

# Efficient Wealth Partners, LLC d/b/a Dumont Wealth Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Efficient Wealth Partners LLC. If you have any questions about the contents of this brochure, please contact us at (917) 310-3442 or by email at: [inquires@dumontwealth.com](mailto:inquires@dumontwealth.com). 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 Efficient Wealth Partners LLC d/b/a Dumont Wealth LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Efficient Wealth Partners LLC d/b/a Dumont Wealth's CRD number is: 291981.*

1 Rockefeller Plaza, 11th Floor  
New York, NY 10020  
(917) 310-3442  
[inquires@dumontwealth.com](mailto:inquires@dumontwealth.com)  
<https://dumontwealth.com>

*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Dumont Wealth on March 28, 2019 are described below. Material changes relate to Dumont Wealth's policies, practices or conflicts of interests.

- Dumont Wealth has updated their email address and website address. (Cover page)
- Dumont Wealth has added Item 19 to the brochure.
- Dumont Wealth has updated Item 12.A(3) to disclose "DW may permit clients to direct it to execute transactions through a specified broker-dealer."

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Efficient Wealth Partners LLC d/b/a Dumont Wealth (hereinafter "DW") is a Limited Liability Company organized in the State of New York. The firm was formed in December 2017, and the principal owner is Brian Stephen Dumont.

### **B. Types of Advisory Services**

#### *Portfolio Management Services*

DW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. DW creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- |                       |                                |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy   |
| • Asset allocation    | • Asset selection              |
| • Risk tolerance      | • Regular portfolio monitoring |

DW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

DW seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of DW's economic, investment or other financial interests. To meet its fiduciary obligations, DW attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, DW's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is DW's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

DW may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, DW will always ensure those other advisers are properly licensed or registered as an investment adviser. DW conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. DW then makes investments with a third-party investment adviser by referring the client to the third-party adviser. These investments may be allocated either through the third-party adviser's fund or through a separately managed

account managed by such third party adviser on behalf of DW's client. DW may also allocate among one or more private equity funds or private equity fund advisers. DW will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

### ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

### ***Services Limited to Specific Types of Investments***

DW generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities and private placements, although DW primarily recommends moderate growth. DW may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

DW offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent DW from properly servicing the client account, or if the restrictions would require DW to deviate from its standard suite of services, DW reserves the right to end the relationship.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. DW does not participate in any wrap fee programs.

## **E. Assets Under Management**

DW has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$6,081,643.00	\$0.00	December 2018

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

Total Assets Under Management	Annual Fees
On the first \$2,000,000	1.50%
On the next \$3,000,000	1.25%
On the next \$5,000,000	1.00%
On assets over \$10,000,000	0.75%

The balance in the client's account on the last day of the prior billing period is used to determine the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of DW's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 10 days' written notice.

#### *Performance-Based Fees*

In the case of a private placement investment made pursuant to DW's recommendation by a client who is a Qualified Client, DW charges a performance fee on the funds invested as a percentage of profits received by the client that are not a return of principal invested. Said profits may be in the form of dividends or other cash compensation to the client. The fee is generally between 10-25% of profits received by the client that is not a return of principal invested. The fee is negotiable and shall be set forth in the agreement between EWP and the client. This performance fee is to be paid to DW directly by the fund or its agent or from the client, beginning any time after the principal sum is invested and continuing for the life of the fund. The frequency of performance fees paid will correspond to the client's distributions from the fund, such as monthly, quarterly or annually, or periodically in arrears. DW reserves the right to verify distributions with the fund.

Alternatively, if a client sells or transfers their fund shares, the new owner or entity is responsible for ongoing performance fee payment to DW going forward. In cases where this may not be possible, DW will share in the capital gains profits realized during the sale, according to the rate of the dividend share, generally between 10-25%.

In addition, DW charges an initial fee for asset allocation and due diligence on private placement investments. This fee is a one-time fixed fee for advisory services on specified

private placement funds and is generally between 2-5% of the total investment, depending on the complexity of the due diligence process for the particular private placement. The fee is negotiable and shall be set forth in the agreement between DW and client.

### ***Selection of Other Advisers Fees***

DW will receive its standard fee on top of the fee paid to the third party adviser. This relationship will be memorialized in each contract between DW and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

DW may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time. This service may be canceled with 30 days' notice.

### ***Financial Planning Fees***

#### **Fixed Fees**

The fixed rate for creating client financial plans is between \$1,000 and \$50,000.

#### **Hourly Fees**

The hourly fee for these services is between \$500 and \$750.

Clients may terminate the agreement without penalty, for full refund of DW's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

### ***Payment of Performance-Based Fees***

Performance-based fees are paid by the private placement fund, it's agent, or by the client. The frequency of performance fees paid will correspond to the client's distributions from the fund and will be paid in arrears.

### ***Payment of Selection of Other Advisers Fees***

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.



### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

Hourly financial planning fees are paid in arrears upon completion.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by DW. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

DW collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither DW nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

DW manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) as well as accounts that are NOT billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because DW or its supervised persons have an incentive to favor accounts for which DW and its supervised persons receive a performance-based fee. DW addresses the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. DW seeks best execution and upholds its fiduciary duty for all clients.

Clients that are paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

## **Item 7: Types of Clients**

DW generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is an account minimum of \$1,000,000, which may be waived by DW in its discretion.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

DW's methods of analysis include Charting analysis and Modern portfolio theory.

**Charting analysis** involves the use of patterns in performance charts. DW uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

DW uses long term trading.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck

data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### *Investment Strategies*

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Although DW will seek to select only money managers who will invest clients' assets with the highest level of integrity, DW's selection process cannot ensure that money managers will perform as desired and DW will have no control over the day-to-day operations of any of its selected money managers. DW would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term

goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Hedge funds** often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Private equity** funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither DW nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither DW nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Brian Stephen Dumont is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. DW always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of DW in connection with such individual's activities outside of DW.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

DW may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay DW its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between DW and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. DW will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. DW will ensure that all recommended advisers are licensed or notice filed in the states in which DW is recommending them to clients.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

DW has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. DW's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

DW and its related persons have material financial interests in issuers of securities that DW recommends for purchase by its clients. DW or its related persons invest in private placements it recommends to certain clients.

This presents a conflict of interest in that DE or its related persons may receive more compensation from investment in a security in which in which DW or a related person has a material financial interest than from other investments. Client approval will be sought for client investment in such recommendations and, if granted, such approval will be binding. DW always acts in the best interest of the client consistent with its fiduciary duties and clients are not required invest in such investments if they do not wish to do so.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of DW may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of DW to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. DW will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of DW may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of DW to buy or sell securities before or after recommending securities to clients resulting in

representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, DW will never engage in trading that operates to the client's disadvantage if representatives of DW buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on DW's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

DW will recommend clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

#### ***1. Research and Other Soft-Dollar Benefits***

DW does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

#### ***2. Brokerage for Client Referrals***

DW receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

DW may permit clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to DW to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

DW does not trade client's accounts or recommend broker/custodians, and therefore does not direct brokerage.



## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for DW's advisory services provided on an ongoing basis are reviewed at least Quarterly by Brian S Dumont, Managing Partner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at DW are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Brian S Dumont, Managing Partner. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, DW's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of DW's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

DW participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. DW receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, DW participates in TD Ameritrade's institutional advisor program and DW may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between DW's participation in the Program and the investment advice it gives to its clients, although DW receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving DW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have DW's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to DW by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by DW's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit DW but may not benefit its client accounts. These products or services may assist DW in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help DW manage and further develop its business enterprise. The benefits received by DW or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, DW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by DW or its related persons in and of itself creates a conflict of interest and may indirectly influence the DW's choice of TD Ameritrade for custody and brokerage services.

#### **B. Compensation to Non – Advisory Personnel for Client Referrals**

DW may enter into written arrangements with third parties to act as solicitors for DW's investment management services. Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. DW will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-3 under the Advisers Act, where applicable.

### **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, DW will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

DW does not have discretion over client accounts at any time.

### **Item 17: Voting Client Securities (Proxy Voting)**

DW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

DW neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

#### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither DW nor its management has any financial condition that is likely to reasonably impair DW's ability to meet contractual commitments to clients.

#### **C. Bankruptcy Petitions in Previous Ten Years**

DW has not been the subject of a bankruptcy petition in the last ten years.

### **Item 19: Requirements For State Registered Advisers**

#### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

DW currently has only one management person/executive officer: Brian Stephen Dumont. Education and business background can be found on the Form ADV Part 2B brochure supplement for such individual.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the individual's Form ADV Part 2B brochure supplement.

### **C. How Performance-based Fees are Calculated and Degree of Risk to Clients**

DW accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client.

In the case of a private placement investment made pursuant to DW's recommendation by a client who is a Qualified Client, DW charges a performance fee on the funds invested as a percentage of profits received by the client that are not a return of principal invested. Said profits may be in the form of dividends or other cash compensation to the client. The fee is generally between 10-25% of profits received by the client that is not a return of principal invested. The fee is negotiable and shall be set forth in the agreement between EWP and the client. This performance fee is to be paid to DW directly by the fund or its agent or from the client, beginning any time after the principal sum is invested and continuing for the life of the fund. The frequency of performance fees paid will correspond to the client's distributions from the fund, such as monthly, quarterly or annually, or periodically in arrears. DW reserves the right to verify distributions with the fund.

Alternatively, if a client sells or transfers their fund shares, the new owner or entity is responsible for ongoing performance fee payment to DW going forward. In cases where this may not be possible, DW will share in the capital gains profits realized during the sale, according to the rate of the dividend share, generally between 10-25%.

In addition, DW charges an initial fee for asset allocation and due diligence on private placement investments. This fee is a one-time fixed fee for advisory services on specified private placement funds and is generally between 2-5% of the total investment, depending on the complexity of the due diligence process for the particular private placement. The fee is negotiable and shall be set forth in the agreement between DW and client.

Clients that are paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at DW or DW has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.