounts to determine the fee breakpoint. The fee is prorated and charged quarterly, in advance, based upon the average daily balance of the assets being managed by Maltin Wealth Management during the previous quarter. Since the fee is determined by average daily account balance, if assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted accordingly.

Maltin Wealth Management does not typically recommend that clients trade on margin or otherwise attempt to increase performance through leverage. However, to the extent a client does trade on margin, the value used to determine the amount of fees payable to Maltin Wealth Management. This presents a conflict of interest, as Maltin Wealth Management will have an incentive to recommend margin, as trading on margin has the potential to increase, even temporarily, the value of the assets which in turn increases the amount of fees due to Maltin Wealth Management. As stated above, margin is not typically recommended, as the risks are significant. Please see Part 2A, Item 8 for a discussion of risk factors, including trading on margin.

For the initial term of the Program, the fee is calculated on a *pro rata* basis. In the event the *Agreement* is terminated, the fee for the final quarter is prorated through the effective date of the termination and any remaining balance is refunded to the client.

### **Fee Comparison**

A portion of the fees paid to Maltin Wealth Management are used to cover the securities brokerage commissions and transactional costs attributed to the management of its clients' portfolios..

Services provided through the Program may cost clients more or less than purchasing these services separately. The number of transactions made in clients' accounts, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Fees paid for the Program may also be higher or lower than fees charged by other sponsors of comparable investment advisory programs.

### **Fee Discretion**

Maltin Wealth Management, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets

to be managed, related accounts, account composition, pre-existing client relationship, account retention and *pro bono* activities.

### **Effect of Margin**

Portfolio assets acquired on margin are not included in the market value of clients' accounts for purposes of calculating Maltin Wealth Management's fee.

### **Fee Debit**

The Firm's *Agreement* and the separate agreement with any *Financial Institutions* authorize Maltin Wealth Management to debit the clients' accounts for the amount of the Program fee and to directly remit that fee to Maltin Wealth Management. Any *Financial Institutions* recommended by Maltin Wealth Management have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of Program fees paid directly to Maltin Wealth Management.

### **Account Additions and Withdrawals**

Clients may make additions to and withdrawals from their account at any time, subject to Maltin Wealth Management's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to Maltin Wealth Management, subject to the usual and customary securities settlement procedures. However, Maltin Wealth Management designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Maltin Wealth Management may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level and tax ramifications. Moreover, as stated above, since the fee is determined by average daily account balance, if assets are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is adjusted accordingly.

### **Other Charges**

Clients may incur certain charges imposed by third parties in addition to the Program fee. These additional charges may include charges imposed directly by a mutual fund or exchange-traded fund ("ETF") in the account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), margin fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

### **Compensation for Recommending the Program**

Maltin Wealth Management has no internal arrangements in place whereby persons recommending the Program are entitled to receive additional compensation as a result of clients' participation in the Program.

## **Item 5. Account Requirements and Types of Clients**

### **Minimums**

Maltin Wealth Management does not impose a minimum portfolio size or minimum annual fee for participation in the Program.

### **Types of Clients**

Services through the Program are generally offered to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

## **Item 6. Portfolio Manager Selection and Evaluation**

Clients' investment portfolios are managed directly by Maltin Wealth Management.

### **Portfolio Management**

Clients can engage Maltin Wealth Management to manage all or a portion of their assets on a discretionary or non-discretionary basis. Maltin Wealth Management primarily allocates clients' assets among mutual funds, ETFs and structured notes. Clients' assets may also be allocated to individual debt and equity securities and options. Maltin Wealth Management may also advise on other types of investments held in clients' portfolios, as needed.

Clients may also engage Maltin Wealth Management to advise on certain of their assets that are not maintained with their primary custodian (e.g., variable life/annuity products, individual employer-sponsored retirement plans, qualified tuition plans, etc.). These assets are generally maintained at the custodian designated by the product's provider or the underwriting insurance company. In these situations, Maltin Wealth Management directs or recommends the allocation of client assets among the various investment options that are available with the product.

Maltin Wealth Management tailors its advisory services to the individual needs of clients. Maltin Wealth Management consults with clients initially and on an ongoing basis to determine risk tolerance, time horizon and other factors that may impact the clients' investment needs. Maltin Wealth Management ensures that clients' investments are suitable for their investment needs, goals, objectives and risk tolerance. Clients are advised to promptly notify Maltin Wealth Management if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Maltin Wealth Management's management services. Clients may impose reasonable restrictions or mandates on the management of their account (e.g., require that a portion of their assets be invested in socially responsible funds) if, in Maltin Wealth Management's sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

### **Side-By-Side Management**

Maltin Wealth Management does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

### **Methods of Analysis**

Maltin Wealth Management's will generally utilize a combination of fundamental and technical methods of analysis.

*Fundamental analysis* involves the fundamental financial condition and competitive position of a company. Maltin Wealth Management will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Maltin Wealth Management will be able to accurately predict such a reoccurrence.

## **Investment Strategies**

Maltin Wealth Management draws from numerous asset classes to construct a diversified portfolio that mirrors the client's time horizon, objectives, and tax status. In constructing a portfolio, the Firm primarily utilizes mutual funds, ETFs and structured notes, and to a lesser extent, utilizes individual debt and equity securities, and options. The Firm's investment strategy begins with a "top down" review, emphasizing the big picture of the global economy and trends. From there, Maltin Wealth Management delineates size, style and sector distribution for equity-based investments, as well as quality and duration for investments pertaining to the debt markets. A "bottom up" approach is thereafter used to identify opportunities within specific investments. To manage risk as well as return, Maltin Wealth Management seeks to incorporate investments with historically low or negative correlations to one another.

## **Risks of Loss**

### *General Risk of Loss*

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may

cause the shares to trade at a premium or discount to their *pro rata* NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

#### *Market Risks*

The profitability of a portion of Maltin Wealth Management' recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Maltin Wealth Management will be able to predict those price movements accurately.

#### *Options*

Options allow investors to buy or sell a security at a contracted strike price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge against potential losses or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase or decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

#### *Use of Margin*

While the use of margin borrowing can substantially improve returns, it may also increase overall portfolio risk. Margin transactions are generally effected using capital borrowed from a *Financial Institution*, which is secured by a client's holdings. Under certain circumstances, a lending *Financial Institution* may demand an increase in the underlying collateral. If the client is unable to provide the additional collateral, the *Financial Institution* may liquidate account assets to satisfy the client's outstanding obligations, which could have extremely adverse consequences. In addition, fluctuations in the amount of a client's borrowings and the corresponding interest rates may have a significant effect on the profitability and stability of a client's portfolio.

#### *Political Risks*

Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.

#### *General Market Risks*

Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.

#### *Currency Risk*

When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.

#### *Regulatory Risk*

Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.

#### *Tax Risks Related to Short Term Trading*

Clients should note that Maltin Wealth Management may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Maltin Wealth Management endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.

#### *Risks Related to Investment Term*

Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value.

#### *Purchasing Power Risk.*

Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.

#### *Business Risk*

This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.

Financial Risk. The amount of debt or leverage determines the financial risk of a company.

#### *Default Risk*

This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.

#### *Short Sales*

"Short sales" are a way to implement a trade in a security Maltin Wealth Management feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. Maltin Wealth Management utilizes short sales only when the client's risk tolerances permit.

#### *Information Risk*

All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

#### *Small Companies*

Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also



have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

#### **Concentration Risk**

While Maltin Wealth Management selects individual equities and bonds for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

#### ***Transition risk***

As assets are transitioned from a client's prior advisers to Maltin Wealth Management there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Maltin Wealth Management. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Maltin Wealth Management may adversely affect the client's account values, as Maltin Wealth Management's recommendations may not be able to be fully implemented.

#### ***Restriction Risk***

Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

#### ***Risks Related to Investment Term & Liquidity***

Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

***Calculation of Tax Basis:*** If a client is unable to provide information on cost basis for tax purposes for each investment at the onset of the client relationship, Maltin Wealth Management will be unable to provide accurate cost basis information in the future. To the extent any cost basis calculation is ever performed for a client, such client should be aware that without accurate information, any cost basis estimates prepared by Maltin Wealth Management will be based on the information available combined with certain assumptions as well as mathematical computation. Therefore, if the cost basis is not accurate at the onset of the relationship, there is no guarantee that Maltin Wealth Management's calculations will be correct, and materially adverse tax circumstances may result.

**Voting of Client Securities**

Maltin Wealth Management is required to disclose if it accepts authority to vote client securities. Maltin Wealth Management does not vote client securities on behalf of its clients. Clients receive proxies directly from the *Financial Institutions*.

**Item 7. Client Information Provided to Portfolio Managers**

Please see response to Item 6, above.

**Item 8. Client Contact with Portfolio Managers**

Clients may contact Maltin Wealth Management, the only portfolio manager, at any time.

**Item 9. Additional Information****Disciplinary Information**

Maltin Wealth Management has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management.

**Code of Ethics**

Maltin Wealth Management and persons associated with Maltin Wealth Management ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with the Firm's policies and procedures.

Maltin Wealth Management has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). The Firm's *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by Maltin Wealth Management or any of its associated persons. The *Code of Ethics* also requires that certain of Maltin Wealth Management's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no *Access Person* may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Access Person is completed as part of a "batch trade" (where Maltin Wealth Management decides to purchase or sell the same securities for several clients including Access Persons at approximately the same time); or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Clients and prospective clients may contact Maltin Wealth Management to request a copy of its *Code of Ethics*.

### **Account Reviews**

Maltin Wealth Management monitors its clients' investment portfolios on a continuous and ongoing basis, and conducts regular account reviews at least quarterly. Such reviews are conducted by one of the Firm's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Maltin Wealth Management and to keep Maltin Wealth Management informed of any changes thereto. Maltin Wealth Management contacts ongoing investment advisory clients at least annually to review its previous services and recommendations, and to discuss the impact resulting from any changes in their financial situation and/or investment objectives.

### **Account Statements and General Reports**

Clients are provided with transaction confirmation notices and regular summary account statements directly from the *Financial Institutions*. From time to time, or as otherwise requested, Program clients may also receive written or electronic reports from Maltin Wealth Management that include account and/or market-related information, such as an inventory of account holdings and account performance. Clients should compare the account statements they receive from the *Financial Institutions* with those they receive from Maltin Wealth Management.

### **Client Referrals**

Maltin Wealth Management does not compensate any unaffiliated third-party for referring clients to the Program.

### **Receipt of Economic Benefit**

Maltin Wealth Management has arrangements in place whereby the Firm receives an economic benefit from a third-party for providing investment advice to clients participating in the Program.

Specifically, *Fidelity* may provide the Firm with computer software and related systems support, which allow Maltin Wealth Management to better monitor client accounts maintained at *Fidelity*. Maltin Wealth Management may receive the software and related support without cost because Maltin Wealth Management renders investment management services to clients that maintain assets at *Fidelity*. The software and support is not provided in connection with securities transactions of clients (i.e. not "soft dollars"). The software and related systems support may benefit Maltin Wealth Management, but not its clients directly. In fulfilling its duties to its clients, Maltin Wealth Management endeavors at all times to put the interests of its clients first. Clients should

be aware, however, that Maltin Wealth Management's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Maltin Wealth Management's choice of broker-dealer over another that does not furnish similar software, systems support, or services.

Maltin Wealth Management may receive the following benefits from *Fidelity* through the Fidelity Institutional Wealth Services Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Institutional Wealth Services Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

### **Financial Information**

Maltin Wealth Management does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Maltin Wealth Management is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Maltin Wealth Management has no disclosures pursuant to this Item.