



**Aevitas Wealth Management, Inc.  
(formerly Michael A. Schreiber & Associates, Inc.)**

**Form ADV Part 2A - Disclosure Brochure**

**January 12, 2017**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc. and herein “Aevitas” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (781) 239-1180 or [michael@aevitaswm.com](mailto:michael@aevitaswm.com).

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

Additional information about Aevitas and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 143873.

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## ITEM 2 - MATERIAL CHANGES

At least annually, this section will discuss specific material changes that are made to the Aevitas Disclosure Brochure, if any, and provide you with a summary of such changes and reference to the date of the last annual update to this Disclosure Brochure.

### Material Changes

- The Advisor has changed the legal name of its entity from Michael A. Schreiber & Associates, Inc. to Aevitas Wealth Management, Inc. effective January 3, 2016.
- The Advisor has amended its Advisory Services to include Retirement Plan Advisory Services. Please see Items 4 and 5 for additional information.
- Ms. Duffy may provide investment advisory services under the “doing business as” name Parkway Wealth Management. Please see Item 4 and Ms. Duffy’s Form ADV2B – Brochure Supplement.

A current copy of this Disclosure Brochure may be requested by contacting us at (781) 239-1180 or [michael@aevitasm.com](mailto:michael@aevitasm.com).

Additional information about Aevitas is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The IARD number for Aevitas is 143873. The SEC’s web site also provides information about any persons affiliated with Aevitas Wealth Management, Inc. who are registered, or are required to be registered, as Advisory Representatives of Aevitas.

### ITEM 3 - TABLE OF CONTENTS

ITEM 2 - MATERIAL CHANGES.....	2
ITEM 3 - TABLE OF CONTENTS.....	3
ITEM 4 - ADVISORY BUSINESS.....	4
ITEM 5 - FEES AND COMPENSATION .....	7
ITEM 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT .....	10
ITEM 7 - TYPES OF CLIENTS.....	10
ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS.....	10
ITEM 9 - DISCIPLINARY INFORMATION.....	11
ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	11
ITEM 11 - CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and PERSONAL TRADING .....	12
ITEM 12 - BROKERAGE PRACTICES .....	13
ITEM 13 - REVIEW of ACCOUNTS .....	15
ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION .....	15
ITEM 15 - CUSTODY.....	16
ITEM 16 - INVESTMENT DISCRETION .....	16
ITEM 17 - VOTING CLIENT SECURITIES .....	17
ITEM 18 - FINANCIAL INFORMATION.....	17
BROCHURE SUPPLEMENTS (FORM ADV2B):	
FORM ADV2B – MICHAEL SCHREIBER.....	17
FORM ADV2B – AMY RESNIC .....	20
FORM ADV2B – ELLEN DUFFY .....	23
PRIVACY POLICY .....	27

## **ITEM 4 - ADVISORY BUSINESS**

Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc. and hereinafter referred to as “Aevitas” or the “Advisor” and also referred to as “we”, “us” or “our”) provides customized independent advice to “Clients” in various areas of financial services including financial planning, investment management, risk management and estate planning. Services offered by Aevitas are geared toward individuals and their families including high net worth individuals, pension and profit sharing plans, charitable organizations and other corporate entities (each a “Client” and also referred to as “you” or “your”).

Ms. Duffy, a Financial Advisor with Aevitas, may also conduct business under the “doing business as” name Parkway Wealth Management. Please see Ms. Duffy’s Form ADV2B – Brochure Supplement, which is included with this Disclosure Brochure.

### **A. Firm Information**

Aevitas has operated as a Corporation formed under the laws of the Commonwealth of Massachusetts in since April 2014. The Advisor changed its name with the Commonwealth of Massachusetts in January 2017. Previously the Advisor operated as a sole proprietorship. The Advisor became registered with the U.S. Securities and Exchange Commission (“SEC”) in June 2007. Michael A. Schreiber (CRD #1659555, is the President and Chief Compliance Officer of the Advisor. Michael has been in the financial services industry since 1987. Additional business information about Michael and the Advisory Representatives who work with Clients, are disclosed in the Form ADV2B - Brochure Supplements attached to this Disclosure Brochure.

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

At Aevitas, we believe that trust and understanding is the cornerstone of a successful, long-term Advisor/Client relationship. Working with Clients, our goal is to tailor investment strategies and financial plans to help you achieve your goals. Aevitas offers the following advisory services, with each service more fully described below:

- Investment Management Services
- Financial Planning Services
- Analysis, Recommendation and Monitoring of Unaffiliated Managers
- Educational Seminars/Workshops

#### Investment Management Services

When Aevitas completes its analysis of your situation, Aevitas will determine an asset allocation customized to your financial goals, objectives and risk tolerance. We customize your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

We will schedule a meeting with you and present the recommended portfolio allocation. We will discuss the allocation strategy in detail and if necessary, the recommended portfolio will be adjusted to meet your comfort level as to risk and reward. Once you are comfortable with the allocation and upon your approval, we will implement the initial portfolio allocation. After we implement the initial portfolio allocation, with your written approval as indicated in the advisory agreement, we will provide continuous and ongoing management of your account[s] using our own discretion to

determine any changes to the investments in the account[s]. Unless otherwise expressly requested by you, Aevitas will manage the account[s] and will make changes to the allocation[s] as deemed appropriate by the Advisor and your Advisory Representative. If your financial situation or investment goals or objectives change, you must notify Aevitas promptly of the changes.

Aevitas will determine the securities to be purchased and sold in the account[s] and will alter the securities holdings from time to time, without prior consultation with you. Under this authority, Advisory Representatives are allowed to buy, sell or exchange securities and instruments in your account[s], arrange for delivery and payment in connection with the foregoing, select and retain asset managers and act on your behalf in most matters necessary or incidental to the handling of your account[s], including management of the assets. However, Aevitas is not authorized to receive and vote proxies or receive annual reports. You will execute instructions authorizing Aevitas to have this trading authority for your account[s] as required by the Custodian. Depending on your specific goals and objectives, we will generally hold positions in your account[s] for long-term periods. However, there are situations that may warrant shorter holding periods of less than one year and in unique circumstances of thirty (30) days or less.

If you specifically request to have your account[s] managed on a non-discretionary basis, no changes will be made to the allocation of your account[s] without prior consultation with you and your expressed agreement for each transaction. After making the initial asset allocation recommendation, we will monitor your account[s] on an ongoing basis and make investment recommendations.

Our Advisory Representatives primarily use individual securities, open-ended mutual funds including no-load and load waived or mutual funds purchased at net asset value (NAV) and exchange traded funds (“ETFs”). However, managed accounts are not exclusively limited to those products and may include certificates of deposits, government securities, covered options, money markets, annuities, direct participation programs and REITs. The Advisor may also use other types of investments, as appropriate, to help achieve a Client’s particular goals.

Transactions in the account[s], account reallocations and rebalancing may trigger taxable event[s], with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Aevitas does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account[s], other than the investment management fees noted in Item 5 below.

#### Financial Planning Services

Aevitas will schedule a meeting with you to gather financial information and history from you about your retirement and financial goals, investment objectives, investment horizon, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, and other applicable financial information in order to provide the planning services you request. Aevitas offers financial, estate, and retirement planning services. At your request, we will prepare a written financial plan (the “Plan”) and present the analysis of your situation along with our recommendations for steps to be taken to assist you to work toward your financial goals.

The Plan is based on your financial situation at the time and on the financial information you disclosed to our Advisory Representative[s]. You need to be aware that certain assumptions may be made with respect to interest and inflation rates as well as the use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Aevitas cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the Plan and update the Plan based upon changes in your financial situation, goals, or objectives or changes in the economy. You are advised that the advice offered by Aevitas may be limited and is not meant to be comprehensive. Based on your specific needs or situation, you may need to seek the services of other professionals such as an attorney and/or accountant. You are not obligated to implement planning advice through Aevitas or your Advisory Representative. If you do choose to implement the plan with our Advisory Representative, they may receive commissions or other compensation for the implementation of insurance recommendations, in addition to the advisory fee you paid for the planning services.

#### Retirement Plan Advisory Services

Aevitas provides 3(21) retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor’s retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Employee Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Support
- Investment Management
- Performance Reports
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by Aevitas serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Aevitas’s fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### Educational Workshops

We may conduct educational workshop and seminars on various financial topics such as retirement strategies, employee benefits, etc.

#### **C. Client Account Management**

We tailor the advisory services we offer to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. We will ask you to complete an account information form/data gathering questionnaire to assist us with obtaining information about your financial situation and history. Additionally, one or more of our Advisory Representatives will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered by Aevitas will assist the firm in providing you

with the requested services and customize the services to your financial situation. Depending on the services you have requested, we will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Existing portfolio statements, including retirement account information
- Financial needs
- Tax bracket information
- Cash flow analysis
- Cost of living needs
- Savings tendencies
- Other applicable financial information required by our Advisory Representative in order to provide the investment advisory services you have requested.

#### **D. Wrap Fee Programs**

Aevitas does not participate in any wrap fee programs.

#### **E. Assets Under Management**

As of December 31, 2016, Aevitas managed approximately \$318 million of Client assets on a discretionary management basis, and \$8 million on a non-discretionary management basis

#### General Information

The investment recommendations and advice offered by Aevitas and your Advisory Representative are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Our primary goal is to help our Clients identify and pursue their financial goals, thereby enhancing the overall quality of their lives.

### **ITEM 5 - FEES AND COMPENSATION**

#### **A. Fees for Advisory Services**

#### Investment Management Services

Our investment management fees are payable quarterly, in arrears of each calendar quarter, and are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account[s]. The fees are in accordance with the following tiered fee schedule:

<b>Aggregate Account Size*</b>	<b>Maximum Annual Fee</b>
Up to \$249,999	1.20%
Next \$250,000 up to \$999,999	1.00%
Next \$1,000,000 and above	Negotiable

\* Your maximum annual asset management fee is based on an aggregate value of all managed accounts within the established household.

We sometimes make exceptions to our general fee schedule under certain circumstances (e.g., responsibilities involved; accounts or groups of accounts which are expected to have significant capital additions in the future; anticipated future earning capacity; related accounts; account composition; pre-existing Client relationship; account retention; pro bono activities, etc.). In such cases, lower or higher fees or different payment arrangements can be negotiated with each Client separately and will be described in the Client's advisory agreement. Aevitas may change the above fee schedule upon 30-days prior written notice to you.

You may make additions to the account[s] or withdrawals from the account[s], provided each account continues to meet minimum account size requirements. Additional deposits into the account[s] during a quarter for amounts equal to the lesser of ten (10) percent of account assets or \$50,000 or more will be charged a prorated fee based on the number of days remaining in the quarter. Assets withdrawn from an account during a quarter for amounts equal to the lesser of ten (10) percent of account assets or \$50,000 or more will be charged a prorated fee based on the number of days in the quarter up to the withdrawal date. No fee adjustments will be made for account appreciation or depreciation.

#### Financial Planning Services

Fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as insurance.

We offer planning services on an hourly and/or fixed fee basis. Planning fees are negotiated at the discretion of Aevitas and are based on an hourly rate agreed upon prior to initiating services. Our hourly rate ranges from \$100 to \$300 per hour and fixed fees generally range from \$250 to \$4,000, based on the expected effort to complete the engagement. Your fees will be dependent on several factors including time spent with Aevitas, number of meetings, complexity of your situation, amount of research, services requested and/or staff resources.

#### Retirement Plan Advisory Services

Fees may also be charged based on either an annual fixed dollar amount or a percentage of assets under management fee per year, payable quarterly, in arrears of each calendar quarter.

#### Educational Workshops

We may impose a fee for educational workshops. Generally, the employer, civic or non-profit group sponsoring the workshop will pay any fees charged by us. In the event there is a charge to workshop attendees, the fee will be published in the workshop announcement or invitation.

### **B. Fee Billing**

#### Investment Management Services

Investment management fees will be charged to and collected directly from the Client account[s]. The Client grants the Advisor the authority to deduct its investment management fees from the account[s] at the Custodian pursuant to the terms of the advisory agreement. Fidelity will provide you with a statement, at least quarterly, that lists the total fees deducted from the account[s] as well as all transactions that were conducted in the account[s] that quarter. If a Client's account is established or closed during the middle of a quarter, you will pay a pro-rated portion of the



investment management fee based upon the number of days the account was under Aevitas's management.

#### Financial Planning Services

Hourly and fixed fees will be billed to you directly and are due upon your receipt of our invoice. Fees are invoiced upon completion of the planning engagement.

#### Retirement Plan Advisory Services Fees

Aevitas is compensated for its services at the end of the quarter after advisory services are rendered. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

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

In addition to the investment management fees above, you will pay transaction fees for securities transactions executed in your account[s] in accordance with the Custodian's transaction fee schedule. You may also pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the account[s]. These fees are not charged by Aevitas and are charged directly by the product sponsor, broker/dealer or the Custodian. Aevitas does not share in any portion of these fees.

In addition, all fees paid to Aevitas for investment management services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Aevitas to fully understand the total fees to be paid.

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

#### Investment Management Services

The investment management fee is billed quarterly in arrears. The Fee will be based on the value of the account[s] on the last business day of each calendar quarter. If a Client's account does not contain sufficient funds to pay the investment management fee, we have the limited authority to sell or redeem securities in sufficient amounts to pay the fee. Except for ERISA and IRA accounts, you may reimburse your account[s] for investment management fees paid to Aevitas.

You may terminate investment management services obtained from Aevitas, without penalty, upon verbal or written notice within five (5) business days after entering into the advisory agreement with Aevitas. You will, however, be responsible for any fees and charges incurred from third parties as a result of maintaining your account[s], such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment management services with prior verbal or written notice to Aevitas. If you terminate investment management services during a quarter, you will be charged a pro-rata portion of the fee for the quarter up to and including the effective date of termination.

#### Financial Planning Services

You may terminate financial planning services within five (5) business days after entering into the financial planning agreement without penalty. After five (5) business days of entering into the financial planning agreement, you may terminate the agreement, but will be responsible for the cost of services performed to date at either the Advisor's agreed-upon hourly rate or the percentage completion of the engagement.

#### Retirement Plan Advisory Services Fees

Either party may request to terminate their services with Aevitas whole or in part, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written approval.

#### Compensation for Sales of Securities

Aevitas does not buy or sell securities for commissions and does not receive any compensation for securities transactions in any Client account[s], other than the investment management fees noted herein.

### **ITEM 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT**

Aevitas does not charge performance-based fees for its investment management services. The fees charged by Aevitas are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. Aevitas does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **ITEM 7 - TYPES OF CLIENTS**

The advisory services offered by Aevitas are geared toward individuals and their families including high net worth (i.e., clients with a net worth of \$1,500,000) individuals, pension and profit sharing plans, charitable organizations and other corporate entities.

The Advisor generally does not impose a minimum account size. Clients should be aware that performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised. Performance of smaller accounts may vary from the performance of accounts with more dollars invested since fluctuations in the market may affect smaller accounts more.

### **ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

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

Aevitas conducts economic analysis and attempts to analyze and determine the trends. Additionally, Aevitas conducts fundamental analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Other security analysis methods may include charting,

technical and cyclical analysis. Investment strategies vary based on each Client's goals, risk tolerance, etc. However, we use third party analysis of securities from various sources including Morningstar, S & P 500, Thompson and others.

## **B. Risk of Loss**

You need to understand that investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in any of the management programs offered by Aevitas requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your account[s]. Market values of investments will always fluctuate based on market conditions. We attempt to minimize the effects of market fluctuation by providing regular rebalancing to your portfolio.

We do not represent, warrant or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Aevitas or our Advisory Representatives will provide a better return than other investment strategies.

As stated above in Item 5, Aevitas uses often mutual funds and ETFs in Client portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the Custodian mails directly to the Client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the Client's request, at any time, Aevitas will direct the Client to the appropriate Web page to access the prospectus. The risks with ETFs include the fact that many foreign countries do not offer ETFs therefore international exposure for your portfolio may be limited; actively traded ETFs can create increased trading expenses and fees and the intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. ETFs are usually easy to buy and sell.

## **ITEM 9 - DISCIPLINARY INFORMATION**

There are no legal, regulatory or disciplinary events involving Aevitas or any of its employees. Aevitas and its Advisory Representatives value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are disclosed on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select Investment Adviser Search from the left navigation menu and then select the option for Firm and enter 143873 in the field labeled "Firm Name or IARD# or CRD#". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

## **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### Insurance Affiliations

Certain Advisory Representatives are also licensed insurance professionals. You are not obligated to purchase insurance products through an Advisory Representative. However, if you implement insurance recommendations through an Advisory Representative, he/she will receive commissions from the insurance company whose product[s] were sold. Implementation of insurance recommendations do not offset investment management or financial planning fees. Clients are not obligated to implement any recommendations through the Advisor or an Advisory Representative. Implementation of insurance recommendations represent less than 5% of the Advisor's revenue.

## **ITEM 11 - CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and PERSONAL TRADING**

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

Aevitas has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Aevitas takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy, which details our procedures for handling your personal information. Aevitas maintains a "Code of Ethics" for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes the Advisor's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

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

Neither Aevitas nor its Advisory Representatives recommend to Clients, or buys or sells for Client accounts, any securities in which we have a material financial interest. In very limited circumstances, Aevitas or its Advisory Representatives may purchase a security from a Client where a security being sold in the Client's account[s] as part of their investment strategy. This "principal trade" is not a typical business practice of Aevitas and is implemented solely to benefit the Client. In all such instances, an independent price is obtained from the Client's Custodian and the price is evaluated to ensure the Client receives a price that is equal to or more favorable than the price that would otherwise be obtained.

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

Aevitas and its employees may buy or sell securities identical to those securities recommended to you. Therefore, Aevitas and/or its employees may have an interest or position in certain securities that are also recommended and bought or sold to you. They will not put their interests before your interests at any time. Neither Aevitas nor any employee may trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

### **D. Personal Trading at the Same Time as Clients**

Aevitas is required to maintain a list of all securities holdings for its employees and develop procedures to supervise the trading activities of its employees and their immediate family who have

knowledge of your transactions. Further, employees are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. Aevitas and its employees are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

## **ITEM 12 - BROKERAGE PRACTICES**

### **A. Recommendation of Custodians**

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

Where Aevitas does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for execution and/or custodial services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker not recommended by Aevitas. Aevitas may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, reputation, and location of the Custodian's offices. Aevitas does not receive research services, other products, or compensation as a result of recommending a particular broker-dealer/custodian that may result in the Client paying higher commissions than those obtainable through others. Aevitas typically recommends that Clients establish their brokerage accounts at Fidelity Investments, Inc. and its related entities (collectively "Fidelity"), where Aevitas maintains an institutional advisor relationship (Please see Item 14). In addition, the Advisor may recommend that a Client establish their account[s] directly with one or more mutual fund companies.

In initially selecting Fidelity, Aevitas conducted due diligence. Our evaluation and criteria included ability to service you, staying power as a company, industry reputation, ability to report to you and to us, trading platform, products and services available, technology resources, and educational resources. Periodically, we will review alternative broker/dealers and custodians in the marketplace to ensure Fidelity are meeting our duty to provide best execution for your accounts. The review will include a comparison of both firms, which involves evaluating criteria such as overall expertise, cost competitiveness and financial condition. The quality of execution by Fidelity will be reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

Additionally, product sponsors such as variable and investment companies and limited partnerships, which are recommended to you, may provide support to Aevitas and our Advisory Representatives. Such support includes research, educational information, and monetary support for due diligence trips and Client events.

We may partner with other financial planning firms, discount brokers, mutual funds companies and other financial institutions to sponsor educational workshops. Seminars do not involve the sale of

any investment products and are purely educational. Any cash benefits received from a sponsorship partners would be strictly to help offset the expenses associated with bringing the financial education seminars to the public. Such expenses include ads in local newspapers, conference room rentals, seminar material, etc. All sponsors share in expenses.

There is an incentive for Aevitas and your Advisory Representative to recommend Fidelity over other broker-dealers based on the products and services that we will receive rather than your best interest.

As noted above, we have an arrangement with Fidelity for our Investment Management Services. The Fidelity institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform provides services that assist us in managing and administering Client accounts, including software and other technology that: (i) provide access to Client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple Client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from Client accounts; and (v) assist with back-office functions, recordkeeping and Client reporting.

Fidelity also offers other services intended to help Aevitas manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom we may contract directly.

Fidelity generally does not charge separately for custody services and is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

#### **A. Aggregating and Allocating Trades**

Due to the individual management of Client accounts, typically Aevitas does not aggregate the purchase or sale of securities for various Client accounts. When deemed appropriate, Aevitas may aggregate orders of one security for several accounts at once. This results in an average price/share for all accounts included in the trade. Aggregated orders will not reduce the transaction costs to participating Clients. We shall aggregate transactions in a manner designed to ensure that no participating Client is favored over another Client. If the aggregate order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated pro-rata to the participating Client accounts in proportion to the size of the orders placed for each account.

#### **B. Other Trading Practices**

Under limited circumstances, Aevitas may engage in securities cross-trades, whereby a Client account that is selling a particular security may be advantageous to the account[s] of one or more

other Clients. In such instances, Aevitas will only engage in a cross-trade that is in the best interests of each Client and will never engage in any transaction that favors one Client over another. Aevitas does not serve in the capacity as broker or agent in such transactions and does not receive any commission or compensation (aside from its investment management fees). The price for a cross-trade is determined solely by the Custodian and not Aevitas.

## **ITEM 13 - REVIEW OF ACCOUNTS**

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

Investments in Client accounts will be reviewed on an on-going basis. Advisory Representatives of the Advisor will attempt to conduct reviews with you quarterly or as agreed between and your Advisory Representative. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him or her to review the portfolio allocation and make recommendations for changes.

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

Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

### **C. Review Reports**

You will be provided statements at least quarterly direct from the Custodian. Additionally, you will receive confirmations of all transactions occurring direct from the Custodian. Further, depending on the services you request, your Advisory Representative may provide account holding and/or performance reports reflecting the holdings in your account and the value of the securities. Such reports will be provided at a frequency you requested. You should compare the report with statements received direct from the Custodian. Should there be any discrepancy the Custodian's report will prevail.

If you have engaged us for financial planning services only, you will not receive regular reviews. Aevitas recommends you have at least an annual review and update to any Plan. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

## **ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

A. Product vendors recommended by Aevitas may provide monetary and non-monetary assistance with Client events, provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Our due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest, but a benefit for you and us.

## B. Participation in Institutional Advisor Platform

As noted in Item 12 above, Aevitas has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Aevitas does not directly or indirectly compensate any person who is not a supervised person of Aevitas for referrals. Further, we do not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

Lastly, we do not compensate any person or entity for referring business to Aevitas.

## **ITEM 15 - CUSTODY**

Aevitas does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified custodian. Clients are required to engage the Custodian to retain their funds and securities and direct Aevitas to utilize the Custodian for the Client's security transactions. Aevitas encourages Clients to review statements provided by the Advisor to the account statements provided by the Custodian to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **ITEM 16 - INVESTMENT DISCRETION**

Aevitas primarily manages Client accounts on a discretionary basis. You will grant such authority to Aevitas by execution of the advisory agreement and may terminate the discretionary authorization at any time by giving us written notice.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account[s] should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account[s];



- 3) With the exception of deduction of Aevitas's investment management fees from the account[s], if you have authorized automatic deductions, we will not have the ability to withdraw your funds or securities from the account.

## **ITEM 17 - VOTING CLIENT SECURITIES**

Aevitas does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact your Advisory Representative about questions you may have and opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

## **ITEM 18 - FINANCIAL INFORMATION**

Aevitas will not require you to prepay more than \$1,200 and six or more months in advance of receiving advisory services; therefore, a balance sheet is not required.

Aevitas has discretionary authority over Client accounts; however that authority does not extend to the withdrawal of any Client assets, with the exception of deduction of Aevitas' investment management fees from your account[s]. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other Client.

Neither Aevitas nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

**Form ADV Part 2B - Brochure Supplement**  
**for**

**Michael A. Schreiber**  
**President and Chief Compliance Officer**

**January 12, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about Michael A. Schreiber that supplements the Aevitas Wealth Management, Inc. Disclosure Brochure. You should have received a copy of this Disclosure Brochure. Please contact Aevitas at (781) 239-1180 if you did not receive this Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Aevitas is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable CRD number for Michael A. Schreiber is 1659555.

Aevitas Wealth Management, Inc.  
10 Laurel Avenue, Suite 100  
Wellesley Hills, MA 02481  
Phone: 781-239-1180 ♦ Fax: 339-686-3094  
[www.aevitaswm.com](http://www.aevitaswm.com)

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Michael A. Schreiber**

*Year of Birth:* 1960

*Education:*

Name of School	Years Attended	Year Graduated	Degree	Major
Boston University	1978 to 1982	1982	BS	Communications

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc.)	Registered Investment Advisor	President & Chief Compliance Officer	05/2007 to Present
LPL Financial LLC	Broker/Dealer	Registered Representative	09/2009 to 10/2014
Mutual Service Corporation	Broker/Dealer / Investment Advisor	Registered Representative Advisory Representative	12/2005 to 09/2009
AXA Advisors, LLC	Broker/Dealer / Investment Advisor	Registered Representative Advisory Representative	04/1987 to 12/2005

## ITEM 3 - DISCIPLINARY INFORMATION

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There are no legal, civil or disciplinary events to disclose regarding Mr. Schreiber. Mr. Schreiber has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Schreiber. However, we do encourage you to independently view the background of Mr. Schreiber on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by entering 1659555 (Mr. Schreiber's CRD#).

**ITEM 4 - OTHER BUSINESS ACTIVITIES**

Mr. Schreiber is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with the Advisor. You are not obligated to purchase insurance or securities products through Mr. Schreiber. However, if you implement insurance recommendations through him, he will receive commissions from the insurance company whose product[s] were sold. The insurance business comprises less than 5% of his business time. The amount of income he receives from insurance business will fluctuate depending on the amount of sales. There may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Mr. Schreiber.

**ITEM 5 - ADDITIONAL COMPENSATION**

Mr. Schreiber has additional business activities where compensation is received. These business activities are detailed above in Item 4 above.

**ITEM 6 - SUPERVISION**

Michael A. Schreiber is the President and the Chief Compliance Officer of Aevitas and supervises all activities conducted through Aevitas. He maintains policies and procedures to guide his activities and adheres to a Code of Ethics. Mr. Schreiber may be contacted at 781-239-1180.

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

**for**

**Amy Z. Resnic  
Financial Advisor**

**January 12, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about Amy Z. Resnic that supplements the Aevitas Wealth Management, Inc. (“Aevitas”) Disclosure Brochure. You should have received a copy of this Disclosure Brochure. Please contact Aevitas at (781) 239-1180 if you did not receive this Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Aevitas is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable CRD number for Amy Z. Resnic is 2382217.

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10 Laurel Avenue, Suite 100  
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[www.aevitaswm.com](http://www.aevitaswm.com)

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Amy Z. Resnic**

*Year of Birth:* 1970

*Education:*

Name of School	Years Attended	Year Graduated	Degree	Major
Clark University	1988 to 1992	1992	BA	Economics

*Business Background:*

Name of Employer	Type of Business	Title	Period of Employment
Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc.)	Registered Investment Advisor	Financial Advisor and Office Manager	01/2012 to Present
Colman Knight	Investment Advisor	Assistant	09/2011 to 12/2011
Fidelity Investments	Financial Services	Senior Trust Officer	01/1996 to 08/2003
Shawmut Bank	Banking Services	Trust Officer	07/1992 to 12/1995

## ITEM 3 - DISCIPLINARY INFORMATION

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There are no legal, civil or disciplinary events to disclose regarding Ms. Resnic has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Resnic. However, we do encourage you to independently view the background of Ms. Resnic on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by entering 2382217 (Ms. Resnic's CRD#).

**ITEM 4 - OTHER BUSINESS ACTIVITIES**

Ms. Resnic is dedicated to the investment advisory activities of Aevitas's Clients and does not have any other business activities.

**ITEM 5 - ADDITIONAL COMPENSATION**

Ms. Resnic does not have additional business activities where compensation is received.

**ITEM 6 - SUPERVISION**

Amy Z. Resnic is a Financial Advisor of Aevitas. Supervision and oversight of the activities conducted through Aevitas are conducted by Michael Schreiber, President and Chief Compliance Officer. Mr. Schreiber can be contacted at (781) 239-1180.

Mr. Schreiber reviews transactions conducted in Client accounts. Additionally, all account information required to establish an account for a Client must flow through Mr. Schreiber. Mr. Schreiber and Aevitas have procedures in place to be aware of any outside business activities engaged in by Ms. Resnic, oversee her communications with the public, and review her personal trading activities as well as any account[s] over which she has direct or indirect beneficial interest.

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

**for**

**Ellen K. Duffy, CFP®  
Financial Advisor**

**January 12, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about Ellen K. Duffy that supplements the Aevitas Wealth Management, Inc. (“Aevitas”) Disclosure Brochure. You should have received a copy of this Disclosure Brochure. Please contact Aevitas at (781) 239-1180 if you did not receive this Disclosure Brochure or if you have any questions about the contents of this Brochure Supplement.

Ms. Duffy may also conduct business under the “doing business as” name **Parkway Wealth Management**.

Additional information about Ellen Duffy is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable CRD number for Ellen Duffy is 1275441.

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[www.aevitaswm.com](http://www.aevitaswm.com)



## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Ellen Katherine Duffy, CFP®**

*Year of Birth:* 1967

*Education:*

Name of School	Years Attended	Certification	Year of Certification
College for Financial Planning	1997 to 2003	CERTIFIED FINANCIAL PLANNER®	2006
Merrimack College, School of Professional Education	2004 to 2006		

\*The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Develop their theoretical and practical knowledge by completing a comprehensive course of study at a college or university offering a financial planning curriculum approved by CFP Board. Applicants may also satisfy the education requirement by submitting a transcript review or previous financial plan-related course work. Or, they can show that they have attained certain professional designations or academic degrees that cover the important in CFP Board’s financial planning curriculum. CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

*Business Background:*

<b>Name of Employer</b>	<b>Type of Business</b>	<b>Title</b>	<b>Period of Employment</b>
Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc.)  Parkway Wealth Management (DBA name)	Registered Investment Advisor	Financial Advisor	01/2013 to Present
LPL Financial LLC	Broker/Dealer	Registered Representative	01/2013 to 06/2014
Ameriprise Financial Services, Inc.	Broker/Dealer	Paraplanner; Registered Representative	02/2012 to 12/2012
Independent Consultant	Financial Services	Independent Consultant	07/2011 to 02/2012
LPL Financial Corporation	Broker/Dealer	Vice President, Corporate Sponsor Relations	05/2008 to 03/2011
Merrimack College, School of Professional Education	Obtained CFP® certification and pursued non-investment-related, personal goals	Student/Homemaker	01/2002 to 05/2008
Eaton Vance Distributors	Financial Services	Vice President	01/1994 to 12/2001

### **ITEM 3 - DISCIPLINARY INFORMATION**

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

There are no legal, civil or disciplinary events to disclose regarding Ms. Duffy has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Duffy. However, we do encourage you to independently view the background of Ms. Resnic on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by entering 1275441 (Ms. Duffy's CRD#).

### **ITEM 4 - OTHER BUSINESS ACTIVITIES**

Ms. Duffy is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from her role with the Advisor. You are not obligated to purchase insurance or securities products through Ms. Duffy. However, if you implement insurance recommendations through him, he will receive commissions from the insurance company whose product[s] were sold. The insurance business comprises less than 5% of his business time. The amount of income he receives from insurance business will fluctuate depending on the amount of sales. There may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Ms. Duffy.

Additionally, Ms. Duffy owns investment real estate. The rental property comprises 10% of her income. Ms. Duffy devotes approximately 1% of her time to this activity.

### **ITEM 5 - ADDITIONAL COMPENSATION**

Ms. Duffy receives compensation from her rental properties.

### **ITEM 6 - SUPERVISION**

Ms. Duffy is a Financial Advisor of Aevitas. Supervision and oversight of the activities conducted through Aevitas is conducted by Michael Schreiber, President and Chief Compliance Officer. Mr. Schreiber can be contacted at (781) 239-1180.

Mr. Schreiber reviews transactions conducted in clients' accounts. Additionally, all account information required to establish an account for a Client must flow through Mr. Schreiber. Mr. Schreiber and Aevitas have procedures in place to be aware of any outside business activities engaged in by Ms. Duffy, oversee her communications with the public, and review her personal trading activities as well as any account over which she has direct or indirect beneficial interest.

# Privacy Policy

Effective: January 12, 2017

## Our Commitment to You

Aevitas Wealth Management, Inc. (formerly Michael A. Schreiber & Associates, Inc. and herein “Aevitas”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor.

Aevitas (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust.

Aevitas does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you, as discussed below.

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

## Why you need to know?

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

## What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

## What sources do we collect information from in addition to you?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

## How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, as well as secured files and buildings. Our employees are advised about Aevitas's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities and require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

## How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Sharing	Limitations
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Aevitas may share this information.	Clients cannot limit the Advisor's ability to share.
<b>Administrators</b> We may disclose your non-public personal information to companies we hire to help administer our business. Companies that we hire to provide services of this nature are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	Aevitas may share this information.	Clients cannot limit the Advisor's ability to share.
<b>Marketing Purposes</b> Aevitas does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Aevitas or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	Aevitas does not share personal information.	Clients cannot limit the Advisor's ability to share.
<b>Authorized Users</b> In addition, your non-public personal information may also be disclosed to you and persons that we believe to be your authorized agent or representative.	Aevitas does share personal information.	Clients can limit the Advisor's ability to share.
<b>Information About Former Clients</b> Aevitas does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	Aevitas does not share personal information regarding former clients	Clients can limit the Advisor's ability to share.

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

### **State-specific Regulations**

### **Changes to our Privacy Policy**

We will send you a notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Any Questions?** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (781) 239-1180.