



Brochure - Form ADV Part 2A

Prometheus Wealth Management
24 Boulevard Princesse Charlotte
98 000 Monaco

E-mail: contact@prometheus-wm.com
www.prometheus-wm.com
Phone: +377 99 99 75 75
CRD. No.: 332503



1. Cover Page

This Form ADV Part 2A/Brochure provides information about the qualifications and business practices of Prometheus Wealth Management (“Prometheus Wealth Management”). Prometheus Wealth Management is registered as an investment adviser with the United States Securities and Exchange Commission (the “SEC”). If you have any questions about the content of this brochure, please contact us by phone at +377 99 99 75 75 or by e-mail at contact@prometheus-wm.com.

The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Additional information about Prometheus Wealth Management is also available on the SEC’s website at www.adviserinfo.sec.gov.

This document is not, and is not intended to be, a marketing brochure, nor is it to provide detailed information about all aspects of Prometheus Wealth Management’s business. Registration as an investment adviser with the SEC does not imply a specific level of skill or training. Prometheus Wealth Management requires its employees to have a high level of experience and education.

This Brochure provides information for U.S. clients of Prometheus Wealth Management.

This Brochure has been prepared on September 05, 2024.

2. Material Changes

Prometheus Wealth Management is a SEC-registered investment advisor, and this is Prometheus Wealth Management’s narrative brochure prepared in accordance with Part 2A of Form ADV.



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4. Advisory Business

Prometheus Wealth Management, a corporation based in Monaco, provides investment advisory services to clients with connections to the United States of America (“USA”). Prometheus Wealth Management was formed in 2018. The main shareholder of the company is H2O Asset Management, with 50.01% shares, no physical person holds more than 25% of the capital.

Prometheus Wealth Management provides investment supervisory services primarily for individuals and companies. The services provided include the provision of discretionary portfolio management and investment advice in line with the client’s constraints and investment profile. Investment supervisory services are provided based on the individual needs and investment objectives of each client as communicated to Prometheus Wealth Management. Specifically, the structure for each client’s investment portfolio is created by taking into account certain considerations such as expected returns, risk tolerance and future liquidity requirements.

Prometheus Wealth Management offers investment management and advisory services on the following types of securities and transactions: exchange-listed securities, securities traded over-the-counter, sovereign and corporate debt securities (and other commercial paper), certificates of deposit, investment company securities such as mutual funds, exchange traded funds, private investment funds, foreign exchange transactions, commodities and futures contracts on intangibles. Prometheus Wealth Management offers services which include the evaluation, selection and monitoring of investments.

Discretionary Asset Management Services

Under a discretionary management mandate, Prometheus Wealth Management has the authority to supervise and select investments of and for each client’s account generally in line with the investment profile agreed with the client and without prior consultation with the client. Prometheus Wealth Management determines which securities are bought and sold for the account and the total amount of the purchases and sales. Prometheus Wealth Management’s authority may be subject to special conditions imposed by individual clients. For example, a client may restrict or prohibit transactions in certain types of securities. Prometheus Wealth Management does not select the broker or dealer for executing securities transactions and does not negotiate the commission rates paid to execute transactions.

Non-Discretionary (i.e. Advisory) Asset Management Services

Under a non-discretionary management mandate, Prometheus Wealth Management makes investment recommendations to a client, and the client subsequently makes all investment decisions about the investments held in the account. In order to implement the client’s decisions, the client may authorize Prometheus Wealth Management to place orders for the execution of securities transactions for the client’s account. In such cases, Prometheus Wealth Management does not select the broker or dealer used for executing such securities transactions and does not negotiate the commission rates paid.

Prometheus Wealth Management will place orders with the custodian bank or broker directed by the client. Related to its primary function as a wealth manager, Prometheus Wealth Management may offer clients certain broad guidance commonly considered as financial planning. Prometheus Wealth Management does not vote proxies on behalf of clients.



Prometheus Wealth Management has approximately USD 900'000'000 under management as of December 31, 2023. All of the assets under management are managed both on a discretionary and non-discretionary (i.e. advisory) basis.

5. Fees and Compensation

Prometheus Wealth Management charges investment advisory fees for its services consisting of a percentage of the market value of assets under management. The fixed asset management fee for discretionary management, which is the default compensation scheme, is deducted quarterly from the client's custodian account. The fee is based upon the market value of the assets in the account on the last business day of the previous quarter. No fees are deducted in advance.

Typically, depending on the size of assets under management, Prometheus Wealth Management charges between 0.75% and 1.25% per annum.

Prometheus Wealth Management may waive, discount and/or negotiate fees at its discretion.

Fees charged by Prometheus Wealth Management do not include custodian fees, brokerage commissions and other transaction costs, or any other fee imposed by the custodian bank or the broker, such as stamp duties, local taxes or other fees charged by third-party entities or regulatory authorities. The custodian fees will include, amongst others fees, the bank's mark-up on any foreign currencies exchanged in the account and on any exchange of physical gold. Prometheus Wealth Management does not charge its investment advisory fee in advance of performing its services.

Prometheus Wealth Management relies on the custodian banks, selected by its clients, to value the assets in the respective client accounts, and to compute its investment advisory fees based on these valuations provided by the custodian. On a quarterly basis, Prometheus Wealth Management performs reasonable checks to confirm that the valuations used by the custodian are correct. After the end of each quarter Prometheus Wealth Management arranges with the custodian for the direct payment of its fee from the respective client accounts. The client's statement from the custodian bank will show all amounts debited to the account, including the amount of any advisory fee paid to Prometheus Wealth Management. The investment performance expressed in percentage points will therefore be slightly higher than the actual performance after taking into account the cost for advisory services.

Prometheus Wealth Management is exclusively compensated by the fee paid by the client and does not receive undisclosed remuneration from third parties in relation to its investment advisory services. In the case that any remuneration would be received by Prometheus Wealth Management from third parties and if such remuneration is permitted by regulatory provisions this will be disclosed to the client, otherwise this will be credited against Prometheus Wealth Management's investment advisory fees. Clients should also refer to item 12 of this brochure where brokerage practices are discussed.

6. Performance-Based Fees and Side-by-Side Management

In addition to a standard management fee Prometheus Wealth Management may charge the client a performance fee based on individual agreements with the client. The amount charged typically is calculated based on a portfolio's outperformance on a pre-determined absolute return according to the client investment profile. Although the specific performance fee schedule that Prometheus Wealth Management negotiates with a client may vary, the standard performance fee generally ranges from



15% to 20% of performance above the pre-determined absolute return. The performance fee is based on the *high-water mark* mechanism. According to this mechanism, the performance fee will be charged to the client if and only if the value of the portfolio on the last trading day of the year, adapted to the deposits and withdrawals operated during the period of reference, is superior to the highest of the portfolio's value noticed on the last day of each previous trading day exercise, adapted to the deposits and withdrawals operated during the period of reference, since the implementation of the mandate.

7. Types of Clients

Prometheus Wealth Management offers investment management services to individuals, corporations, trusts, foundations, and other entities. Generally, Prometheus Wealth Management intends its client to have a minimum of USD \$1,000,000 of assets under management. Prometheus Wealth Management may accept accounts below the minimum requirements, or may retain accounts that have dropped below this minimum requirement due to changes in asset prices. Accounts that have family, corporate or other relationships may be aggregated for purposes of the minimum account requirement.

8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Prometheus Wealth Management's active investment strategy seeks to generate sustainable long-term investment results through a combined focus on capital appreciation and capital preservation. In its efforts to minimize risk, Prometheus Wealth Management actively seeks to maintain a sufficient level of asset diversification and degree of capital exposure.

Prometheus Wealth Management's investment management process is based on analysis of conditions and factors such as global economic cycles, geo-political developments, business trends, market conditions, and securities valuations. Using a top-down analytical approach, Prometheus Wealth Management constructs and optimizes asset allocations with a focus on diversification across asset classes, regions, sectors, and instruments. A further bottom-up analysis is conducted to identify and analyse eligible securities under consideration for investment.

Prometheus Wealth Management utilizes its own proprietary information and research methodology in conjunction with external and third-party research and analytical tools. Prometheus Wealth Management's investment strategy is continually reviewed and asset allocations are monitored on a regular basis to ensure alignment with investment goals and risk management.

In making the decision as to which securities are to be purchased or sold and the amounts thereof, Prometheus Wealth Management is guided by the general guidelines, set up at the inception of the adviser client relationship in cooperation with the client, and a periodic review of the asset allocation. These general guidelines cover such matters as the relative proportion of debt and equity securities to be held in the portfolio, the degree of risk, which the client wishes to assume, and the types and amounts of securities to be held in the portfolio.

Prometheus Wealth Management's authority may be further limited by specific instructions from the client which may restrict or prohibit transactions in certain securities. Prometheus Wealth Management may manage numerous accounts with similar or identical investment objectives or may manage accounts



with different objectives that may trade in the same securities. Despite such similarities, portfolio decisions relating to client investments and the performance resulting from such decisions may differ from client to client. Prometheus Wealth Management will not necessarily purchase or sell the same securities at the same time or in the same proportionate amounts for all eligible clients, particularly if different clients have selected different investment profiles, have materially different amounts of capital under management with Prometheus Wealth Management or different amounts of investable cash available. In certain instances, such as purchases of less liquid publicly traded securities or oversubscribed public offerings, it may not be possible or feasible to allocate a transaction pro rata to all eligible clients, especially if clients have materially different sized portfolios. Therefore, not all clients will necessarily participate in the same investment opportunities or participate on the same basis.

Investment Strategies

Clients may choose from the following investment strategies according to their individual investment goals and risk tolerance:

Conservative Strategy

The strategy seeks to generate distributable income while targeting moderate market risk by investing in a diversified multi-asset class portfolio. This investment strategy allocates capital to global bonds and interest rate instruments, and secondary to global equities. This strategy may allocate capital to assets and investment strategies that enhance distributable income and/or mitigate portfolio risk. This strategy is intended for income-oriented investors.

The principal material risks to this strategy are interest rate and credit risk, equity market and company specific risk. Changes in interest rates and/or changes to credit status can cause the value of fixed-income instruments to fluctuate in value. Rising interest rates and/or deteriorating credit status might cause the value of fixed income securities to fall. Equity market volatility and/or company specific events can cause the equity instruments to fluctuate in value. Selling pressure in equity markets and/or negative company specific events might cause the value of equity securities to fall. See discussion below of Material Investment Risks.

Balanced Strategy

The strategy seeks to preserve and grow capital while targeting below average market risk by investing in a diversified multi-asset class portfolio. The investment strategy primarily allocates capital dynamically to global equity, global bonds, global commodities, and global interest rates. The strategy may allocate capital to assets and investment strategies that mitigate portfolio risk. The strategy is intended for investors with a wealth preservation focus.

The principal material risks to this strategy are interest rate and credit risk, equity market and company specific risk, and macroeconomic- and geopolitical risk. Changes in interest rates and/or changes to credit status can cause the value of fixed-income instruments to fluctuate in value. Rising interest rates and/or deteriorating credit status might cause the value of fixed income securities to fall. Equity market volatility and/or company specific events can cause the equity instruments to fluctuate in value. Selling pressure in equity markets and/or negative company specific events might cause the value of equity securities to fall. Alternating macroeconomic and geopolitical environments can cause the

commodities to fluctuate in value. Supply and demand disruptions, political disputes, sanctions, and/or warfare might cause the value of commodities to fall. See discussion below of Material Investment Risks.

Growth Strategy

The strategy seeks long term capital growth while targeting comparable market risk by investing in a diversified multi-asset class portfolio. The investment strategy allocates the majority of capital to global equities and a subset of capital to global bonds. The strategy may allocate capital to assets and investment strategies that mitigate portfolio risk. The strategy is intended for growth-oriented investors.

The principal material risks to this strategy are equity market and company specific risk, interest rate and credit risk. Equity market volatility and/or company specific events can cause the equity instruments to fluctuate in value. Selling pressure in equity markets and/or negative company specific events might cause the value of equity securities to fall. Changes in interest rates and/or changes to credit status can cause the value of fixed-income instruments to fluctuate in value. Rising interest rates and/or deteriorating credit status might cause the value of fixed income securities to fall. See discussion below of Material Investment Risks.

Taylor Made Strategy

A tailor-made strategy could also be implemented according to specific requests, constraints or objectives defined by the customer. This strategy allows an investor to allocate up to 100% of his assets in any kind of asset classes and it is associated with a high volatility and therefore a high risk of losing capital. Nevertheless, when market conditions require so, Prometheus Wealth Management has the possibility, to reduce or to advise to reduce substantially the risk exposure in favour to other asset classes considered more conservative.

Material Investment Risks

Clients should be aware that investing in securities involves the risk of losing capital. Among other risks, investments will be subject to market risk, liquidity risk, interest rate risk, credit risk, and counterparty risk. Other risks include, but are not limited to: event risk due to unfavourable political and economic developments as well as events adversely affecting a specific company or particular industry, and risks involving movements in the currency and commodity markets.

Past performance should not be taken as an indication or guarantee for future results. In certain cases, Prometheus Wealth Management may acquire structured products or derivatives within the context of its discretionary asset management mandate.

In addition to the risks that apply to all investments in securities, investing and engaging in derivative instruments and transactions may involve different types of risk and possibly greater levels of risk. These risks include, but are not limited to the following:

- ***Leverage.*** A derivative instrument or transaction may have the effect of disproportionately increasing an account's exposure to the market for the securities or other assets underlying the derivative

position. Leverage will tend to magnify both the positive impact of successful investment and the negative impact of unsuccessful investment on an account's performance.

- *Counterparty Credit Risk.* An account's ability to profit from a derivative contract depends on the ability and willingness of the other party to the contract ("Counterparty") to perform its obligations under the contract. Although exchange-traded futures and options contracts are generally backed by a guarantee from a clearing corporation, an account could lose the benefit of a contract in the unlikely event that the clearing corporation becomes insolvent. The counterparty's obligations under a forward contract, over-the-counter option, swap or other over-the-counter derivative contract are not so guaranteed. If the counterparty to an over-the-counter contract fails to perform its obligations, an account may lose the benefit of the contract and may have difficulty reclaiming any collateral that an account may have deposited with the counterparty.
- *Lack of Correlation.* The market value of a derivative position may correlate imperfectly with the market price of the asset underlying the derivative position. To the extent that a derivative position is being used to hedge against changes in the value of assets in an account, a lack of price correlation between the derivative position and the hedged asset may result in an in-complete hedge.
- *Illiquidity.* Over-the-counter derivative contracts are usually subject to restrictions on transfer, and there is generally no liquid market for these contracts. Although it is often possible to negotiate the termination of an over-the-counter contract or enter into an offsetting contract, the counterparty may be unable or unwilling to terminate a contract with an account, especially during times of market instability or disruption. The markets for many exchange-traded futures, options and other instruments are quite liquid during normal market conditions, but this liquidity may disappear during times of market instability or disruption.
- *Less Accurate Valuation.* The absence of a liquid market for over-the-counter derivatives increases the likelihood of the client's custodian bank not being able to correctly value these interests.

9. Disciplinary Information on Prometheus Wealth Management

Neither Prometheus Wealth Management nor its management and employees have been involved in any legal or disciplinary events.

10. Other Financial Industry Activities and Affiliations

Prometheus Wealth Management and its management or personnel are neither registered nor have an application pending to register as broker-dealers, registered representatives of a broker-dealer, futures commission merchants, commodity pool operators, commodity trading advisors, or associated persons of the foregoing entities.

Prometheus Wealth Management is a member of the Monaco Association for Financial Activities (AMAF) and regulated by the Financial Activities Supervisory Commission (CCAF) in Monaco under the agreement SAF/2017-09.



In compliance with the statutory provisions of the Monaco Association for Financial Activities (AMAF) Prometheus Wealth Management has joined an ombudsman scheme. In the event of a disagreement, client has the option of initiating mediation proceedings with the ombudsman by contacting:

Monaco Association for Financial Activities (AMAF)

4 rue des Irias, BP540

98015 Monaco Cedex

Monaco

Phone: + 377 98 98 43 59

<http://www.ccaf.mc>

H2O AM, one of Prometheus Wealth Management's shareholders is also a fund manager. H2O AM has no U.S. clients. Prometheus Wealth Management does not intend to recommend any investments sponsored by H2O AM. Prometheus Wealth Management has identified any conflicts of interest arising with respect to the affiliated company.

11. Code of Ethics, Participation in Client Transactions and Personal Trading

Prometheus Wealth Management believes that its fee-only advisory business model significantly reduces the potential for conflicts of interest between Prometheus Wealth Management and its clients. Prometheus Wealth Management seeks to minimize such conflicts of interest and resolve those conflicts of interests in favour of the client to the extent it determines reasonable and necessary in accordance with its Code of Ethics.

Code of Ethics

Prometheus Wealth Management has adopted a Code of Ethics (the "Code"), relevant policies, and procedures governing personal securities transactions by its staff. The Code also provides guidance and instruction to Prometheus Wealth Management and its personnel on their ethical obligations in fulfilling its duties of loyalty, fairness and good faith towards the clients. The overriding principle of Prometheus Wealth Management's Code of Ethics is that all employees of Prometheus Wealth Management owe a fiduciary duty to clients for whom Prometheus Wealth Management acts as investment adviser. Employees of Prometheus Wealth Management are responsible for conducting personal trading activities in a manner that does not interfere with a client's portfolio transactions or take improper advantage of a relationship with any client. The Code contains sections including, but not limited to, the following key areas: (i) restrictions on personal investing activities; (ii) gifts and business entertainment; and (iii) outside business activities.

Prometheus Wealth Management has designated a Chief Compliance Officer responsible for maintaining, reviewing and enforcing Prometheus Wealth Management's Code of Ethics and corresponding policies and procedures. When Prometheus' staff invests on a personal basis, the interests of clients must be placed ahead of the staff's own financial interests at all times. All personal securities transactions by these persons must be conducted in accordance with the Code of Ethics and in a manner to avoid any actual or potential conflict of interest or any abuse of any person's position of trust and responsibility. Furthermore, these persons should not take inappropriate advantage of their positions with or on behalf



of a client. Prometheus Wealth Management will provide a copy of the Code of Ethics to any client or prospective client upon request.

12. Brokerage Practices

Prometheus Wealth Management does not have custody or possession of client assets; each of Prometheus Wealth Management's clients maintains custody of its assets at one or more custodian banks selected by the client. Each custodian bank acts as a broker-dealer itself and/or maintains relationships with designated broker-dealers (including potentially an affiliate of the custodian bank). Securities transactions are executed through the custodian or the broker or dealer designated by the custodian bank selected by the client. Under no circumstances will Prometheus Wealth Management act as a broker-dealer for its clients' accounts nor will it charge or receive, directly or indirectly, any portion of the transactional fee charged by the client's broker-dealer.

Prometheus Wealth Management does not guarantee best execution or the best brokerage commissions because Prometheus Wealth Management does not control these factors. Prometheus Wealth Management makes best efforts to assure that custodian banks, in executing client's trades, weigh the characteristics of the client and the financial instruments involved in light of: the best possible price, the probability of complete execution and handling of orders, the promptness of complete execution and handling, the security of handling, and the range and type of the desired services. Prometheus Wealth Management operates exclusively on this directed brokerage basis whereby the client and/or the client's choice of custodian bank selects the broker-dealer to be used for securities transactions. Therefore, clients should be aware of the following:

- Prometheus Wealth Management does not negotiate commission rates with broker-dealers with whom orders are placed either directly or via the custodian bank because the broker-dealer is determined by the custodian bank and/or the client. The applicable commissions and fees charged for securities transactions are agreed upon between the client and the custodian bank when the client accepts the applicable commission schedule published by the custodian bank or otherwise agrees.
- Commission charges will vary among clients and best execution may not be guaranteed by Prometheus Wealth Management.

Because the client selects the custodian bank and thereby the broker-dealer to be used for securities transactions involving its account, different clients may have accounts at the same custodian bank or a single client may have multiple accounts at different custodian banks. Therefore, a client may pay an executing broker a higher commission for a securities transaction than might be charged by another broker-dealer executing the same transaction or the commission charged by the broker-dealer executing a similar transaction for another client of Prometheus Wealth Management. Commission charges may also vary between clients. It also is possible that the broker-dealer used for transactions may not be a registered broker-dealer under the U.S. Securities Exchange Act of 1934, as amended (the "Exchange Act").

Use of Soft Dollars

Prometheus Wealth Management does not presently have any arrangements pursuant to which it receives research or other products and benefits from a broker-dealer or third party in connection with



Client securities transactions (“*soft dollar benefits*”). However, to the extent it may have them in the future, Prometheus Wealth Management will enter into such arrangements only in accordance with the conditions of the safe harbor provided by Section 28(e) of the Exchange Act. Section 28(e) provides a “*safe harbor*” that permits an investment manager to use commissions or “*soft dollars*” to obtain research and brokerage services which constitute research and brokerage within the meaning of Section 28(e).

Trade Errors

It is Prometheus Wealth Management’s duty to handle client orders with the highest level of care. Nonetheless, it is possible a trading error can occur. In this case once an error is recognized, the person responsible for the error, or spotting it, must immediately notify the Chief Executive Officer (“CEO”) or the Chief Compliance Officer (“CCO”). The person responsible for placing the order should attempt to cancel the trade prior to settlement. This should be done in a manner to minimize risk of financial loss. If it is not possible to cancel the trade, the transaction should be reversed as soon as possible. If the latter scenario would not be in the best interest of the Client, the CEO or CCO will determine whether the reversal of the trade should be delayed or what other course of action to take. Prometheus Wealth Management will correct any trade error promptly with the objective to place any affected account in the same position it would have been in, had the error not occurred. The party responsible for the error will bear the gain or the loss resulting of the error and all associated costs to reverse the error.

Aggregation of client transactions

Prometheus Wealth Management will work with custodian banks to aggregate trades for client accounts at that bank, if such trading will be of advantage to the clients. It is not expected that such aggregations would affect brokerage commission rates.

13. Review of Accounts

All managed accounts are reviewed by the Chief Investment Officer (“CIO”) at least quarterly in order to ensure that they remain in agreement with the client’s investment strategy and Prometheus Wealth Management’s prevailing asset allocation for the relevant investment strategy as part of Prometheus Wealth Management’s investment and investment control process.

Various other circumstances (for example, substantial international political changes, significant market developments, unusual exchange rate movements) may result in additional reviews of accounts. When necessary, accounts may be rebalanced based on Prometheus Wealth Management’s tactical asset allocations.

Prometheus Wealth Management provides written quarterly investment performance reports to clients containing cash balances and all securities holdings as well as the sources of performance of the individual client account.

14. Client Referrals and Other Compensation

Prometheus Wealth Management is compensated by the advisory fees paid by its clients. Prometheus Wealth Management’s policy is not to accept compensation from third parties relating to referrals. To



the extent Prometheus Wealth Management receives a referral fee for an investment it recommends, it will reduce the fees owed by the respective client to Prometheus Wealth Management or will credit the respective client's account for the applicable amount.

Prometheus Wealth Management may pay fees for client referrals. Prometheus Wealth Management may execute a solicitation agreement with a third party for client referrals and share the advisory fee paid by the client with the third party. Clients will be informed of such an agreement in writing before the Client signs a contract with Prometheus Wealth Management and Clients will be asked to consent to the agreement. Such arrangements comply with the conditions and requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940.

Prometheus Wealth Management's employees or associated persons may be invited to attend seminars and meetings with the costs associated with such meetings borne by a sponsoring brokerage firm or other party extending the invitation. Any affiliated solicitor of Prometheus Wealth Management will be required to disclose the nature of his/her relationship to prospective clients at the time of the solicitation and must provide all prospective clients with a copy of Prometheus Wealth Management's written disclosure statement at the time of the solicitation.

15. Custody

Prometheus Wealth Management's clients will authorize their custodian banks to deduct its fees from the client's account at the bank. Apart from this, Prometheus Wealth Management does not exercise any sort of custody over clients' accounts. Prometheus Wealth Management client accounts are held at qualified custodian banks in a separate account for each client. The client establishes the bank account directly and therefore is aware of the qualified custodian's name, address and the manner in which investments are maintained. Account statements are prepared by the custodian bank and delivered directly to the client or the client's representative at least quarterly. Clients should carefully review these statements and when they have questions contact either Prometheus Wealth Management or the custodian bank. The custodian bank also provides the client with all required year-end tax information.

16. Investment Discretion

Prometheus Wealth Management may have discretionary authority to manage client accounts as described above. Clients may limit the authority by which Prometheus Wealth Management may act by placing any form of investment restrictions on this authority in writing. In the context of a discretionary mandate, Prometheus Wealth Management will assume discretionary authority only after a wealth management agreement and the power of attorney have been duly executed. Prometheus Wealth Management never has discretionary authority to select a qualified custodian for a client's account.

17. Voting Client Securities

Prometheus Wealth Management does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Prometheus Wealth Management may provide advice to clients regarding the clients' voting of proxies.



18. Financial Information

Prometheus Wealth Management has not been the subject of a bankruptcy petition at any time nor does it anticipate or foresee such petition taking place.

Prometheus Wealth Management is not required to provide financial statements as part of this Brochure because it does not require or solicit prepayment of any fees from Clients.