

## **Wrap Fee Program Brochure**

### **Form ADV 2A - Appendix 1**

#### **Item 1 - Cover Page**



**CRD# 169912**

1268 Prospect Ave.  
La Jolla, CA 92037

[www.themwmgroup.com](http://www.themwmgroup.com)

(855) 696-1835

**December 19, 2014**

This brochure provides information about the qualifications and business practices of MWM 1835, LLC. If you have any questions about the contents of this brochure, please contact us at (855) 696-1835 or [contact@themwmgroup.com](mailto:contact@themwmgroup.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

MWM 1835, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about MWM 1835, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

#### **Item 2 - Material Changes**

This Wrap Brochure is prepared in the revised format required by the SEC beginning in 2011. Registered Investment Advisers are required to use this format in order to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Wrap Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any change to our policies, practices, or conflicts of interest made since our last annual update. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last filing was made on May 9, 2014. Of course the complete Brochure is available to clients at any time upon request.

### **Item 3 - Table of Contents**

### **Page**

Item 1 - Cover Page .....	1
Item 2 - Material Changes.....	1
Item 3 - Table of Contents .....	2
Item 4 - Services, Fees and Compensation .....	3
Item 5 - Account Requirements and Types of Clients.....	4
Item 6 - Portfolio Manager Selection and Evaluation .....	4
Item 7 - Client Information Provided to Portfolio Managers.....	4
Item 8 - Client Contact with Portfolio Managers .....	4
Item 9 - Additional Information.....	4
Item 10 - Requirements for State-Registered Advisers .....	4

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

MWM 1835, LLC (DBA “MWM”) was formed in 2013 and provides Financial Planning Services as well as Portfolio and Private Wealth Management Services to its clients. Such services may be offered through the “MWM Wrap Program” or the “Program,” which has been designed to simplify the payment of management fees and brokerage expenses.

The Malloy Family Trust is the principal owner of MWM. William M. Malloy, III and Shenell S. Malloy are Co-Trustees of the Trust. Please see ***Brochure Supplements***, Exhibit A, for more information on Bill Malloy as well as others who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

##### **Portfolio Management Services**

At the beginning of a client relationship, MWM meets with the client, gathers information, and performs research and analysis as necessary to develop the client’s Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by MWM based on updates to the client’s financial or other circumstances.

To implement the client’s Investment Plan, MWM will manage the client’s investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, MWM will have the authority to supervise and direct the portfolio without prior consultation with the client. Under a non-discretionary arrangement, clients must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, the client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

##### **General Fee Information**

Fees paid by clients to participate in the MWM Wrap Program generally include brokerage expenses (i.e., commissions, ticket charges, etc) as well as the management fee paid to MWM. Under the all-inclusive billing alternative, MWM will assess one client fee that captures the management, brokerage and administrative portions collectively. Please see Part 2A, ***Item 5 – Fees and Compensation*** for MWM’s fee schedule and other billing information.

Fees paid to MWM are exclusive of and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund’s prospectus or offering materials). Clients may pay certain fees in addition to the fees of the MWM Wrap Program, such as margin interest, check fees, trade-away fees, odd lot differentials and other similar types of fees. MWM Wrap Program fees which MWM does not pay to third parties in connection with transaction and execution expenses are retained by MWM. Because of this, MWM may have a disincentive to trade securities in client accounts as MWM’s overall compensation under this arrangements may be greater than it is for clients that do not participate in the Wrap Program.

The client should review all fees charged by funds, MWM and others to fully understand the total amount of fees paid by the client for investment and financial-related services. Clients participating in the MWM Wrap Program may pay higher or lower fees than clients purchasing such services

separately, depending on the cost of services if provided separately and the level of trading in a particular client's account.

#### Wrap Program Fee Information

Please see **Item 5 - Fees and Compensation** of ADV Part 2A for more information regarding the Wrap Fee Program Fees.

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

MWM serves high net worth individuals, pension and profit-sharing plans, corporations, trusts, estates and charitable organizations. While the fee for each engagement is individually negotiated, MWM generally imposes a minimum annual fee of \$5,000. Under certain circumstances and in its sole discretion, MWM may negotiate such minimums.

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

The MWM Wrap Program was designed to simplify for clients the payment of management fees and brokerage expenses. The Program does not select advisers in addition to MWM, which is the only Portfolio Manager for the Program. Please refer to additional information found in the following Items of ADV Part 2A, which accompanies this Wrap Brochure: **Item 4 - Advisory Business; Item 6 - Performance-Based Fees and Side-By-Side Management; Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss; and Item 17 - Voting Client Securities**

#### ***Item 7 - Client Information Provided to Portfolio Managers***

MWM is the only portfolio manager under the MWM Wrap Program. No information is shared with any other portfolio manager.

#### ***Item 8 - Client Contact with Portfolio Managers***

MWM is the only portfolio manager under the MWM Wrap Program. No restrictions are placed on client's ability to contact or consult with MWM.

#### ***Item 9 - Additional Information***

Neither MWM nor its Management Persons have any disciplinary disclosure required. Please see ADV Part 2A for more information in the following areas: **Item 10 - Other Financial Industry Activities and Affiliations, Item 11 - Code of Ethics, Item 13 - Review of Accounts, Item 14 - Client Referrals and Other Compensation, and Item 18 - Financial Information.**

#### ***Item 10 - Requirements for State-Registered Advisers***

Relevant information regarding the principal executive officers and management persons of MWM is provided elsewhere in this Form ADV (please see Brochure Supplements). Other than this, no disclosure is required under this item.