



TRITON WEALTH MANAGEMENT

Fee-Only | Unbiased Advice | Integrity

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Firm Brochure

(Part 2A of Form ADV)

March 31, 2015

This brochure provides information about the qualifications and business practices of Triton Wealth Management, LLC ("TWM"). If you have any questions about the contents of this brochure, please contact us at (866) 880-7500 or by email at info@TritonWM.com.

TWM is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training.

Additional information about TWM and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

During 2014, TWM had no material changes to our Disclosure Brochure dated February 28, 2014.

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Advisory Services

Firm Description

Triton Wealth Management, LLC ("TWM") is organized as a Limited Liability Company ("LLC") under the laws of the State of Maryland. TWM was founded in 2008 and is owned and operated by Chief Compliance Officer and President Wayne B. Zussman.

Advisory Services Offered

TWM offers personalized confidential financial planning and investment advisory services to individuals, high net worth individuals, trusts, estates, pension and profit sharing plans, and small businesses.

Account Portfolio Management

TWM offers investment advisory solutions for its Clients. This is achieved through frequent Client contact and interaction while providing discretionary investment management and consulting services. TWM works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. TWM will then determine an appropriate portfolio, consisting of low-cost, diversified mutual funds, exchange-traded funds ("ETFs") and/or individual stocks and bonds mix to achieve the Client's investment goals.

TWM's investment strategy is primarily long-term focused, but TWM may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or as market conditions warrant. TWM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

TWM evaluates and selects ETFs, mutual funds, stocks and fixed income instruments for inclusion in Client portfolios only after applying their internal due diligence process. TWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. TWM may recommend specific positions to increase sector or asset class weightings. TWM may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. TWM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the asset classes in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Advisory Programs

TWM may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in an advisory program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment management agreement with the Program Sponsor and the participating money manager[s]. TWM will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. TWM will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add TWM's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. **TWM does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than TWM's Investment Advisory Fee (described under Fees & Compensation).**

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, TWM and its Client will agree in writing that the selected Program Sponsor will manage the Client's account on a discretionary basis.

TWM will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will TWM accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Management Agreement.

Financial Planning and Consulting Services

TWM offers a variety of financial planning services to individuals and families, pursuant to a written agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, tax planning, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. TWM may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, TWM will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, TWM may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of TWM and the interests of the Client. Clients are not obligated to implement any recommendations made by TWM or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

Additionally, TWM provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, social security benefits, education funding, annuity, and/or tax advice.

Financial Planning and Non-Investment Consulting/Implementation Services

To the extent requested by the client, TWM shall generally provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither TWM, nor any of its representatives, serves as an attorney or insurance agent, and no portion of TWM's services should be construed as same. To the extent requested by a client, TWM may recommend the services of unaffiliated professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from TWM. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Client Obligations

In performing its services, TWM shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify TWM if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising TWM's previous recommendations and/or services.

Trade Error Policy

TWM shall reimburse accounts for losses resulting from TWM trade errors, but shall not credit accounts for such errors resulting in market gains. The gains and losses are reconciled within TWM's custodial firm account and TWM retains the net gains and losses.

Client Account Management

Prior to engaging TWM to provide investment advisory services, each Client is required to enter into an Investment Management Agreement with TWM that defines the terms, conditions, authority and responsibilities of TWM and the Client. Additional data gathered may include:

- Establishing an Investment Policy Statement – TWM, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – TWM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – TWM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – TWM will provide investment management and ongoing oversight of the Client's portfolio and overall account(s).

Please Note: Retirement Rollovers-No Obligation/Conflict of Interest: A client or prospective client is under absolutely no obligation to engage TWM as the investment adviser for his/her employer sponsored retirement

account. Rather, a client can continue to self-direct his/her retirement account at his/her employer. If the client determines that he/she would like TWM's assistance, TWM shall charge a separate and additional advisory fee for its ongoing advisory services. The client will not incur this separate and additional advisory fee if he/she determines to continue to self-direct his/her account. As a result, any recommendation by TWM that a client engage TWM to manage his/her retirement account presents a conflict of interest since TWM shall derive an economic benefit from such engagement. Again, a client is under absolutely no obligation to engage TWM as the investment adviser for his/her retirement account. ANY QUESTIONS: TWM's Chief Compliance Officer, Wayne B. Zussman, remains available to address any questions that a client may have regarding its prospective engagement and the corresponding conflict of interest presented by such engagement.

Wrap Fee Programs

TWM does not manage or place Client assets into a wrap fee program, but may utilize advisory platforms as noted above. Investment management services are provided directly by TWM.

Assets Under Management

As of March 26, 2015, TWM manages approximately \$153,918,000 million of discretionary assets under management.

Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Management Agreement that details the responsibilities of TWM and the Client.

Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Management Agreement. In any partial calendar quarter, the advisory fee will be prorated based on the number of days that the Account was open during the quarter. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Accounts are billed on the following tiered fee schedule.

<u>Assets Under Management</u>	<u>Annual</u>	<u>Quarterly</u>
First \$999,999	1.2500%	0.3125%
Next \$1,000,000 to \$2,499,999	1.0000%	0.2500%
Next \$2,500,000 to \$4,999,999	0.8000%	0.2000%
Next \$5,000,000 to \$9,999,999	0.6000%	0.1500%
Then \$10,000,000 and above	0.5000%	0.1250%

TWM generally imposes a \$3,000 annual minimum fee (\$750 per quarter). However, TWM, in its sole discretion, may charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated addition of future assets, dollar amount of asset to be managed, related accounts, account composition, etc.).

Client's fees will be calculated based on the aggregate assets under management with Advisor. The designated Custodian will independently value all securities held in accounts managed by TWM. TWM will not have the authority or responsibility to value portfolio securities.

Fee Differentials

As indicated above, TWM shall price its services based upon various objective and subjective factors. As a result, TWM's clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall investment advisory and/or consulting services to be rendered. As a result of these factors, the services to be provided by TWM to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly.

Financial Planning and Consulting Services

TWM offers financial planning or consulting services on an hourly basis ranging from \$200 to \$450 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, TWM shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services as well as the time commitment involved.

Account Portfolio Management Billing

The Custodian will automatically deduct investment advisory fees from the Client account. TWM shall send a detailed report to the Custodian indicating the amount of the fees to be deducted from each Client's account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with TWM at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting TWM to be paid directly from their accounts held by the Custodian as part of the Investment Management Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services Billing

Financial planning and consulting fee are invoiced directly to the Client by TWM and are due upon receipt.

Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than TWM in connection with investments made on behalf of the Client. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by TWM is separate and distinct from these custodian and execution fees.

In addition, all fees paid to TWM for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in many of these products directly, without the services of TWM, but would not receive the services provided by TWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by TWM to fully understand the total fees to be paid.

Advance Payment of Fees and Termination

Account Portfolio Management

TWM is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Management Agreement with TWM, in whole or in part, by providing 30 days advance written notice. Clients will be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, any prepaid unearned fees will be promptly refunded and any earned, unpaid fees will be due and payable. The Client's Investment Management Agreement with TWM is non-transferable without Client's written approval.

Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate.

Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at anytime by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

Compensation for Sales of Securities

TWM does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Performance-Based Fees

TWM does not charge performance-based fees for its investment advisory services. The fees charged by TWM are as described under Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. TWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Types of Clients

TWM offers investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- Not-for-Profit Entities – charities and other non-profit organizations

The relative percentage of each type of Client is available on TWM's Form ADV Part 1. These percentages will change over time. TWM generally requires a minimum annual fee of \$3,000 for Portfolio Management Services clients. TWM may group certain related client accounts to obtain the minimum annual fee.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

TWM primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from TWM is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted previously, TWM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. TWM will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, TWM may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. TWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. TWM shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform TWM of any changes in financial condition, goals or other factors that may affect this analysis.

TWM primarily employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. TWM will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Please Note: Inverse/Enhanced Market Strategies: TWM may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct the TWM, in writing, not to employ any or all such strategies for his/her/their/its accounts.

Please Note: Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by TWM) will be profitable or equal any specific performance level(s).

Disciplinary Information

There are no legal, regulatory or disciplinary events involving TWM or any of its employees. TWM and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. To review the firm information

contained in ADV Part 1, select the option for Investment Adviser Firm and enter **132601** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Wayne Zussman by selecting the Investment Adviser Representative and entering Mr. Zussman's Individual CRD# **3250282** in the field labeled "Individual CRD Number". Information for advisory person is included below in each Form ADV 2B.

Other Financial Activities and Affiliations

TWM also provides tax preparation, bookkeeping and consulting services and may offer these services to advisory clients for an additional fee. Clients are under no obligation to utilize the tax preparation or consulting services of TWM to be an advisory client.

Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics

TWM has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with TWM. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. TWM and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of TWM associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. TWM has written its Code of Ethics to meet regulatory standards. To request a copy of our Code of Ethics, please contact us at (866) 880-7500 or via email at support@tritonwm.com.

Personal Trading and Conflicts of Interest

TWM allows employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will TWM or any associated person of TWM, transact in any security to the detriment of any Client.

Brokerage Practices

In the event that the client requests that TWM recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the TWM to use a specific broker-dealer/custodian), TWM generally recommends that investment management accounts be maintained at Fidelity. Prior to engaging TWM to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with TWM setting forth the terms and conditions under which TWM shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that the TWM considers in recommending Fidelity (or any other broker-dealer/custodian to clients) include historical relationship with TWM, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by TWM's clients shall comply with TWM's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where TWM determines, in good faith, that the commission/transaction fee is reasonable. 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 broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although TWM will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, TWM's investment management fee.

Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, TWM may receive from Fidelity (or another broker-dealer/custodian, investment manager, platform or fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist TWM to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by TWM may be investment-related research, pricing information and market data, software and other

technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by TWM in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist TWM in managing and administering client accounts. Others do not directly provide such assistance, but rather assist TWM to manage and further develop its business enterprise.

TWM's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity as a result of this arrangement. There is no corresponding commitment made by the TWM to Fidelity or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

TWM's Chief Compliance Officer, Wayne B. Zussman, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. TWM will execute its transactions through an unaffiliated broker-dealer selected by the Client. TWM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Tradeaway/Prime Broker Fees

Relative to its discretionary investment management services, when beneficial to the client, individual fixed income transactions may be effected through broker-dealers other than the account custodian, in which event, the client generally will incur both the fee (commission, mark-up/mark-down) charged by the executing broker-dealer and a separate "tradeaway" and/or prime broker fee charged by the account custodian (Fidelity).

Review of Accounts

Frequency of Reviews

Accounts are monitored on a regular basis by the Advisor assigned to the Client as well as Wayne B. Zussman, Chief Compliance Officer and President of TWM. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

Causes for Reviews

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client must notify TWM if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity at any time. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. TWM may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Client Referrals and Other Compensation

Compensation Received by TWM

TWM is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. TWM does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. TWM may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, TWM may receive referrals of new Clients from a third-party with no compensation involved.

Client Referrals from Solicitors

TWM has been fortunate to receive many client referrals over the years. Referrals come from current clients, attorneys, accountants, employees, personal friends or employees and other similar sources. TWM does not compensate referring parties for these referrals. TWM does not engage paid solicitors for Client referrals.

Custody

TWM does not accept or maintain custody of any Client assets. All Clients must place their assets with a qualified custodian. All clients receive account statements at least quarterly directly from qualified custodians, such as a bank or broker dealer that maintains those assets. For more information about custodians and brokerage practices, see Brokerage Practices above.

TWM is deemed to have limited custody as a result of their ability to be paid directly from Client accounts held by the Custodian. The Client should carefully review these account statements, and compare them to the quarterly or other reports provided by TWM. Statements provided by TWM may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. TWM urges all clients to compare statements in order to ensure that all account transactions, including deductions to pay advisory fees, remain proper, and to contact Wayne B. Zussman, Chief Compliance Officer with any questions.

Investment Discretion

TWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by TWM. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement and custodian's limited power of attorney form (typically part of the custodian's application) containing all applicable limitations to such authority. All discretionary trades made by TWM will be in accordance with each Client's investment objectives and goals.

Voting Client Securities

TWM does not accept proxy-voting responsibility for any Client. Clients are expected to vote their own proxies. Custodians (or their agents) are responsible for sending proxies to the Client.

When assistance on voting proxies is requested, TWM will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Neither TWM nor its management has any adverse financial situations that would reasonably impair the ability of TWM to meet all obligations to its Clients. Neither TWM, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. TWM is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees of \$1,200 for services to be performed six months or more in advance.

ANY QUESTIONS: TWM's Chief Compliance Officer, Wayne B. Zussman, remains available to address any questions regarding this Part 2A.

Individual Disclosure Brochure

Form ADV Part 2B

Wayne B. Zussman, MBA, CFP®, CDFA™

President and Chief Compliance Officer

March 31, 2015

This brochure supplement provides information about the background and qualifications of Wayne B. Zussman, MBA, CFP®, CDFA™, (CRD# **3250282**) that supplements the Triton Wealth Management, LLC ("TWM") brochure. You should have received a copy of that brochure. Please contact David McCormick-Goodhart, Compliance Manager if you did not receive Triton Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Zussman is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Wayne B. Zussman, MBA, CFP®, CDFA™, born in 1959, is the Founder, President and Chief Compliance Officer at Triton Wealth Management. Wayne has over eighteen years of experience in personal wealth management, advising individuals, families, estates and small business owners on a range of investment, tax and financial matters. His primary objective is to understand both the financial and personal goals of each client while developing on-going custom strategies appropriate to those goals and current market conditions.

Wayne earned his Master's in Business Administration from Pace University and holds a Bachelor of Science in Accounting from the State University of New York. He is an active member of the Financial Planning Association (FPA) and the National Association of Tax Professionals (NATP) and has met the education and experience requirements to use the CERTIFIED FINANCIAL PLANNER™ and CFP® marks by the Certified Financial Planner Board of Standards. As a CERTIFIED FINANCIAL PLANNER™, Wayne practiced initially with a fee-only financial planning firm in Virginia providing comprehensive financial planning and portfolio management advice to ultra-high net-worth individuals before venturing out on his own to form Zussman Financial Advisors in 2001, the predecessor to Triton Wealth Management.

He currently serves as the Treasurer of Talisman Therapeutic Riding, Inc., a coach to his children's various sports activities and as a member of the finance committee within his homeowners association. His community activities have included coaching for Special Olympics and volunteering within the Make-A-Wish and Juvenile Diabetes Foundations.

Wayne and his family live on the Eastern Shore of Maryland. Wayne enjoys being a father to his two boys, photography, racquetball and golf when not at the office.

Additional information regarding Mr. Zussman's recent employment history is included below.

Employer	Time Period
President and Chief Compliance Officer, Triton Wealth Management, LLC	01/08 to Present
Investment Advisor Representative, Zussman Financial Advisors	2001 to 2008
Investment Advisor Representative, Sullivan, Bruyette, Speros & Blayney	1999 to 2001

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Mr. Zussman. Neither TWM nor Mr. Zussman has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Mr. Zussman.

Securities laws require an advisor to disclose any instances where TWM or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery,

counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding TWM or Mr. Zussman.*

However, we do encourage you to independently view the background of Mr. Zussman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **3250282** in the field labeled "Individual CRD Number".

Other Business Activities

Mr. Zussman is not currently involved in any other for-profit business activities outside of TWM.

Additional Compensation

Mr. Zussman has no additional compensation outside his work with TWM.

Supervision

Mr. Zussman serves as the President and Chief Compliance Officer of TWM. Mr. Zussman can be reached at the contact information at the bottom of the page.

TWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of TWM. Further, TWM is subject to regulatory oversight by various agencies. These agencies require registration by TWM and its employees. As a registered entity, TWM is subject to examinations by regulators, which may be announced or unannounced. TWM is required to periodically update the information provided to these agencies and to provide various reports regarding business and assets of the Advisor.

Professional Certifications

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high

standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

To receive authorization to use the designation of Certified Divorce Financial Analyst™ (CDFA™), a candidate must develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts (IDFA). CDFA practitioners must pass a four-part Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process. CDFA professionals must have two years minimum experience in a financial or legal capacity prior to earning the right to use the CDFA certification mark. As a final step to certification, CDFA practitioners agree to abide by a strict code of professional conduct known as the

IDFA's Code of Ethics and Professional Responsibility, that sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA may perform a background check during this process and each candidate for CDFA certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.

Once certified, CDFA practitioners are required to maintain technical competence and fulfill ethical obligations. Every two years, they must complete a minimum of twenty (20) hours of continuing education, ten (10) of which are specifically related to the field of divorce. In addition, to the biennial continuing education requirement, all CDFA practitioners must voluntarily disclose any public, civil, criminal or disciplinary actions that may have been taken against them during the past two years as part of the renewal process.

Individual Disclosure Brochure

Form ADV Part 2B

Karen L. Baer, CSA, CDFATM

Senior Financial Advisor

March 31, 2015

This brochure supplement provides information about the background and qualifications of Karen L. Baer, CSA (CRD# 1375762) that supplements the Triton Wealth Management, LLC ("TWM") brochure. You should have received a copy of that brochure. Please contact David McCormick-Goodhart, Compliance Manager if you did not receive Triton Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Ms. Baer is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Karen L. Baer, CSA, CDFA™, born in 1965, is the Director of Operations and a Senior Financial Advisor at Triton Wealth Management.

With almost three decades of experience in the financial planning industry, Karen's experience is invaluable to providing our clients with the best service possible. As a Senior Financial Advisor she is passionate about working with divorced and widowed women and helping them transition to the next chapter in their lives.

Karen started in the financial services industry in 1986 on the ground floor—literally. Beginning in the mailroom of Texas based Southmark Financial Services, she continued to pursue her goal of becoming a Financial Advisor through the same personal determination and strong work ethic that she currently brings to each of our clients. Self-directed and highly motivated, Karen's commitment to our clients is unrivaled as she always welcomes the opportunity to assist clients with all aspects of their lives. Karen is located in our Chester office and primarily serves clients throughout Anne Arundel County and Maryland's Eastern Shore.

Karen is a devoted wife, mother and community activist. Her current community interests include serving on the Board of Directors of the Chesapeake Women's Network as well as on the Board of Crossroads Community, Inc. Additional community activities include leading her son's Cub Scout Den as Den Leader and mentoring a number of clients from the Crossroads Community. Karen lives outside of Centreville, MD on a working farm with her husband, Bob and family. She also assists Bob with his farm work, growing produce and raising cattle.

Additional information regarding Ms. Baer's recent employment history is included below.

Employer	Time Period
Financial Advisor, Triton Wealth Management, LLC	05/2010 to Present
Financial Advisor, LPL Financial, Inc.	1997 to 2010

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Ms. Baer. Neither TWM nor Ms. Baer has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Ms. Baer.

Securities laws require an advisor to disclose any instances where TWM or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

However, we do encourage you to independently view the background of Ms. Baer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left

navigation menu. Then select the option for Investment Adviser Representative and enter **1375762** in the field labeled "Individual CRD Number".

Other Business Activities

Ms. Baer is not currently involved in any other business activities outside of TWM.

Additional Compensation

Ms. Baer does not receive any additional compensation from any other business activities.

Supervision

Ms. Baer serves as a Senior Financial Advisor for TWM, under the supervision of TWM's President and Chief Compliance Officer, Wayne B. Zussman. Ms. Baer can be reached at the contact information at the bottom of the page.

TWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of TWM. Further, TWM is subject to regulatory oversight by various agencies. These agencies require registration by TWM and its employees. As a registered entity, TWM is subject to examinations by regulators, which may be announced or unannounced. TWM is required to periodically update the information provided to these agencies and to provide various reports regarding business and assets of the Advisor.

Professional Certifications

The Certified Senior Advisor (CSA®) designation is conferred by the Society of Certified Senior Advisors ("Society"). Founded in 1996 with the input of Elder Law Attorneys, CPAs, Gerontologists, Psychologists, Geriatric MD's and other senior experts.

The Society is dedicated to the ongoing education of senior issues to professionals serving the senior market.

To receive authorization to use the designation of Certified Divorce Financial Analyst™ (CDFA™), a candidate must develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts (IDFA). CDFA practitioners must pass a four-part Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process. CDFA professionals must have two years minimum

experience in a financial or legal capacity prior to earning the right to use the CDFA certification mark. As a final step to certification, CDFA practitioners agree to abide by a strict code of professional conduct known as the IDFA's Code of Ethics and Professional Responsibility, that sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA may perform a background check during this process and each candidate for CDFA certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.

Once certified, CDFA practitioners are required to maintain technical competence and fulfill ethical obligations. Every two years, they must complete a minimum of twenty (20) hours of continuing education, ten (10) of which are specifically related to the field of divorce. In addition, to the biennial continuing education requirement, all CDFA practitioners must voluntarily disclose any public, civil, criminal or disciplinary actions that may have been taken against them during the past two years as part of the renewal process.

Individual Disclosure Brochure

Form ADV Part 2B

David H. McCormick-Goodhart, MBA, CPA, CFP®

Financial Advisor

March 31, 2015

This Brochure Supplement provides information about the background and qualifications of David H. McCormick-Goodhart (CRD# 6288585) that supplements the Triton Wealth Management, LLC ("TWM") brochure. You should have received a copy of that brochure. Please contact David McCormick-Goodhart, Compliance Manager if you did not receive Triton Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. McCormick-Goodhart is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

David H. McCormick-Goodhart, MBA, CPA, CFP®, born in 1981, is a Financial Advisor at Triton Wealth Management. He works with clients to create personalized financial plans by taking their unique goals and circumstances into consideration. He is a member of Triton's Investment Committee and participates in identifying investment opportunities, monitoring portfolios, and creating portfolio management processes. He also serves as Triton's Compliance Manager.

Prior to joining Triton in October 2013, David was a tax accountant for eight years. He has extensive experience in tax return preparation and tax planning. He earned both his Master of Business Administration and Bachelor of Science in Accounting from Mount St. Mary's University. He is a member of the American Institute of Certified Public Accountants (AICPA), Maryland Association of Certified Public Accountants (MACPA), and Financial Planning Association (FPA). He is a Certified Public Accountant and a CERTIFIED FINANCIAL PLANNER™ professional.

David lives in Gaithersburg, Maryland with his wife Bethany. In his spare time he enjoys exploring new restaurants and traveling with Bethany.

Additional information regarding Mr. McCormick-Goodhart's recent employment history is included below.

Employer	Time Period
Financial Advisor, Triton Wealth Management, LLC	10/2013 to Present
Senior Tax Accountant, Cardoni Waddell, LLC	05/2011 to 10/2013
Tax Accountant, Dembo, Jones, Healy, Pennington & Marshall, PC	05/2005 to 05/2011

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Mr. McCormick-Goodhart. Neither TWM nor Mr. McCormick-Goodhart has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Mr. McCormick-Goodhart.

Securities laws require an advisor to disclose any instances where TWM or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

However, we do encourage you to independently view the background of Mr. McCormick-Goodhart on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 6288585 in the field labeled "Individual CRD Number".

Other Business Activities

Mr. McCormick-Goodhart is not currently involved in any other business activities outside of TWM.

Additional Compensation

Mr. McCormick-Goodhart does not receive any additional compensation from any other business activities.

Supervision

Mr. McCormick-Goodhart serves as a Financial Advisor and Compliance Manager for TWM, under the supervision of TWM's President and Chief Compliance Officer, Wayne B. Zussman. Mr. McCormick-Goodhart's contact information is at the bottom of this page.

TWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of TWM. Further, TWM is subject to regulatory oversight by various agencies. These agencies require registration by TWM and its employees. As a registered entity, TWM is subject to examinations by regulators, which may be announced or unannounced. TWM is required to periodically update the information provided to these agencies and to provide various reports regarding business and assets of the Advisor.

Professional Certifications

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign

university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.