

# **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 25, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Essex Private Wealth Management is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Essex Private Wealth Management to assist you in determining whether to retain the Advisor.

Additional information about Essex Private Wealth Management and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 149991.

**Essex Private Wealth Management, LLC**  
**6 Park Street, Topsfield, MA 01983**  
**Phone: (978) 887-5981**  
**<https://www.essexprivate.com>**

## **Item 2 – Material Changes**

---

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of Essex Private Wealth Management. For convenience, we have combined these documents into a single disclosure document.

Essex Private Wealth Management believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Essex Private Wealth Management encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### **Material Changes**

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor offers 3(38) Retirement Plan Services, please see Item 4.B for additional information.
- The Advisor may engage and compensate unaffiliated third party referral sources for Client referrals. Please see Item 14.B for additional details.
- The Advisor may have custody of Client assets. Please see Item 15 for additional information.
- The Advisor has changed their firm name on December 10, 2018 from Huntwicke Advisors, LLC to Essex Private Wealth Management, LLC.

### **Future Changes**

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Essex Private Wealth Management.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with our firm name or our CRD# 149991. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

### Item 3 – Table of Contents

<b>Item 1 – Cover Page</b> .....	<b>1</b>
<b>Item 2 – Material Changes</b> .....	<b>2</b>
<b>Item 3 – Table of Contents</b> .....	<b>3</b>
<b>Item 4 – Advisory Services</b> .....	<b>4</b>
A. Firm Information.....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	6
D. Wrap Fee Programs .....	6
E. Assets Under Management .....	6
<b>Item 5 – Fees and Compensation</b> .....	<b>6</b>
A. Fees for Advisory Services .....	6
B. Fee Billing.....	7
C. Other Fees and Expenses.....	7
D. Advance Payment of Fees and Termination .....	8
E. Compensation for Sales of Securities.....	8
<b>Item 6 – Performance-Based Fees</b> .....	<b>8</b>
<b>Item 7 – Types of Clients</b> .....	<b>9</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>9</b>
A. Methods of Analysis.....	9
B. Risk of Loss .....	10
<b>Item 9 – Disciplinary Information</b> .....	<b>10</b>
<b>Item 10 – Other Financial Activities and Affiliations</b> .....	<b>11</b>
<b>Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading</b> .....	<b>11</b>
A. Code of Ethics .....	11
B. Personal Trading with Material Interest .....	11
C. Personal Trading in Same Securities as Clients .....	11
D. Personal Trading at Same Time as Client.....	11
<b>Item 12 – Brokerage Practices</b> .....	<b>12</b>
A. Recommendation of Custodian[s].....	12
B. Aggregating and Allocating Trades.....	13
<b>Item 13 – Review of Accounts</b> .....	<b>13</b>
A. Frequency of Reviews .....	13
B. Causes for Reviews.....	13
C. Review Reports .....	13
<b>Item 14 – Client Referrals and Other Compensation</b> .....	<b>13</b>
A. Compensation Received by Essex Private Wealth Management .....	13
B. Client Referrals from Solicitors .....	14
<b>Item 15 – Custody</b> .....	<b>14</b>
<b>Item 16 – Investment Discretion</b> .....	<b>14</b>
<b>Item 17 – Voting Client Securities</b> .....	<b>14</b>
<b>Item 18 – Financial Information</b> .....	<b>14</b>
<b>Form ADV 2B – Brochure Supplements</b> .....	<b>16</b>
<b>Privacy Policy</b> .....	<b>37</b>

## **Item 4 – Advisory Services**

---

### **A. Firm Information**

Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Massachusetts. Essex Private Wealth Management was founded in 2009 by Brian A. Woodland (Managing Member) and is owned by Huntwicke Capital Group, Inc., the parent company and operated by Mr. Woodland and Peter E. Mullholland (Chief Investment Officer and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Essex Private Wealth Management.

### **B. Advisory Services Offered**

Essex Private Wealth Management offers advisory services to individuals, high net worth individuals, trusts, estates, retirement plans and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

Essex Private Wealth Management may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services in connection with discretionary management of investment portfolios. These services are described below.

#### Investment Management Services

Essex Private Wealth Management provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing both discretionary and non-discretionary investment management services. Essex Private Wealth Management works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. Essex Private Wealth Management will then construct a portfolio primarily consisting of mutual funds and exchange-traded funds (“ETFs”). In addition, from time-to-time, Essex Private Wealth Management may utilize individual stocks and bonds, U.S. government securities, inverse ETFs and other investments as necessary to achieve the Client’s investment goals. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Essex Private Wealth Management’ investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Essex Private Wealth Management 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.

Essex Private Wealth Management evaluates and selects investments for inclusion in Client portfolios only after applying their internal due diligence process. Essex Private Wealth Management may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Essex Private Wealth Management may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Essex Private Wealth Management 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 position[s] 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.

All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 - Custody.

#### Financial Planning Services

Essex Private Wealth Management will typically provide a variety of financial planning services to individuals and families, as a part of its wealth management services or pursuant to a written financial planning 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 may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, 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. Essex Private Wealth Management may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor 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 recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor 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 implement the transaction through the Advisor.

#### Retirement Plan Advisory Services

Essex Private Wealth Management provides advisory services on behalf of company retirement plans (each a "Plan") and the company/sponsor (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

These services are provided by Essex Private Wealth Management serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). The Advisor may serve as either a 3(21) Fiduciary (non-discretionary) or a 3(38) Fiduciary, assuming investment discretion over Plan assets. In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Essex Private Wealth Management's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

### C. Client Account Management

Prior to engaging Essex Private Wealth Management to provide investment advisory services, each Client is required to enter into one or more advisory agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Essex Private Wealth Management, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Essex Private Wealth Management will develop a strategic asset allocation investment strategy that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Essex Private Wealth Management will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Essex Private Wealth Management will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

Essex Private Wealth Management does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Essex Private Wealth Management.

### E. Assets Under Management

As of December 31, 2018, Essex Private Wealth Management manages the following assets:

Discretionary Assets	\$332,931,102
Non-Discretionary Assets	\$5,327,251
<b>Total Assets Under Management</b>	<b>\$338,258,353</b>

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more advisory agreements that detail the responsibilities of Essex Private Wealth Management and the Client.

### A. Fees for Advisory Services

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined fee for investment management and financial planning services based on the market value of assets under management.

#### Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the advisory agreement. Fees are based on the market value of assets under management at the end of the prior quarter. Advisory fees range from 1.00% to 0.50% based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
First \$500,000	1.00%
Next \$500,000	0.80%
Next \$2,000,000	0.70%
Next \$1,000,000	0.60%
Next \$1,000,000	0.50%
Over \$5,000,000	Negotiable

Certain Clients, including legacy Clients, may have a fee schedule and billing methodology that differs from above. The advisory fee in the first quarter of service is prorated to the inception date of the account[s] to the end of the first quarter. At the end of the first quarter, the Client is billed for the first quarter's prorated fee as well as the next quarter's fee. Fees are negotiable at the sole discretion of the Advisor. In addition, the Client may be billed at a fixed fee rather than a percentage of assets under management. At no time will the fixed fee exceed the annual rate disclosed in the fee schedule disclosed above.. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Essex Private Wealth Management will be independently valued by the Custodian. Essex Private Wealth Management will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

Essex Private Wealth Management offers standalone financial planning services on an hourly basis at a rate of \$150 per hour. Fees may be negotiable depending on the nature and complexity of each Client's circumstances. Fees will be based on the complexity of the service that is anticipated to be necessary for the Client. An estimate for total hours and overall cost will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.00%, billed quarterly in advance, pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the calendar quarter. Fees are negotiable based on the size and complexity of the Plan.

### **B. Fee Billing**

#### Investment Management Services

Advisory fees for investment management will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] 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 Essex Private Wealth Management at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the 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 advisory fees to be deducted by Essex Private Wealth Management directly from their accounts held by the Custodian as part of the advisory agreement and separate account forms provided by the Custodian. If so desired, the Client may choose to be billed directly by Essex Private Wealth Management for fees.

#### Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement with the remaining balance due upon the completion of the engagement deliverable[s].

#### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Essex Private Wealth Management, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The advisory fee charged by Essex Private Wealth Management is separate and distinct from these custody and execution fees.

In addition, all fees paid to Essex Private Wealth Management for advisory services are separate and distinct from the expenses charged by mutual funds and ETFs 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 may be able to invest in these products directly, without the services of Essex Private Wealth Management, but would not receive the services provided by Essex Private Wealth Management which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Essex Private Wealth Management to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Management Services

Essex Private Wealth Management is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, 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. Upon termination, any unearned, prepaid advisory fees will be refunded to the Client. The Client's advisory agreement with the Advisor is non-transferable without the Client's prior consent.

##### Financial Planning Services

Essex Private Wealth Management may be partially compensated for its financial planning services before commencing the engagement. Either party may terminate a planning agreement, at any time, by providing written notice to the other party within five (5) business days of signing the Advisor's financial planning agreement. Upon termination, 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. Any unearned, prepaid fees will be refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

##### Retirement Plan Advisory Services

Essex Private Wealth Management is compensated for its retirement plan advisory services in advance of the quarter in which services are rendered. Either party may terminate the retirement plan advisory agreement at any time, by providing advance written notice to the other party. Upon termination, 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 and the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the calendar quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Essex Private Wealth Management does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons are also registered representatives of Huntwicke Securities, LLC ("Huntwicke Securities") an affiliated broker-dealer. Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In one's separate capacity as a registered representative of Huntwicke Securities, an Advisory Person may implement securities transactions under Huntwicke Securities and not through Essex Private Wealth Management. In such instances, an Advisory Person and certain members of the Advisor's management will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because an Advisory Person who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.



## **Item 6 – Performance-Based Fees**

---

Essex Private Wealth Management does not charge performance-based fees for its investment advisory services. The fees charged by Essex Private Wealth Management are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Essex Private Wealth Management 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.

## **Item 7 – Types of Clients**

---

Essex Private Wealth Management provides advisory services to individuals, high net worth individuals, trusts, estates, retirement plans and charitable organizations. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Essex Private Wealth Management generally requires a minimum relationship size of \$50,000, which may be reduced at the sole discretion of the Advisor.

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

---

### **A. Methods of Analysis**

Essex Private Wealth Management employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Essex Private Wealth Management are 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.

*Mutual fund analysis* reviews all current mutual fund holdings for the firm in addition to, individual account[s] for share class conversions for suitability towards the Client goals. There the Advisor will then identify the fund family funds with the institutional or the Advisor share class availability. The Advisor monitors these funds to determine if the Client would benefit from a share class conversion.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts."

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

As noted above, Essex Private Wealth Management generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Essex Private Wealth Management 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, Essex Private Wealth Management 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.

## **B. 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. Essex Private Wealth Management 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[s]. The Advisor 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 the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events involving Essex Private Wealth Management or any of its Supervised Persons.** Essex Private Wealth Management values 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 available on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with our firm name or our CRD# 149991.

## **Item 10 – Other Financial Activities and Affiliations**

---

### **Broker-Dealer Affiliation**

As noted in Item 5.E., Advisory Persons of Essex Private Wealth Management also serve as registered representatives of Huntwicke Securities. In an Advisory Person's separate capacity as a registered representative, one will typically receive commissions for the implementation of recommendations for commissionable transactions. Due to common ownership, Mr. Woodland may receive compensation. Clients are not obligated to implement any recommendation provided by any Advisory Persons. Neither the Advisor nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in one's separate capacity as a registered representative.

### **Huntwicke Capital Group Inc.**

Mr. Woodland is the President of Huntwicke Capital Group Inc. (herein "HCG"). This is a holding company to several real estate properties throughout the Commonwealth of Massachusetts. Mr. Woodland is solely compensated from HCG on a salary basis. The Advisor nor Mr. Woodland does not offer or recommend Clients to invest in these properties owned by HCG. Mr. Woodland spends less than 10% of his time in this position.

## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

---

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

The Advisor has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with the Advisor (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. The Advisor and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of the Advisor associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (978) 887-5981 or via email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

### **B. Personal Trading with Material Interest**

The Advisor allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Essex Private Wealth Management does not act as principal in any transactions. In addition, the Advisor does not advise an investment company. Essex Private Wealth Management does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

The Advisor allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that 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 a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of Essex Private Wealth Management may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Essex Private Wealth Management requiring reporting of personal securities trades, by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While the Advisor allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades are typically aggregated with Client orders or traded afterwards. **At no time, will the Advisor or any Supervised Person, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

---

### A. Recommendation of Custodian[s]

Essex Private Wealth Management does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Essex Private Wealth Management to direct trades to the Custodian as agreed in the investment advisory agreement. Further, Essex Private Wealth Management does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Essex Private Wealth Management does not exercise discretion over the selection of the Custodian, the Advisor may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Essex Private Wealth Management. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Essex Private Wealth Management may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, reputation and/or location of the Custodian's offices. Essex Private Wealth Management does not receive research services, other products, or compensation as a result of recommending a particular broker-dealer/custodian that may result in the Client paying higher commissions than those obtainable through other broker-dealer/custodians. Essex Private Wealth Management typically recommends to Clients that they established their brokerage account[s] at Fidelity Clearing & Custody Solutions, a division of Fidelity Investments, Inc. (collectively "Fidelity"). Fidelity is independent and unaffiliated SEC-registered broker-dealers and FINRA members. Fidelity offers independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Essex Private Wealth Management receives certain benefits from Fidelity through its participation in the program.

Essex Private Wealth Management assists certain Clients with the management of 529 Plans. In these instances, Essex Private Wealth Management generally recommends and invests Clients assets in the American Funds or Fidelity.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. Essex Private Wealth Management does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain benefits from Fidelity, as detailed in Item 14 below.

**2. Brokerage Referrals** - Essex Private Wealth Management does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Essex Private Wealth Management will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian, unless otherwise directed by the Client. Under these circumstances, the direction by a Client to execute trades with a particular Custodian means that the Advisor does not have the ability to choose the price of the security traded or the commission paid. The result could be higher commissions, greater spreads or less favorable net prices, than if the Advisor was empowered to negotiate commission rates or spreads freely, or to select brokers or dealers based on best execution.

To address the conflicts with regards to the limitations of client-directed brokerage with respect to best execution, the Advisor will provide full and accurate disclosures within the Advisory Agreement and Disclosure Brochure. Additionally, the Advisor conducts ongoing best execution due diligence to ensure its Custodian recommendation is in the best interest of the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Essex Private Wealth Management will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. 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 Custodian. Essex Private Wealth Management will execute its transactions through the Custodian as authorized by the Client, unless otherwise directed in writing by the Client. Essex Private Wealth Management may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian 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.

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by the Advisory Persons. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more 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[s]. The Client is encouraged to notify Essex Private Wealth Management 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.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the 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. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

---

### **A. Compensation Received by Essex Private Wealth Management**

#### Huntwicke Securities, LLC

Mr. Woodland is a registered representative and owner of Huntwicke Securities of Topsfield, MA. Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Woodland will typically receive commissions for the implementation of recommendations for commissionable transactions.

#### Participation in Institutional Advisor Platform

Essex Private Wealth Management has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants;



access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### **B. Client Referrals from Solicitors**

Essex Private Wealth Management may engage and compensate unaffiliated third party referral sources (a “solicitor”) for Client referrals. Clients will not pay a higher fee to Essex Private Wealth Management as a result of such payments to a solicitor. The Advisor shall enter into an agreement with the solicitor, which requires that full disclosure of the compensation and other conflicts is provided to the prospective client prior to or at the time of entering into the advisory agreement.

### **Item 15 – Custody**

---

All Clients must maintain their accounts with a “qualified custodian” as described in item 12. Essex Private Wealth Management accepts custody of a Client's funds or securities, through the deduction of management fees from the Client's account[s] at the Custodian, and in certain situations where a Supervised Person of Essex Private Wealth Management may have access to a Client's held-away account login credentials. The Advisor may also serve as trustee to certain accounts for which they provide investment advisory services. Essex Private Wealth Management's capacity as trustee gives custody over advisory accounts for which the Advisor serves as trustee.

Clients will receive account statements at least quarterly and generally monthly from the Custodian. You are urged to compare the Custodian account statements against statements prepared by Essex Private Wealth Management for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custody statement is the official record of your account for tax purposes. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

#### **Surprise Independent Examination**

As Essex Private Wealth Management is deemed to have custody over certain Client accounts and/or securities as part of their access to Client login credentials, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which Essex Private Wealth Management maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

### **Item 16 – Investment Discretion**

---

Essex Private Wealth Management may have 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 Essex Private Wealth Management. 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 advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Essex Private Wealth Management will be in accordance with each Client's investment objectives and goals.

Under limited circumstances, Essex Private Wealth Management may manage accounts on a non-discretionary basis. In these instances, Essex Private Wealth Management provides recommendations to Clients and if recommendations are approved, Essex Private Wealth Management will implement in accordance with the Client's instructions.

### **Item 17 – Voting Client Securities**

---

Essex Private Wealth Management does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

---

Essex Private Wealth Management, LLC  
6 Park Street, Topsfield, MA 01983  
Phone: (978) 887-5981  
<https://www.essexprivate.com>

## **Item 18 – Financial Information**

---

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



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Brian A. Woodland  
Managing Member**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brian A. Woodland (CRD# **2263508**) in addition to the information contained in the Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Woodland is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2263508.

## Item 2 – Educational Background and Business Experience

---

Brian A. Woodland, born in 1971, is the Managing Member of Essex Private Wealth Management. Mr. Woodland earned Bachelors Finance from the University of Massachusetts in 1993. Additional information regarding Mr. Woodland's employment history is included below.

### Employment History:

Managing Member, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	03/2009 to Present
Registered Representative and Managing Member, Huntwicke Securities, LLC	02/2008 to Present
President, Huntwicke Capital Group, Inc.	02/2008 to Present
Winslow, Evans & Crocker, Inc.	09/2005 to 04/2006
Salomon Smith Barney	07/2000 to 09/2005
Woodland Asset Management	03/2006 to 06/2008

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Essex Private Wealth Management or Brian A. Woodland.*** Neither Essex Private Wealth Management nor Mr. Woodland has ever been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Essex Private Wealth Management or Mr. Woodland.

Securities laws require an advisor to disclose any instances where the advisor 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 Essex Private Wealth Management or Mr. Woodland.***

However, we do encourage you to independently view the background of Mr. Woodland on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with his full name or his CRD# 2263508.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Woodland also serves as a registered representative and Managing Member of Huntwicke Securities, LLC ("Huntwicke Securities"). Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In his separate capacity as registered representative, Mr. Woodland will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Woodland. Neither the Advisor nor Mr. Woodland will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative where commissions are also earned.

### Huntwicke Capital Group Inc.

Mr. Woodland is the President of Huntwicke Capital Group Inc. (herein "HCG"). This is a holding company to several real estate properties throughout the Commonwealth of Massachusetts. Mr. Woodland is solely compensated from HCG on a salary basis. The Advisor nor Mr. Woodland does not offer or recommend Clients to invest in these properties owned by HCG. Mr. Woodland spends less than 10% of his time in this position.

Ipswich Brewery Partners, LLC

Mr. Woodland is a managing member of Ipswich Brewery Partners, LLC. He is a part owner of this property. This is a commercial property in downtown Ipswich, MA. This requires less than 2 hours per month of their time.

### **Item 5 – Additional Compensation**

---

Mr. Woodland receives additional compensation from his business activities listed in Item 4 above.

### **Item 6 – Supervision**

---

Mr. Woodland serves as the Managing Member of Essex Private Wealth Management and is also supervised by Peter Mulholland, the Chief Compliance Officer.. Mr. Mulholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.

# **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Peter E. Mulholland  
Chief Investment Officer, Chief Compliance Officer**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Peter E. Mulholland (CRD# **2213796**) in addition to the information contained in the Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”) Group Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Mulholland is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2213796.

## Item 2 – Educational Background and Business Experience

---

Peter E. Mulholland is the Chief Investment Officer and Chief Compliance Officer of Essex Private Wealth Management. Mr. Mulholland, born in 1969, is dedicated to advising Client of Essex Private Wealth Management. Mr. Mulholland earned a B.A. from the University of New Hampshire in 1991. Additional information regarding Mr. Mulholland's employment history is included below.

### Employment History:

Chief Investment Officer, Chief Compliance Officer, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	04/2009 to Present
Registered Representative, Huntwicke Securities, LLC	05/2017 to Present
Registered Representative, Phalanx Trading, LLC	04/2009 to 01/2016
Relationship Manager, Portfolio Advisory Services, Fidelity Strategic Advisors	01/1992 to 04/2009

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Essex Private Wealth Management or Peter Earl Mulholland.*** Neither Essex Private Wealth Management nor Mr. Mulholland has ever been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Essex Private Wealth Management or Mr. Mulholland.

Securities laws require an advisor to disclose any instances where the advisor 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 Essex Private Wealth Management or Mr. Mulholland.*** However, we do encourage you to independently view the background of Mr. Mulholland on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov> by searching with his full name or his CRD# 2213796.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Mulholland is also a registered representative of Huntwicke Securities, LLC ("Huntwicke Securities"). Huntwicke Securities is a registered broker-dealer (CRD# 146993), member FINRA, SIPC. In Mr. Mulholland's separate capacity as a registered representative, Mr. Mulholland will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Mulholland. Neither the Advisor nor Mr. Mulholland will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Mulholland's separate capacity as a registered representative.

### Town of Topsfield

Mr. Mulholland also works for the Town of Topsfield as an Animal Inspector. As an Animal Inspector, his role is to collect the town census for the farms in Topsfield each fall. This is a part-time role where he spends 1-2 hours per week, mostly on the weekends.

### Other Business

Mr. Mulholland lives on a working farm and works on the farm outside of business hours.

## Item 5 – Additional Compensation

---

Mr. Mulholland receives additional compensation from his business activities listed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Mulholland serves as the Chief Compliance Officer of Essex Private Wealth Management. Mr. Mullholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**David E. Bunker  
President**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David E. Bunker (CRD# 2986602) in addition to the information contained in the Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”, CRD# 149991) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Essex Private Wealth Management Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Bunker is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2986602.



## Item 2 – Educational Background and Business Experience

---

David E. Bunker, born in 1963, is dedicated to advising Clients of Essex Private Wealth Management as the President. Mr. Bunker earned a Graduate Certificate in Financial Planning from Bentley University in 1998. Mr. Bunker also earned a Masters Degree in Finance and Financial Management Services from Bentley University in 1997. Mr. Bunker earned a Bachelor of Science in Finance from Syracuse University in 1985. Additional information regarding Mr. Bunker's employment history is included below.

### Employment History:

President, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	08/2018 to Present
President, Essex Financial Advisors, Inc.	01/1998 to 02/2019
Investment Advisor, Sentinel Pension Advisors, Inc.	01/1998 to 12/2000
Investment Advisor, Sentinel Investment Group, Inc.	01/1998 to 12/2000

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Bunker.*** Mr. Bunker has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Bunker. Securities laws require an advisor to disclose any instances where the advisor 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 Mr. Bunker.***

However, we do encourage you to independently view the background of Mr. Bunker on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2986602.

## Item 4 – Other Business Activities

---

Ipswich Brewery Partners, LLC

Mr. Bunker is a managing member of Ipswich Brewery Partners, LLC. He is a part owner of this property. This is a commercial property in downtown Ipswich, MA. This requires less than 2 hours per month of their time.

## Item 5 – Additional Compensation

---

Mr. Bunker receives additional compensation from his business activities listed in Item 4 above.

## Item 6 – Supervision

---

Mr. Bunker serves as the President of Essex Private Wealth Management and is supervised by Peter Mulholland, the Chief Compliance Officer. Mr. Mulholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**James D. Baga  
Senior Financial Advisor**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James D. Baga (CRD# **1691122**) in addition to the information contained in the Essex Private Wealth Management, LLC formerly Huntwicke Advisors, LLC (“Essex Private Wealth Management” or the “Advisor”, CRD # 149991) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Essex Private Wealth Management Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Baga is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1691122.

## Item 2 – Educational Background and Business Experience

---

James D. Baga, born in 1963, is dedicated to advising Clients of Essex Private Wealth Management as a Senior Financial Advisor. Mr. Baga earned a Bachelor of Science in Finance from Northeastern University in 1987. Additional information regarding Mr. Baga's employment history is included below.

### Employment History:

Senior Financial Advisor, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	08/2016 to Present
Registered Representative, Huntwicke Securities, LLC	08/2016 to Present
VP Private Client Group, Sentinel Pension Advisors Inc.	10/2013 to 08/2016
Planning and Guidance Consultant, Fidelity Investments Institutional Services Company, Inc.	11/1993 to 09/2013

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Baga.*** Mr. Baga has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Baga. Securities laws require an advisor to disclose any instances where the advisor 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 Mr. Baga.*** However, we do encourage you to independently view the background of Mr. Baga on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1691122.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Baga also serves as a registered representative of Huntwicke Securities, LLC ("Huntwicke Securities"). Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In his separate capacity as registered representative, Mr. Baga will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Baga. Neither the Advisor nor Mr. Baga will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative where commissions are also earned.

## Item 5 – Additional Compensation

---

Mr. Baga receives additional compensation from his business activities listed in Item 4 above.

## Item 6 – Supervision

---

Mr. Baga serves as the Senior Financial Advisor of Essex Private Wealth Management and is supervised by Peter Mulholland, the Chief Compliance Officer. Mr. Mulholland can be reached at (978) 887-5981. Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Dennis C. Wassung, Jr., CFA®**  
**Portfolio Manager**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Dennis C. Wassung, Jr., CFA® (CRD# 4127189) in addition to the information contained in the Essex Private Wealth Management, LLC formerly Huntwicke Advisors, LLC (“Essex Private Wealth Management” or the “Advisor”, CRD# 149991) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Essex Private Wealth Management Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Wassung is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4127189.

## Item 2 – Educational Background and Business Experience

---

Dennis C. Wassung, Jr., CFA®, born in 1972, is dedicated to advising Clients of Essex Private Wealth Management as a Portfolio Manager. Mr. Wassung earned a B.S. in Mechanical Engineering from Rensselaer Polytechnic Institute in 1994. Mr. Wassung also earned a MBA from University of Southern California in 1998. Additional information regarding Mr. Wassung's employment history is included below.

### Employment History:

Portfolio Manager, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	01/2017 to Present
Registered Representative, Huntwicke Securities, LLC	02/2018 to Present
Portfolio Manager, Cabot Wealth Management	06/2008 to 10/2016
Research Analyst, Canaccord Genuity	10/1999 to 01/2008

### Chartered Financial Analyst ("CFA®")

The Chartered Financial Analyst ("CFA®") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Wassung.*** Mr. Wassung has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Wassung.

Securities laws require an advisor to disclose any instances where the advisor 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 Mr. Wassung.*** However, we do encourage you to independently view the background of Mr. Wassung on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4127189.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Wassung also serves as a registered representative of Huntwicke Securities, LLC ("Huntwicke Securities"). Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In his separate capacity as registered representative, Mr. Wassung will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Wassung. Neither the Advisor nor Mr. Wassung will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative where commissions are also earned.

## Item 5 – Additional Compensation

---

Mr. Wassung receives additional compensation from his business activities listed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Wassung serves as a Portfolio Manager of Essex Private Wealth Management and is supervised by Peter Mulholland, the Chief Compliance Officer. Mr. Mulholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Lionel J. Edmonson, CFP®**  
**Financial Advisor**

**Effective: March 23, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Lionel J. Edmonson, CFP® (CRD# 4731762) in addition to the information contained in the Essex Private Wealth Management, LLC formerly Huntwicke Advisors, LLC (“Essex Private Wealth Management” or the “Advisor”, CRD# 149991) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Essex Private Wealth Management Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Edmonson is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4731762.



## Item 2 – Educational Background and Business Experience

Lionel J. Edmonson, CFP<sup>®</sup>, born in 1977, is dedicated to advising Clients of Essex Private Wealth Management as a Financial Advisor. Mr. Edmonson earned a Bachelor of Arts in Business Administration from Texas Tech University in 2000. Additional information regarding Mr. Edmonson's employment history is included below.

### Employment History:

Financial Advisor, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	09/2017 to Present
Registered Representative, Huntwicke Securities, LLC	09/2017 to Present
Director Retirement Planner, Fidelity Investments	02/2007 to 09/2017

### CERTIFIED FINANCIAL PLANNER<sup>™</sup> ("CFP<sup>®</sup>")

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

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> 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 71,000 individuals have obtained CFP<sup>®</sup> certification in the United States.

To attain the right to use the CFP<sup>®</sup> 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<sup>®</sup> 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<sup>®</sup> 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<sup>®</sup> Certification Examination. The examination 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<sup>®</sup> Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> 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<sup>®</sup> 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<sup>®</sup> professionals provide financial planning services at a fiduciary standard of care. This means CFP<sup>®</sup> professionals must provide financial planning services in the best interests of their clients.

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

### Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Edmonson.*** Mr. Edmonson has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Edmonson.

Securities laws require an advisor to disclose any instances where the advisor 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 Mr. Edmonson.***

However, we do encourage you to independently view the background of Mr. Edmonson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4731762.

### Item 4 – Other Business Activities

---

#### Broker-Dealer Affiliation

Mr. Edmonson is also a registered representative of Huntwicke Securities, LLC (“Huntwicke Securities”). Huntwicke Securities is a registered broker-dealer (CRD# 146993), member FINRA, SIPC. In Mr. Edmonson’s separate capacity as a registered representative, Mr. Edmonson will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Edmonson. Neither the Advisor nor Mr. Edmonson will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Edmonson’s separate capacity as a registered representative.

### Item 5 – Additional Compensation

---

Mr. Edmonson has additional business activities that are detailed in Item 4 above.

### Item 6 – Supervision

---

Mr. Edmonson serves as a Financial Advisor of Essex Private Wealth Management and is supervised by Peter Mulholland, the Chief Compliance Officer. Mr. Mulholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor’s supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Robert Rubano  
Financial Advisor**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert Rubano (CRD# 6430413) in addition to the information contained in the Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC and herein “Essex Private Wealth Management” or the “Advisor”, CRD# 149991) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Essex Private Wealth Management Disclosure Brochure or this Brochure Supplement, please contact us at (978) 887-5981 or by email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).

Additional information about Mr. Rubano is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6430413.

---

**Essex Private Wealth Management, LLC**  
6 Park Street, Topsfield, MA 01983  
Phone: (978) 887-5981  
<https://www.essexprivate.com>

## Item 2 – Educational Background and Business Experience

---

Robert Rubano, born in 1965, is dedicated to advising Clients of Essex Private Wealth Management as a Financial Advisor. Mr. Rubano earned an MBA, Finance from Boston University in 1995. Mr. Rubano also earned a Bachelor of Arts from Bowdoin College in 1987. Additional information regarding Mr. Rubano's employment history is included below.

### Employment History:

Financial Advisor, Essex Private Wealth Management, LLC (formerly Huntwicke Advisors, LLC)	08/2018 to Present
Registered Representative, Huntwicke Securities, LLC	09/2018 to Present
Senior Director, Risk Management, John Hancock/Manulife Asset Management	06/2017 to 08/2018
Senior Consultant, John Hancock/Manulife Asset Management	11/2016 to 06/2017
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	12/2014 to 11/2016
Various: Portfolio Accountant to Managing Director, State Street Global Advisors	06/1987 to 10/2013

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Mr. Rubano.*** Mr. Rubano has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rubano.

Securities laws require an advisor to disclose any instances where the advisor 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 Mr. Rubano.***

However, we do encourage you to independently view the background of Mr. Rubano on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6430413.

## Item 4 – Other Business Activities

---

### Broker-Dealer Affiliation

Mr. Rubano also serves as a registered representative of Huntwicke Securities, LLC ("Huntwicke Securities"). Huntwicke Securities is a registered broker-dealer (CRD No. 146993), member FINRA, SIPC. In his separate capacity as registered representative, Mr. Rubano will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Rubano. Neither the Advisor nor Mr. Rubano will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative where commissions are also earned.

Mr. Rubano owns several real estate properties. Clients are not tenants of the rental properties owned by Mr. Rubano.

## Item 5 – Additional Compensation

---

Mr. Rubano has additional business activities that are detailed in Item 4 above.

## **Item 6 – Supervision**

---

Mr. Rubano serves as a Financial Advisor of Essex Private Wealth Management and is supervised by Peter Mulholland, the Chief Compliance Officer. Mr. Mulholland can be reached at (978) 887-5981.

Essex Private Wealth Management has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Essex Private Wealth Management. The Advisor has established procedures, and a system for applying the procedures, which would reasonably be expected to prevent and detect, insofar as practicable, any such violation by a person subject to the Advisor's supervision. Further, Essex Private Wealth Management is subject to regulatory oversight by various agencies. These agencies require registration by Essex Private Wealth Management and its Supervised Persons. As a registered entity, Essex Private Wealth Management is subject to examinations by regulators, which may be announced or unannounced. Essex Private Wealth Management is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

---

**Effective:** March 25, 2019

### Our Commitment to You

Essex Private Wealth Management, LLC formerly Huntwicke Advisors, LLC ("Essex Private Wealth Management") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Essex Private Wealth Management (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Essex Private Wealth Management provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That Essex Private Wealth Management Shares

Essex Private Wealth Management works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Essex Private Wealth Management' regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

### Information About Former Clients

Essex Private Wealth Management does not disclose, and does not intend to disclose, non-public personal

information to non-affiliated third parties with respect to persons who are no longer our Clients.

### **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

### **State-specific Regulations**

Massachusetts	In response to a Massachusetts law, Clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
---------------	---

### **We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (978) 887-5981 or via email at [pmulholland@essexprivate.com](mailto:pmulholland@essexprivate.com).