

Total Wealth Planning and Management, Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Total Wealth Planning and Management, Inc. If you have any questions about the contents of this brochure, please contact us at (866) 568-0003 or by email at: richard.tomes@totalwpm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Total Wealth Planning and Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Total Wealth Planning and Management, Inc.'s CRD number is: 166664

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

Version Date: 04/24/2024

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Total Wealth Planning and Management, Inc. on 03/05/2024 are described below. Material changes relate to Total Wealth Planning and Management, Inc.'s policies, practices or conflicts of interests.

- Total Wealth Planning and Management, Inc. has updated its mailing box address (cover page).

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Item 4: Advisory Business

A. Description of the Advisory Firm

Total Wealth Planning and Management, Inc. is a Corporation organized in the state of Florida. The firm was formed in January of 2012, and the principal owners are William Richard Tomes, Jr. and Kimberly Tomes.

B. Types of Advisory Services

Total Wealth Planning and Management, Inc. (hereinafter "TWPM") offers the following services to advisory clients:

TWPM offers various financial planning and educational consultation for clients for a one-time fixed fee. This is a service we are offering to try to give those with smaller amounts of money, or only debt, access to financial advisors. Included in this is specific financial goal planning as well as more comprehensive financial planning, which looks at all goals, resources, etc.

We also offer asset management services. For those with less than \$100,000 in assets under our management, planning and other services are a la carte. At \$100,000 in assets under our management under the Traditional service offering, all other service offerings are included; specifically, comprehensive financial planning and other planning services at no additional cost.

We have begun to divide our offerings between two types of clients. Traditional, which is face-to-face, sit-down meetings on a more or less regular schedule and when needed or requested by the client. The other offering is entitled "E" services that are delivered only electronically and a la carte. As delivery of these services do not require travel and meeting time, we pass on some of the savings to the clients by offering a slightly reduced fee.

We use two types of account platforms at our principal custodian, Raymond James. These two platforms have mostly to do with their systems, policies, etc. We may use their "Ambassador" account platform when it is likely to be the least expensive type of platform for the type of securities traded. The Ambassador platform charges an asset-based fee to TWPM that covers all trading costs, custodial fees, etc. We also use their Independent Clearing Account ("ICA") platform and this is our most common account type. Under the ICA platform we principally use open-end mutual funds and utilize mutual funds from Raymond James' extensive list of funds for which transaction fees are waived, sales loads are waived, etc., leaving only the underlying management fees of the fund that comes out of the NAV. In some cases, especially in transfers, we may need or choose to sell or buy mutual funds or other investments that incur trading charges from Raymond James. In such circumstances, Raymond James will charge TWPM for trading, thus TWPM covers the fee and there is no cost to the client other than the TWPM fee that

was agreed to in the contract. ICA accounts will also be used to trade stocks, bonds and other securities for clients. Some households may have both Ambassador and ICA type accounts. The fee is usually set at the household level, but there may be exceptions for individual accounts in specific cases within a single household (for instance, a buy and hold index fund that we do not actively manage might be charged no fee, while the other accounts might be charged the standard fee, and a highly active or service intensive account might be charged a higher fee than the other household accounts).

As discussed, the Ambassador and ICA platforms will act like wrap accounts for regulatory purposes. You will be provided an ADV Appendix 1 Wrap Fee Brochure at account opening.

TWPM may hire other investment managers as sub-advisers and compensate them from the fees earned by TWPM, rather than any additional fee to clients.

Services Limited to Specific Types of Investments

TWPM generally limits its investment advice to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, REITs, insurance products including annuities, and government securities. TWPM may provide advice regarding other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

TWPM offers the same suite of services to all of its clients. However, specific client financial plans or investment programs and their implementation are dependent upon the

client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Typically, for a comprehensive client, TWPM has a multi-step process: 1) Initial Information Gathering and Risk Tolerance Assessment Meeting; 2) Compiling and Reviewing the Plan and Creating and Outline Overview; 3) Presentation to the Client Meeting.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent TWPM from properly servicing the client account, or if the restrictions would require TWPM to deviate from its standard suite of services, TWPM reserves the right to end the relationship.

D. Wrap Fee Programs

TWPM sponsors a wrap fee program, which is an investment program where the client pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. However, this brochure describes TWPM's non-wrap fee advisory services; clients utilizing TWPM's wrap fee portfolio management should see the separate Wrap Fee Program Brochure. TWPM manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. Fees paid under the wrap fee program will be given to TWPM as a management fee. Please also see Item 5 and Item 12 of this brochure.

E. Amounts Under Management

TWPM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 176,397,683 .00	\$ 1,934,968 .00	December, 2023

Item 5: Fees and Compensation

A. Fee Schedule

The following are the fees charged by Total Wealth Planning and Management, Inc. for services provided:

Lower fees for comparable services may be available from other sources.

eOver the Top Service Platform

Total Assets	Annual Fee
Below \$3,335.00	\$25 Flat
\$3,336.00 - \$50, 000.00	0.75%
\$50,001.00 - \$99,999.00	0.50%

If recommended custodian is chosen by the client, then management fees are deducted directly from the account. If another custodian is chosen by Client, then payment will be made by check, credit card, or electronic transfer into TWPM's account, which will be provided to Client. Management fees may be billed at the beginning of each quarter based on the closing value of the prior quarter and may be prorated for a partial quarter. For clients who prefer, fees may be charged monthly based on the prior month's closing value and may be prorated for a partial month. For some engagements, a flat, fixed, monthly fee may be charged. These fees are negotiable depending upon the needs of the client and complexity of the situation. Management fees are inclusive of transaction costs of the custodian. This wrap fee concept is disclosed in the wrap fee brochure delivered to the client.

Traditional Over Top Service Platform

Account Value	Max Rate
Up to \$500,00.00	1.50%
\$500,001.00 - \$1,000,000.00	1.40%
\$1,000,001.00 - \$4,999,999.00	1.25%
\$5,000,000.00 and above	1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation. Management fees are inclusive of transaction costs of the custodian. This wrap fee concept is disclosed in the wrap fee brochure delivered to the client. These are the

generally applicable fees, but for certain more complex situations a maximum fee of 2% may be charged.

A la carte services as needed

Services	Pricing
Debt Reduction Consultation	\$100
Educational Consultation by Phone	\$150 per hour
Educational Consulting in Person	\$250 per hour
Life or Long-Term Care Insurance Review	\$200 per individual
Goal-Specific Financial Planning	\$150 for most engagements
Annual Portfolio Review	\$250
Semi-Annual 401(k) Review	\$100 per 6 months with contract for two people or one-time \$250 for first person and \$100 for spouse
Stock Options Exercise and Executive Compensation Analysis	\$500 per individual
One-time Comprehensive Planning Online and by Phone	\$750
One-time comprehensive Planning in Person Meeting	\$1,200 flat fee or \$250 per hour, determined by scope of engagement and agreement

Financial Planning Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$750 and \$1,250. For the Traditional Over the Top Service Platform all planning services are included at no extra cost, except for clients under \$100,000 in AUM. For those clients, there will be a charge for comprehensive financial planning that will be \$1,250. Single objective financial planning services are for a fixed fee up to \$500 or may instead be charged at an hourly rate up to \$250/hour. Discounts may be provided to Veterans and First Responders on specific types of planning. TWPM offers the following types of planning services; Financial plans, Goal Specific Financial Planning, Portfolio Reviews, Semi-Annual 401-k portfolio reviews, Stock Option Strategy services, Life Insurance, Long term Care reviews and Educational Consulting. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. Thereafter, the agreement shall continue in effect until terminated by either party by giving to the other written notice.

B. Payment of Fees

Quarterly or monthly investment management fees, fixed financial planning fees or hourly Financial Planning fees are paid via electronic fee debit, credit card, or check in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

C. Clients Are Responsible For Third Party Fees

This brochure describes TWPM's non-wrap fee advisory services; clients utilizing TWPM's wrap fee portfolio management should see the separate Wrap Fee Program Brochure. Client accounts not participating in the wrap fee program are responsible for the payment of all third party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TWPM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

TWPM collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Financial Planning Fees will be returned within fourteen days to the client via credit card or check. Investment Supervisory Fees will be deposited back into client's account within fourteen days.

E. Outside Compensation For the Sale of Securities to Clients

TWPM Financial Advisors are not compensated for the sale of securities or insurance products. TWPM has no role in any of their insurance activities, they do so as advisors at other firms.

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

TWPM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

TWPM generally provides investment advice to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

❖ Trusts, Estates, or Charitable Organizations

There is no account minimum.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

TWPM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

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

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

TWPM uses long term trading.

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

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

TWPM uses long term trading.

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

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

C. Risks of Specific Securities Utilized

TWPM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

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

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

Real Estate funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

Hedge Funds are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Precious Metal ETFs (Gold, Silver, Palladium Bullion backed "electronic shares" not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no SRO proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither TWPM nor its representatives are registered representatives of a broker dealer.

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

Neither TWPM nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

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

Samuel Clifford Munhollon is an investment adviser representative with another firm. From time to time, he will offer clients advice or products from this activity. Total Wealth Planning and Management, Inc. always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Total Wealth Planning and Management, Inc. in such individual's outside capacity.

Samuel Clifford Munhollon is a committee member at Lt. Governor's Invitational Turkey Hunt Committee.

Samuel Clifford Munhollon is member of the board of directors at Oklahoma Station Chapter Safari Club International.

Samuel Clifford Munhollon is the vice president at Oklahoma Wildlife Management Association.

Samuel Clifford Munhollon is the owner at Sky Dance Bridge Business Professionals.

Samuel Clifford Munhollon is chairman of the architectural control committee at The Park Hidden Creek Homeowners Association.

Janelle Marie Skelton is a portfolio management associate of Cabot Lodge Securities LLC.

Janelle Marie Skelton helps with licensing at Metro Lawn & Landscaping.

Reid T Winder is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Total Wealth Planning and Management, Inc., are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Total Wealth Planning and Management, Inc., addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. Total Wealth Planning and Management, Inc., periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. Total Wealth Planning and

Management, Inc., will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by Total Wealth Planning and Management, Inc.'s supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

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

TWPM may direct clients to third-party investment advisers. TWPM will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that TWPM has an incentive to direct clients to the third-party investment advisers that provide TWPM with a larger fee split. TWPM will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. TWPM will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where TWPM is recommending the adviser to clients.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

TWPM does not recommend that clients buy or sell any security in which a related person to TWPM or TWPM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of TWPM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of TWPM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. TWPM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

TWPM employees, from time to time, may trade securities around the same time as clients or participate in a block transaction along with clients. Block transactions will not favor TWPM employees in any way. Any other transaction that may be perceived as a conflict of interest will be documented by TWPM and conducted in a manner that will not disadvantage a client of TWPM.

Item 12: Brokerage Practices

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

The custodian, Raymond James Financial Services, Inc. (CRD# 6694), was chosen based on its relatively low transaction fees and access to mutual funds and ETFs. TWPM will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian.

1. Research and Other Soft-Dollar Benefits

TWPM receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that TWPM must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for TWPM to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients' interests. The first consideration when recommending broker/dealers to clients is best execution. TWPM always acts in the best interest of the client.

2. Brokerage for Client Referrals

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

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

TWPM will recommend clients to use a specific broker-dealer to execute transactions. In limited circumstances TWPM will allow client directed brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

TWPM maintains the ability to block trade purchases and sales across accounts. When more than one account is trading a particular stock or ETF on the same day, block trading may be used to get identical pricing on the trades. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

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

All accounts for ongoing services are reviewed regularly, but no less than quarterly by William Richard Tomez, Jr., President, or the assigned investment adviser representative.

Review for financial planning engagements is conducted upon financial plan creation and plan delivery by William Richard Tomez, Jr., President, or the assigned investment adviser representative. There is only one level of review for financial plans, and that is the total review conducted to create the financial plan.

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

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each ongoing client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

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

Item 14: Client Referrals and Other Compensation

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

Other than soft dollar benefits as disclosed in Item 12 above, TWPM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to TWPM clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

TWPM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

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

Custody is also disclosed in Form ADV because TWPM has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, TWPM will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

For those client accounts where TWPM will have investment discretion, the client has given TWPM written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides TWPM discretionary authority via a discretionary investment management clause in the Investment Advisory Contract and/or a limited power of attorney clause in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

TWPM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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

Neither TWPM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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