

Item 1: Cover Page

ADV Part 2A
Brochure



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March 2024

This brochure provides information about the qualifications and business practices of Timmons Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (774) 331-2172 or by email at Liam.Timmons@TWealthManagement.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.

Timmons Wealth Management, LLC is registered as an Investment Advisor with the United States Securities and Exchange Commission ("SEC"). Registration as an Investment Advisor does not imply any level of skill or training.

Additional information about Timmons Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Timmons Wealth Management, LLC is 165914.

Item 2: Summary of Material Changes

This Firm Brochure provides a summary of the services of Timmons Wealth Management, LLC, its fees, professionals, and certain business practices and other matters.

This Item is used to provide clients with a summary of material changes to our business since our last filing of the Firm Brochure in March 2023.

- Timmons Wealth Management, LLC is now registered as an Investment Advisor with the US Securities & Exchange Commission.

If you would like to receive a complete copy of the brochure, including the supplement, please contact us at (774) 331-2172 or by email at Liam.Timmons@TWealthManagement.com.

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Item 4: Advisory Business

Timmons Wealth Management, LLC (“TWM” or the “Advisor”) is an Investment Adviser registered with the U.S. Securities and Exchange Commission, and has filed notice as required in Massachusetts, Rhode Island, Florida, and New Hampshire. Timmons Wealth Management was formed in October 2012 as a Massachusetts Limited Liability Company and is located in Attleboro, Massachusetts. The Managing Member and principal owner is Liam M. Timmons. The firm also employs a Client Service Associate on a part-time basis.

TWM offers Wealth Management Services, which consists primarily of investment management and financial planning. These services are described under the sub-headings of **Investment Management** and **Financial Planning** below.

Wealth Management Services***Investment Management***

TWM manages client investment portfolios based on each client’s goals, objectives, time horizon, and risk tolerance. TWM creates an Investment Policy Statement for each client, which outlines the investment strategy for the portfolio based on the information provided by the client.

Based on the Investment Policy Statement, TWM establishes an asset allocation, selects the investments for each component of the allocation, monitors the portfolio’s performance and rebalances the portfolio as needed. The selection of investments takes into consideration any existing holdings which the client will continue to own (e.g., restricted stock, low-cost-basis shares).

The portfolios’ investments generally consist of mutual funds and exchange traded funds (ETFs) which are invested in equity and fixed income securities. More limited use may also be made of individual equity and fixed income securities, funds invested in alternative investments, publicly traded real estate investment trusts (REITs) and equity options. TWM may use other securities as well to help diversify a portfolio when appropriate.

The investment advisory agreement with the client gives TWM discretionary management authority, which means that TWM will select securities and execute transactions that are consistent with the Investment Policy Statement without advance client consent. The client may impose reasonable restrictions on investments in certain companies, market sectors, or types of securities.

While TWM will periodically contact the client to report on the account and review the client’s financial situation, it is the responsibility of the client to notify TWM of any change in the client’s financial condition or investment objectives.

Financial Planning

As part of each client relationship, TWM provides customized financial planning services. Each engagement begins with an extensive interview process which incorporates a deep assessment of client goals, risk tolerance, investment time horizon and current and prospective financial position. Special attention is paid to areas of particular concern based on the client’s individual needs. These may include retirement goals and strategies, executive compensation, education funding, budgeting, savings, risk management, insurance needs (i.e., life and disability coverage) and tax and estate planning. Some of these areas may involve coordination with the client’s other professional service providers, e.g., the client’s attorney or accountant. (The Advisor does not provide legal, tax, or accounting services, and is not an insurance broker.) This is not a stand-alone service.

Wrap Fee Program

TWM does not participate in wrap fee programs.

Assets Under Management

As of February 29, 2024, the Advisor had a total of \$114,788,394 of discretionary assets under management and no non-discretionary assets under management.

Item 5: Fees and Compensation**Wealth Management Services**

Client fees are the sole source of the Advisor's income.

The Advisor charges a fee for Wealth Management Services based on the value of the client's account (as determined by the account's custodian) at the end of each quarter. The fee is charged quarterly in arrears and includes both Investment Management and Financial Planning services. The fee is prorated for any periods that are less than a complete fee period (e.g., upon opening or termination of the account). Contributions and withdrawals in excess of \$10,000 from the account are also pro-rated during the quarter.

The fee, on an annual basis, is as follows:

Account Value	Annual Fee Rate
Up to \$250,000	1.25%
\$250,001 to \$2,000,000	1.00%
\$2,000,001 to \$5,000,000	0.75%
\$5,000,001 to \$10,000,000	0.65%
\$10,000,001 and above	Negotiable

The fee schedule is tiered in nature. Accordingly, the fee is 1.25% for the first \$250,000, 1.00% on the next \$1,500,000, 0.75% for the following \$3,000,000, etc.

TWM generally requires a minimum household asset level of \$250,000 for Wealth Management Services. TWM, in its discretion, may waive its minimum asset level, charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fees on a different interval, based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, related accounts, complexity of the engagement). As a result, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees.

General Provisions

For the services described above, the final fee schedule will be attached as an exhibit to the investment advisory agreement. Clients may terminate their agreement with thirty days' written notice. Clients may terminate their accounts without penalty within five (5) business days of signing the agreement. If after five (5) business days the Client terminates the agreement without having funded the account, TWM shall be entitled to receive compensation for any work performed on behalf of the client prior to receipt of the written notice of cancellation, at the rate of \$150 per hour, with a minimum fee of \$600.

Wealth Management Services clients typically authorize the Advisor to deduct its fee directly from the client's account. The client will receive an invoice from the Advisor and the deduction of the fee will be reflected in the account statement that the client receives from the custodian. Clients may also choose to pay the fee directly to the Advisor.

The Advisor does not serve as a qualified custodian and does not require prepayment of fees of more than \$1,200 and six months or more in advance.

Other Costs Involved

In addition to the fee paid to TWM, wealth management services clients will incur other fees and expenses associated with their accounts. Such fees and expenses include:

- Mutual fund and ETF fund-level fees and expenses paid to the funds' service providers for investment management, custodial, trading, administrative services, and other costs. (These are disclosed in the funds' prospectuses).
- Brokerage and custody fees and administrative expenses associated with the client's account.

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

Performance-based fees are fees based on a share of capital gains or capital appreciation of the assets in the client's account. The Advisor does not charge performance-based fees.

Item 7: Types of clients

TWM provides services to individuals, including high-net worth individuals, small businesses, and charitable organizations. The Advisor generally requires a minimum asset level of \$250,000 for Wealth Management Services. TWM, in its sole discretion, may waive or reduce its minimum asset requirement based upon certain criteria as detailed in Item 5 above. TWM reserves the right to determine that an account (or proposed account) is too small to be managed effectively.

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

All investments involve different degrees of risk. Clients should be aware of their risk tolerance level and financial situation at all times. TWM selects investments with the goal of obtaining maximum investment gains consistent with the clients' objectives as reflected in the Investment Policy Statement. On a periodic basis, and more frequently if the client's circumstances or the financial markets materially change, TWM will review the Investment Policy Statement with the client and may adjust allocations.

TWM cannot guarantee the successful performance of an investment and accounts may incur losses.

Methods of Analysis

The Advisor utilizes a variety of methods and strategies to make investment decisions across client portfolios. The methods of analysis include fundamental research/analysis and cyclical analysis.

Fundamental Analysis

This method of analysis focuses on conducting due diligence on the fundamental data of investment vehicles including mutual funds and exchange traded funds. It considers the strategy and style employed, return expectations, track record, investment structure, management team, resources, and regulatory history. The qualitative component of fundamental analysis focuses on assessing the organization, people, process, portfolio, and performance. The quantitative component of fundamental analysis focuses on evaluating return attribution, risk metrics, relative performance, style consistency, manager skill, and diversification benefits to the client portfolio.

Cyclical Analysis

This analysis takes into consideration economic cycles and economic data when assessing how various asset classes and market sectors of the market will perform. Examples of key macroeconomic factors include economic growth rates (GDP), real interest rates, inflation data, credit conditions, consumer spending, and business/consumer sentiment.

TWM gathers and utilizes research information from a variety of sources including published industry research (Morningstar, S&P, Argus, Credit Suisse, Blackrock), third party data providers, due diligence meetings with fund/ETF managers, news from financial magazines and publications, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. Clients should be aware that there are risks associated with all types of investments, including investment in securities. Investments are not insured or guaranteed. Investing in securities involves risk of loss that clients should be prepared to bear.

Investment Strategies

The firm invests client assets against very well-defined objectives. Portfolio asset allocations are customized based on each clients' unique requirements. Assets are allocated actively across a diversified group of asset classes and managers. All investment decisions are made within the constraints established by the client.

Market, Security and Regulatory Risks

Any investment in securities involves significant risk, including a complete loss of initial investment. All investment programs have certain risks that are borne by clients which are described below. The risks described relate to direct investment in securities or investment in funds whose investment portfolios hold the securities.

Market Risks

Competition. Availability of Investments

Certain markets are extremely competitive for attractive investment opportunities. As a result, there can be no assurance that the fund managers will be able to identify or successfully pursue attractive investment opportunities in such environments.

Market Volatility

The profitability of the portfolios substantially depends upon the managers correctly assessing the future price movements of stocks, bonds and other securities and the movements of interest rates. TWM cannot guarantee that it will be successful in selecting funds whose managers accurately predict price and interest rate movements. The performance of any investment is subject to numerous factors which are neither within the control of, nor predictable by, the manager. Such factors include a wide range of economic, political, competitive, technological, and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability to realize profits.

Material Non-Public Information

If TWM ever becomes aware of material non-public information with regard to a public traded security, the Firm will not be free to act upon any such information. Due to these restrictions, the Firm may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

Accuracy of Public Information

The Advisor selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Advisor by the issuers or through sources other than the issuers. Although the Advisor evaluates all such information and data, it is not in a position to confirm the completeness, genuineness, or accuracy of such information and data. In some cases, complete and accurate information is not available.

Market or Interest Rate Risk

The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the account holds a fixed income security to maturity, the change in its price before maturity may have little impact on the account's performance;

however, if the Advisor has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the account. Similarly, funds which invest in fixed income securities will usually see their net asset values fall as interest rates rise, and vice versa.

Inflation Risk

For all but inflation-linked bonds, adjustable bonds or floating rate bonds, fixed-income investments are exposed to inflation risk, which reduces the purchasing power of the client's assets.

Non-U.S. Investments

Investing in the securities of companies (and, from time to time, governments) outside of the United States involves certain additional considerations, including political and economic considerations, such as greater risks of expropriation, nationalization, confiscatory taxation, imposition of withholding or other taxes on interest, dividends, capital gains, other income or gross sale or disposition proceeds, limitations on the removal of assets, and general social, political and economic instability; the relatively small size of the securities markets in such countries and the low volume of trading, resulting in potential lack of liquidity and in price volatility; the laws and regulations applicable to the securities and financial services industries of certain countries; fluctuations in the rate of exchange between currencies and costs associated with currency conversion; and certain government policies that may restrict the client's investment opportunities. In addition, accounting and financial reporting standards may not be as high as U.S. standards and, consequently, less information is typically available concerning companies located outside of the U.S. It may also be more difficult to enforce the client's rights in such markets.

Risk of Default or Bankruptcy of Third Parties

The funds in which the Firm invests client accounts may engage in transactions in financial instruments and other assets that involve counterparties. Under certain conditions, the fund could suffer losses if a counterparty to a transaction were to default or if the market for certain securities or other financial instruments and/or other assets were to become illiquid.

Strategy Restrictions

Certain clients may be restricted (or may choose to be restricted) from directly utilizing investment strategies of the type in which the Firm may engage. Clients who may be so restricted should consult their counsel and accountants to determine what restrictions may apply or may be appropriate.

Trading Limitations

For all securities, instruments and/or assets listed on an exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the account to loss. Also, such a suspension could render it impossible for the Firm or a fund manager to liquidate positions and thereby expose the account to potential losses.

Liquidity

Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

Options and Other Derivative Instruments. The Advisor may, from time to time, engage in the buying and selling of puts and calls on some of the securities held by the Advisor or in a securities index. The prices of options are highly volatile and depend on the values of the securities, indexes, currencies, or other instruments underlying them. Price movements of options or currency contracts are also influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies.

Hedging Transactions. Any hedging against a decline in the value of portfolio positions does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedging transactions also limit the opportunity for gain if the value of the portfolio positions should increase. The Advisor is not obligated to establish hedges for portfolio positions and may not do so.

Regulatory Risks

Strategy Restrictions. Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Advisor may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel, and accountants to determine what restrictions may apply and whether an investment in the Advisor is appropriate.

Item 9: Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material in the evaluation of the Advisor or the integrity of the firm's management. TWM and Liam Timmons have not been disciplined by any governing authority, including any regulatory agency, or any industry association of which they are licensed and/or are members.

Item 10: Other Financial Industry Activities and Affiliations

Neither Timmons Wealth Management nor its managing member are registered or have an application pending to register as a broker-dealer or registered representative of a broker-dealer.

Neither Timmons Wealth Management nor its managing member are registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Timmons Wealth Management does not recommend or select other investment advisors for clients nor does it have other business relationships with those advisors that create a material conflict of interest.

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

The Advisor strives to observe the highest industry standards of conduct based on its obligation as a fiduciary to its clients. TWM has adopted a written Code of Ethics (the "Code") that is applicable to all employees. Each employee will be provided a copy, and is required to acknowledge, in writing, that they have received, read, understand, and will abide by, the Code, and the TWM Compliance Manual, upon commencement of employment and upon any material change to the Code.

The Code requires that employees act in the client's best interests and comply with applicable laws and regulations. Employees are expected to avoid any action that is, or could even appear to be, legally or ethically improper. The principles outlined in the Code apply to all conduct, whether or not the conduct is also covered by more specific standards or procedures set forth in the Code, Compliance Manual, or elsewhere. Employees are required to bring any violations, actual or suspected, of the Code immediately to the attention of TWM's Chief Compliance Officer ("CCO"). Failure to comply with the Code may result in disciplinary action or other sanctions including termination of employment.

The Code also places certain restrictions on the personal trading activities of employees and their immediate family members. Employees may purchase and sell any securities not specifically prohibited by the Code. Employees are required to disclose their personal securities holdings annually and personal securities

transactions quarterly to the Chief Compliance Officer. Employees may also participate in limited offerings such as hedge funds, private equity funds, or other types of private offerings.

A copy of the Code of Ethics shall be provided to any client or prospective client upon request.

Material components of the Code, in summary form, include:

Standard of Business Conduct. It is the responsibility of all employees to ensure that the Advisor conducts its business with the highest level of ethical standards and in keeping with its fiduciary duties. Employees have a duty to place the interest of the clients first, and to refrain from having outside interests that conflict with the interests of its client(s).

Prohibited Conduct. The Advisor's employees must avoid any circumstances that might adversely affect or appear to affect their duty of complete loyalty to clients.

Privacy of Client Information. All information relating to client's account(s) is strictly confidential.

Personal Securities Transactions. All employees shall comply with the Advisor's personal account trading policy summarized below.

Conflicts of Interest. Employees may not use any confidential information or otherwise take inappropriate advantage of their positions for the purpose of furthering any private interest or as a means of making any personal gain. Employees and their immediate families may not accept any benefit from any person who does business with the Advisor, other than business courtesies and non-cash gifts of nominal value.

Service as a Director. No employee may serve as a director of a publicly held company without prior approval by the CCO based upon a determination that service as a director would not be averse to the interest of clients.

Reporting of Violations. Employees are required to promptly report all actual or potential conflicts of interest, violations of any government or regulatory law, rule or regulation, or violations of the Advisor's policies and procedures.

Training. Compliance training for all employees will occur on a periodic basis.

Review and Enforcement. The CCO is responsible for ensuring adequate supervision over the activities of all persons who act on the Advisor's behalf to prevent and detect violations of the Code by such persons.

Participation or Interest in Client Transactions and Personal Securities Trading. All employees shall comply with the procedures governing personal securities transactions set forth in the Code. Employees may buy or sell securities that are also held by clients, subject to procedures that are designed, among other matters, to assist the CCO in avoiding potential conflicts of interests and detecting and preventing abusive trading practices such as "front running." Strict compliance with the Advisor's personal trading policy is essential to the Advisor and its reputation. Any violation of the Advisor's personal trading policy can be grounds for immediate dismissal by the Advisor of any employee. Every employee of the Advisor is expected to be familiar with the personal trading policy and the procedures contained therein. These matters can be reviewed with the CCO at any time.

The CCO shall maintain current and accurate records of all personal securities transactions in which employees have a direct or indirect beneficial interest. The following restrictions shall apply to securities transaction(s) by employees of the Advisor and their related persons:

Restricted Securities. The Advisor shall maintain a restricted list of securities for which no trading by employees is allowed, e.g. because the Advisor may have material non-public information.

Black-Out Period. Employees will not be permitted to execute a personal transaction in any security for which there is a pending order until the order is completed or withdrawn.

Initial Report. An employee shall, no later than 10 days after the employee begins its relationship with the Advisor, provide the Advisor with brokerage account statements, which are as of a date that is within 45 days of the date the employee submits them to the Advisor, and complete and submit a list of brokerage accounts.

Quarterly Reports. On a quarterly basis all employees shall submit to the CCO a personal securities transaction report.

Annual Report. Following the completion of each calendar year, employees must resubmit a list of personal brokerage accounts.

Record-Keeping Requirements. The CCO shall establish a record of personal securities transactions.

Item 12: Brokerage Practices

Clients are instructed to open a brokerage account with the institutional platform of Charles Schwab & Co., Inc. ("Charles Schwab"), a registered broker-dealer, to maintain custody of account assets and to effect trades for the accounts. TWM and Charles Schwab are not affiliated.

Best Execution

The Advisor believes that the selection of Charles Schwab is in the clients' best interest. This is based on our comparison of the quality and cost of the firm's brokerage and custody services as compared to its competitors. It is also based on TWM's determination that Charles Schwab can provide "best price and execution" in effecting client trades. The firm provides investment advisory firms like TWM with an institutional trading platform and account management and administrative, recordkeeping and client-reporting software. The firm also provides pricing information and other market data.

Other products and services which the firm may provide at no additional cost are third-party research, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. The firm may, from time to time, waive transaction expenses, which may benefit client accounts as well as the personal accounts of employees. Information about the various fees associated with custody and trading are detailed in the custodial agreement and/or account opening documents.

Trade Aggregation

TWM may aggregate orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account. The firm engages in block trading when it is consistent with the duty to seek best execution and is consistent with the terms of our investment advisory agreements.

Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day.

Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety,

securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. TWM may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

Soft-Dollar Arrangements

TWM does not receive any brokerage commissions, nor does it have any obligation to direct client transactions to a particular broker-dealer in order to receive research or other “soft dollar” benefits. TWM does not receive any referrals from broker/dealers.

Item 13: Review of Accounts

Client accounts are reviewed at least quarterly only by Liam Timmons, the Managing Member. Mr. Timmons will evaluate the performance of the account considering the account’s investment strategy and the client’s investment objectives and risk tolerance. Each client receives a quarterly report from the Advisor which shall discuss the account’s performance as well as the client’s financial condition based on an assessment of the client’s aggregate assets, which may include defined contribution plans or other assets held elsewhere to which TWM has been provided access for management purposes.

Reviews between quarters may be triggered by material market, economic or political events, or by changes in client’s financial situations (e.g., retirement, termination of employment, relocation, or inheritance) or by client request.

Clients should review TWM’s reports closely and compare them with the monthly statements they receive from Charles Schwab & Co., Inc.

Clients are contacted at least annually to discuss the account’s performance and to determine whether there have been any changes in the client’s investment goals or financial condition. Clients are also encouraged to notify the Advisor promptly of any such changes.

Item 14: Client Referrals and Other Compensation

TWM has no client referral or solicitation arrangements with third parties. Consultants contracted by the Advisor may introduce prospective clients to the Advisor but are not compensated if such persons become clients of the Advisor. TWM may refer clients to professional service providers but receives no compensation for doing so, and assumes no responsibility for the work performed by them.

Item 15: Custody

Except in the limited instances described below, TWM does not have custody of Clients’ assets.

In the view of the SEC, investment advisers are deemed to have “custody” of client funds if they have the ability to directly debit advisory fees from client accounts. Because TWM has authorization to directly debit the client’s account(s) for payment of advisory fees the Advisor is said to exercise limited custody over client assets (pursuant to written authorization in the investment advisory agreement). TWM is responsible for ensuring that the account’s independent, qualified custodian will provide account statements directly to clients, at least quarterly, and that the client’s statement will clearly label the advisor’s fee. In addition, for each case where the

fee is directly debited from the client's account, the Advisor concurrently sends the custodian and client an invoice of the amount of the fee to be deducted.

Qualified custodians that hold client assets will provide account statements directly to clients at their address of record at least quarterly. The statement will indicate all amounts disbursed from the account including the amount of management fees paid directly to the Firm. Clients are encouraged to carefully review the statements provided by their custodians. TWM does not provide any account statements. However, it does send periodic supplemental reports to clients regarding their financial condition.

TWM may also be deemed to have "custody" of client funds if the client has signed a standing letter of authorization ("SLOA") authorizing the Firm to make certain transfers of client funds among the client's accounts. SLOA arrangements are subject to a number of specific safeguards, including (i) the client provides a signed written instruction to the custodian that includes the third party's name, and either the address or account number to which the transfer should be directed, (ii) the client's custodian verifies the instruction and promptly provides a transfer of funds notice to the client, (iii) the client has the ability to terminate or change the instruction, (iv) the investment adviser has no authority or ability to designate or change the identity of the third party or any information about the third party, and (v) the client's custodian reconfirms the instruction annually.

Item 16: Investment Discretion

TWM typically has discretionary authority over the individual portfolios that it manages. TWM may agree to manage an account on a non-discretionary basis under exceptional circumstances. The grant of discretionary authority is included in the terms of the investment advisory agreement. The client may impose reasonable restrictions on the investments in certain companies, market sectors, or types of securities.

Item 17: Voting Client Securities

As a matter of firm policy and practice, TWM does not have authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because the Advisor does not serve as a qualified custodian and does not require prepayment of fees of more than \$500 and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The Advisor does not have any financial impairment that will preclude it from meeting contractual commitments to clients.

Bankruptcy Petition during the Past Ten Years

Not applicable to TWM or its Managing Member.