

# Metropolitan Wealth Management, LLC

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This Brochure provides information about the qualifications and business practices of Metropolitan Wealth Management, LLC (“Metropolitan” or “MWM”). MWM is registered as an investment adviser with the Securities and Exchange Commission (“SEC”). Please note that such registration does not imply any level of skill or training, and that the information in this Brochure has not been approved or verified by either the SEC. Additional information about MWM is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The firm’s IARD number is 170832.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may provide other information about material changes as necessary, and will provide you with a new Brochure as necessary, based on changes or new information, at any time, without charge.

If you have any questions about this Brochure, please contact us at (212) 415-6500 or [info@MWM.com](mailto:info@MWM.com).

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## Advisory Business

MWM is a privately-owned firm that is registered with the Securities and Exchange Commission as an investment advisor. The Firm provides, either directly or through specialized service providers, a range of services to its clients, each of whom are single- or multi-generational families, including discretionary investment advisory services. MWM was formed in 2014 and is owned by the principals of AR Capital.

## Compensation

MWM charges its clients a fee for investment management services, as well as the costs of providing, directly or indirectly, the various services required by its clients, including estate planning, tax and related services. Advisory fees are based upon MWM's standard fee schedule, and paid pursuant to an investment advisory agreement with each client.

## Performance-Based Fees

MWM does not currently charge performance-based fees (i.e., fees based on a share of capital gains on, or capital appreciation of, the assets of a client).

## Types of Clients

MWM provides its services to single- or multi-generational families.

## Methods of Analysis; Risk of Loss

MWM's research and advisory processes are based upon its quantitative and qualitative research approach. The risks of loss associated with MWM's research and due diligence strategies include the following:

**Market Risk.** The value of securities may move up or down, sometimes rapidly and unpredictably. The value of an investment at any point in time may be worth less than the value of the original investment, even after taking into account any reinvestment of dividends and distributions.

**Liquidity Risk.** A security may be deemed illiquid due to: (i) a lack of trading volume in the security; (ii) the security being privately placed and not traded in any public market; or (iii) being otherwise restricted from trading. Illiquid securities may be difficult to sell at the desired time or price and may lose their value. Further, certain restricted securities require special registration, liabilities and costs, and could pose valuation difficulties.

**Management Risk.** MWM's judgments about the attractiveness, value and potential appreciation of a particular real estate segment and/or security may prove to be incorrect and may not produce the desired results.

## **Disciplinary Information**

MWM has no disciplinary information to disclose.

## **Financial Industry Activities and Affiliations**

MWM is not registered in any other capacity. Certain employees of the firm may be registered representatives of Realty Capital Securities, LLC (“RCS”), a registered broker-dealer that is a Financial Industry Regulatory Authority (“FINRA”) member firm. Personnel of RCS may conduct sales activity for investment funds managed by MWM.

## **Code of Ethics**

MWM has adopted a set of policies and procedures, including a code of ethics, describing its high standard of business conduct and fiduciary duty to the firm’s clients. These policies and procedures include provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and personal securities trading procedures. All MWM personnel must acknowledge the policies and comply with the procedures. MWM will provide a copy of its code of ethics to any client or prospective client upon request.

## **Brokerage Practices**

MWM is authorized to select broker-dealers to effect transactions for the account(s) of its clients. Firms will be chosen based upon the quality of their execution and their costs, as well as (where relevant), their experience and past performance. MWM may receive certain products and services from broker-dealers in connection with client securities transactions that may be considered in choosing a particular broker-dealer to effect a transaction.

## **Review and Reporting**

MWM prepares reports on a quarterly and annual basis for transmission to clients.

## **Client Referrals**

MWM accepts, but does not pay compensation to others for, client referrals.

## **Custody**

MWM does not act as custodian for client assets. All client accounts are held at banks or independent brokerage firms that provide separate monthly or quarterly accounting directly to the client.

## **Investment Discretion**

MWM exercises discretionary investment authority for its clients pursuant to the terms of advisory agreements and/or pooled investment fund documents. In all cases, such discretion is

exercised in a manner consistent with the stated investment objectives of the particular client. When selecting securities, MWM observes the investment policies, limitations and restrictions (as amended from time to time) of the clients for which it advises.

### **Voting Client Securities**

MWM will vote proxies associated with securities held by or for the benefit of its clients pursuant to proxy voting policies adopted by the Firm.

### **Financial Information**

MWM has no financial commitments that impair its ability to meet its contractual and fiduciary commitments to clients, and has not at any time during the past ten years been the subject of a bankruptcy proceeding.

### **Privacy Statement**

MWM is committed to safeguarding the confidential information of its clients. The Firm holds all personal information provided to it in the strictest confidence, and does not disclose information to non-affiliated third parties, except as permitted by law, and does not anticipate doing so in the future.