

FCIG Wealth Management, LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of FCIG Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (877) 420-5234 or by email at: info@fcigwealth.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 FCIG Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. FCIG Wealth Management, LLC's CRD number is: 329906.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

FCIG Wealth Management, LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

FCIG Wealth Management, LLC (hereinafter “FWML”) is a Limited Liability Company organized in the State of Connecticut. The firm was formed in January 2024, and the principal owner is William M. Gilmore II.

B. Types of Advisory Services

Selection of Other Advisers

FWML directs clients to third-party investment advisers to manage the client's assets. Before recommending other advisers for clients, FWML will always ensure those other advisers are properly licensed or registered as an investment adviser. FWML conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. The investments made by the third-party adviser may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third-party adviser on behalf of FWML's client. FWML will review the ongoing performance of the third-party adviser as a portion of the client's portfolio. FWML may direct clients to AssetMark Trust Company, SEI, LPL Financial and Fidelity Investments, or another advisor that FWML deems appropriate for the client.

FWML creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). FWML evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Financial planning services are offered on a complimentary basis to all clients of FCIG's service “Selection of Other Advisors”, and as a standalone service for a fixed fee (please see Item 5 Below). Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

FWML generally limits its advice in its client's financial plans to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds,

commodities and non-U.S. securities. FWML may recommend other securities as well to help diversify a portfolio when applicable.

FWML has a fiduciary duty to act in the best interests of its clients under the Investment Advisers Act of 1940.

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

FWML offers the same suite of services to all its clients. However, specific client investment strategies and their implementation by the client's third-party advisor are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) as well as any similar documentation the client submits to the third-party advisor (FCIG requests that copies of any such documentation also be provided to FCIG). The third-party manager recommended to and engaged by the client will determine whether 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 the third-party manager from properly servicing the client account, or if the restrictions would require the third-party manager to deviate from its standard suite of services, the third-party manager reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. FWML does not participate in wrap fee programs.

E. Assets Under Management

FWML has the following assets under management by third-party advisors:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	February 2024

Item 5: Fees and Compensation

A. Fee Schedule

Selection of Other Advisers Fees

FWML's Fee Schedule

Total Assets Under Management	Annual Fees
\$0 - \$249,999	1.99%
\$250,000 - \$499,999	1.75%
\$500,000 - \$999,999	1.50%
\$1,000,000 - AND UP	1.30%

FWML will receive its standard fee on top of the fee paid to the third-party adviser. The advisory fee is calculated as disclosed in the client's contract with the third-party advisor as well as the third-party advisor's Form ADV Part 2A and may be charged on a monthly or quarterly basis, in advance or in arrears. The fees will not exceed any limit imposed by any regulatory agency. Similar services may be available from other advisors at a lower cost to the client.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement with the third-party advisor. Clients may terminate the agreement without penalty for a full refund of all fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Standalone Financial Planning Fees

Fixed Fees

The negotiated fixed fee for standalone financial plans will be between \$500 and \$10,000.

B. Payment of Fees

Payment of Selection of Other Advisers Fees

Asset-based portfolio management fees are withdrawn by the third-party manager directly from the client's accounts with client's written authorization on a quarterly basis, either in advance or in arrears.

Payment of Financial Planning Fees

Standalone financial planning fixed fees are paid via check. 50% of the fee is due at the time of agreement execution, with the balance due upon delivery of the plan to the client. Clients may terminate the agreement without penalty, for full refund of FWML's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Fee refunds or amounts due FWML will be calculated based on the percentage of the financial plan completed at the point of termination.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FWML and the third-party advisor.

D. Prepayment of Fees

FWML and the third-party manager may collect fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

For fixed fees that are collected in advance, fee refunds or amounts due FWML will be calculated based on the percentage of the financial plan completed at the point of termination.

E. Outside Compensation For Non-advisory Activities With Clients

William Martin Gilmore II is an insurance agent, the owner of an insurance agency, and an owner of an accounting and tax services firm, and, in these roles, accepts compensation for the sale of insurance products to clients, for his real estate brokerage activities, and based on his ownership of an insurance agency and his ownership of the accounting and tax firm. Please see Item 10 below for more information regarding these activities and affiliations, about the conflicts of interest they create, and the manners in which such conflicts are mitigated.

Advisory fees that are charged to clients are not reduced to offset the commissions on insurance products recommended to clients.

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

FWML 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

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations
- ❖ Corporations or Business Entities

There is no account minimum for any of FWML's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

FWML's methods of analysis include Modern portfolio theory.

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

Investment Strategies

FWML 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

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

Investment Strategies

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

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

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

C. Risks of Specific Securities Utilized

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

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

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

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

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are

generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes), and an ETF purchased at a premium may ultimately be sold at a discount. The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

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

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

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

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

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

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

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

C. Relationships Material to this Advisory Business and Conflicts of Interest

William Martin Gilmore II is a licensed insurance agent with and owns First Casualty Insurance Agency, Inc.. 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, products are limited to only those offered by certain insurance providers. FWML addresses these conflicts 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. FWML 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. FWML 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 FWML'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.

William Martin Gilmore II acts as a real estate broker or dealer and from time to time, may offer clients advice or products from those activities and clients should be aware that these services involve a conflict of interest. FWML always acts in the best interest of the client in this activity and clients are in no way required to utilize the services of any representative of FWML in connection with such individual's activities outside of FWML.

William Martin Gilmore II is an owner of an accounting and tax firm. He is not directly involved in the daily operations of the firm, and he is not an accountant or tax professional. This affiliation creates a conflict of interest since there is an incentive to recommend accounting and tax services based on his ownership of or other benefits received from the accounting and tax firm, rather than on the client's needs. Mr. Gilmore will only recommend such services when the recommendation is in the client's best interest. In addition, the client always has the right to decide whether to act on such a recommendation and, if the client decides to act on such recommendation, the client has the right to do so through the tax and accounting professional of their choosing.

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

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

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

A. Code of Ethics

FWML 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. FWML's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FWML may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FWML 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. FWML will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of FWML may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FWML to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FWML will never engage in trading that operates to the client's disadvantage if representatives of FWML buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

FWML does not recommend custodians or broker-dealers.

FWML generally recommends third-party investment advisors AssetMark Trust Company, SEI, LPL Financial and Fidelity Investments, but may recommend another advisor that FWML deems appropriate for the client. Each third-party investment advisor may require that the client engaging them custody their managed account at a particular custodian or allow the client to choose their custodian from among those recommended by that third-party investment advisor.

1. Research and Other Soft-Dollar Benefits

FWML receives no research, product, or services other than execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

FWML 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

As explained above, each recommended third-party investment advisor may require that the client engaging them custody their managed account at a particular custodian or allow the client to choose their custodian from among those recommended by that third-party investment advisor. Whether that third-party investment advisor allows the client to direct the trading of their account to an entity other than the client's custodian will be determined by the third-party investment advisor engaged by the client.

B. Aggregating (Block) Trading for Multiple Client Accounts

FWML does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

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

All client accounts for FWML's advisory services provided on an ongoing basis are reviewed at least Quarterly by William Gilmore II, Owner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at FWML are assigned to this reviewer.

All financial plans are reviewed upon creation and plan delivery by William Gilmore II, Owner. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of FWML's advisory services provided on an ongoing basis will receive a quarterly statement detailing the client's account, including assets held, asset value, and calculation of fees. This written statement 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)

FWML does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FWML's clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

FWML 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, FWML will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy and promptly notify FWML of any discrepancies.

Item 16: Investment Discretion

FWML provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, FWML generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

FWML 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

FWML neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

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

C. Bankruptcy Petitions in Previous Ten Years

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