

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049
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Hours per response.....4.07

Name of Investment Adviser:

Palmetto Wealth Management, LLC

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

6970 Grate Park Drive**New Albany****OH****43054****(843) 589-9535**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV**Part II - Page 2**

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801-N/A

Date:

09/03/2009**1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.
(See instruction below.)**Applicant:**

- | | | | |
|-------------------------------------|-----|---|---------------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services | <u>25%</u> |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | <u> </u> % |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | <u>25%</u> |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | <u> </u> % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | <u> </u> % |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | <u> </u> % |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | <u>25%</u> |
| <input type="checkbox"/> | (8) | Provides a timing service | <u> </u> % |
| <input checked="" type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | <u>25%</u> |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- | | | | |
|-----------|---|---|-----------------------------|
| B. | Does applicant call any of the services it checked above financial planning or some similar term? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|-----------|---|---|-----------------------------|

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 3**

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801- **N/A**

Date:

09/03/2009**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | I. Options contracts on: |
| <input checked="" type="checkbox"/> (3) foreign issues | <input checked="" type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | J. Futures contracts on: |
| | <input type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> C. Corporate debt securities
(other than commercial paper) | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (2) oil and gas interests |
| | <input type="checkbox"/> (3) other (explain on Schedule F) |
| G. Investment company securities: | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (1) variable life insurance | |
| <input checked="" type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered
options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 4**

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801-N/A

Date:

09/03/2009**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?

Yes No
☒ ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV
Part II - Page 5

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801- **N/A**

Date:

09/03/2009
9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Refer to Schedule F, Item 11.A.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Refer to Schedule F, Item 11.B.
Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801-N/A

Date:

09/03/2009

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ?

Yes No

☒ ☐

(3) broker or dealer to be used ?

Yes No

☐ ☒

(4) commission rates paid?

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients?

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?

Yes No

☒ ☐

B. directly or indirectly compensates any person for client referrals?

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?

Yes No

☐ ☒

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request										
Item of Form (identify)	Answer											
Item 1.D.	<p><u>Advisory Services and Fees</u></p> <p>Palmetto Wealth Management, LLC (hereinafter "Palmetto Wealth" or the "Firm") offers investment advisory services to individuals, pension and profit sharing plans, trusts estates and charitable organizations, corporations and other business entities. The Firm's services and fee arrangements are described in the following pages.</p> <p>Palmetto Wealth is a limited liability company organized under the laws of the state of Ohio. This Schedule F narrative provides clients with information regarding Palmetto Wealth and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of Palmetto Wealth.</p> <p>Please contact John Gustafson, Managing Member/Chief Compliance Officer, if you have any questions about this Schedule F narrative. Additional information about Palmetto Wealth is available on the Internet at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Palmetto Wealth is 150648.</p> <p>Individuals associated with Palmetto Wealth will provide the Firm's investment advisory services. These individuals are appropriately licensed, qualified, and/or authorized to provide advisory services on the Firm's behalf. Such individuals are known as Investment Adviser Representatives (IARs).</p> <p><u>Portfolio Management Services</u></p> <p>Palmetto Wealth provides discretionary and non-discretionary portfolio management services where the investment advice provided is tailored to meet the needs and investment objectives of the client. At the inception of the relationship, Palmetto Wealth will gather information from the client such as the client's risk tolerance, investment objectives and other relevant information and will recommend an initial portfolio to the client.</p> <p>Pursuant to a grant of discretionary authority, subject to any written guidelines or restrictions the client may set, Palmetto Wealth executes transactions without further approval from the client. Such functions include the determination of securities and amount of securities to be purchased/sold. Once the initial portfolio is constructed, Palmetto Wealth monitors the account on a continuous basis and re-balances the portfolio as changes in market conditions and client circumstances may require. For non-discretionary accounts, Palmetto Wealth will contact the client prior to executing any transactions.</p> <p>Portfolio Management Fees are billed quarterly in advance based on the value of the client's account at the end of the previous quarter and based on the following negotiable tiered fee schedule:</p> <table border="0"> <tr> <td>Account Size</td> <td>Maximum Annualized Fee**</td> </tr> <tr> <td>\$0 to \$250,000</td> <td>1.50%</td> </tr> <tr> <td>\$250,001 to \$1,000,000</td> <td>1.25%</td> </tr> <tr> <td>\$1,000,001 to \$5,000,000</td> <td>1.00%</td> </tr> <tr> <td>Over \$5,000,000</td> <td>Negotiable</td> </tr> </table> <p>**Clients of the Firm may be charged lower fees than those stated above.</p> <p>The Firm may allow accounts of members of the same household to be aggregated for purposes of meeting the minimum account size or fee breakpoints. Palmetto Wealth may</p>		Account Size	Maximum Annualized Fee**	\$0 to \$250,000	1.50%	\$250,001 to \$1,000,000	1.25%	\$1,000,001 to \$5,000,000	1.00%	Over \$5,000,000	Negotiable
Account Size	Maximum Annualized Fee**											
\$0 to \$250,000	1.50%											
\$250,001 to \$1,000,000	1.25%											
\$1,000,001 to \$5,000,000	1.00%											
Over \$5,000,000	Negotiable											

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
Item of Form (identify)	Answer	
Item 1.D. (continued)	<p>allow such aggregation, for example, where the Firm services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts.</p> <p>Payment of Palmetto Wealth's management fees will be paid by the qualified custodian holding the client's funds and securities provided the client supplies written authorization permitting the fees to be paid directly from the account. Palmetto Wealth will not have access to client funds for payment of fees without written consent by the client. Further, the qualified custodian agrees to deliver an account statement, at least quarterly, directly to the client, showing all disbursements from the account. The client is encouraged to review all account statements for accuracy. Palmetto Wealth will receive a duplicate copy of the statement that was delivered to the client.</p> <p>Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. Palmetto Wealth or the client may terminate the management agreement within five days of the date of acceptance without penalty to the client. After the five-day period, either party, upon receipt of notice from the other, may terminate the management agreement. In the event of termination, fees will be charged on a pro-rata basis and any unearned fees will be refunded to the client on pro-rata basis.</p> <p><u>Financial Planning Services</u></p> <p>Palmetto Wealth engages in broad based and modular financial planning services for a fee. Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of their individual needs. An IAR of Palmetto Wealth will first conduct a complimentary initial consultation. During or after the initial consultation, if the client decides to engage the Firm for financial planning services, additional meetings will be conducted during which pertinent information about the client's financial circumstances and objectives is collected. Once such information has been reviewed and analyzed, a written financial plan designed to achieve the client's stated financial goals and objectives may be produced and presented to the client. The primary objective of this process is to allow the Firm to assist the client in developing a strategy for the successful management of income, assets and liabilities in meeting the client's financial goals and objectives.</p> <p>Financial plans are based on the client's financial situation at the time the plan is presented and are based on the financial information disclosed by the client to the Firm. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. Palmetto Wealth cannot offer any guarantees or promises that the client's financial goals and objectives will be met. As the client's financial situation, goals, objectives, or needs change, the client must notify the Firm promptly.</p> <p>For financial planning services, Palmetto Wealth charges a negotiable hourly fee ranging between \$150 and \$300 and will be due and payable upon completion of the services rendered. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances the cost/time could potentially exceed the initial estimate. In such cases, the Firm will notify the client and may request that the client approve the additional fee. For clients who retain the Firm to provide portfolio management</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
Item of Form (identify)	Answer	
Item 1.D. (continued)	<p>services, Palmetto Wealth may, in its sole discretion, provide planning services for reduced fees and/or may waive the planning fee in its entirety. Fees and fee paying arrangements will be determined on a case-by-case basis depending on the scope and complexity of the services to be performed.</p> <p>Either party may terminate the financial planning arrangement within five business days after the date when all parties have signed the agreement without penalty. After this five-day period, either party may terminate the arrangement upon receipt of notice to the other. In the event of termination, clients will be charged for the portion of work performed.</p> <p><u>Selection of Other Advisers</u></p> <p>Palmetto Wealth may refer its clients to various third-party investment advisers (TPAs) for portfolio management services. After gathering information about a client's financial situation and investment objectives, an IAR may assist the client in selecting a particular third-party adviser/program. Palmetto Wealth utilizes a number of factors in determining which third-party investment advisers to refer clients to including but not limited to performance, investment objectives, fees and methods of analysis. Third party investment advisers to which Palmetto Wealth refers its clients may not achieve the best rate of returns or charge the lowest fees in comparison to other third-party investment advisers.</p> <p>Fees paid by the client to third-party investment advisers are established and payable in accordance with the Form ADV Part II or other equivalent disclosure document provided by each third-party investment adviser to whom Palmetto Wealth refers its clients, and may or may not be negotiable. Fees charged by third party advisers are separate and apart from the fees charged by Palmetto Wealth and Palmetto Wealth will include the assets under management by the third party adviser when calculating its advisory fee. Clients who are referred to third-party investment advisers will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant third-party investment adviser's Form ADV Part II or equivalent disclosure document. Palmetto Wealth will monitor the performance of the third-party investment adviser on at least a quarterly basis and will make recommendations as necessary.</p> <p>Clients will be required to sign investment advisory agreements with the third-party investment adviser of the program selected. The client or third-party investment adviser, in accordance with the provisions of those agreements, may terminate the advisory relationship.</p> <p><u>General Information on Advisory Services and Fees</u></p> <p>Palmetto Wealth does not represent, warrant, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.</p> <p>Palmetto Wealth shall never have custody of any client funds or securities, as the services of a qualified and independent custodian will be used for these asset management services.</p> <p>Advice offered by Palmetto Wealth may involve investments in mutual funds. Clients are hereby advised that all fees paid to Palmetto Wealth for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges</p>	
Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).		

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
Item of Form (identify)	Answer	
Item 3.L.	<p>involved with purchasing or selling of securities. Palmetto Wealth does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by mutual funds, Palmetto Wealth, and others to fully understand the total amount of fees to be paid by the client.</p> <p><u>Types of Investments</u> Palmetto Wealth may provide advice on linked bonds, pooled investment vehicles or other structured products. In addition, Palmetto Wealth may provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship and reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives.</p>	
Item 4. A. (5), 4. B. (8), and 4. C. (7)	<p><u>Methods of Analysis, Sources of Information and Investment Strategies</u> Palmetto Wealth will refer Clients to TPAs who will provide advice to clients in accordance with the relevant program provided by the TPA. As disclosed above, Palmetto Wealth will assist clients in selecting TPAs whose investment programs and strategies have been reviewed by Palmetto Wealth and determined appropriate for Palmetto Wealth's clients based on their individual circumstances and investment goals.</p>	
Item 5.	<p><u>Education Requirements</u> IARs of Palmetto Wealth must meet all examination or experience requirements of the states/jurisdictions in which the individual provides advisory services.</p>	
Item 6.	<p><u>Education and Business Background</u> John Gustafson <i>Year of Birth:</i> 1971 <i>Formal Education after High School</i> - The Pennsylvania State University, BS, Marketing, 1992 <i>Business Background for the Previous Five Years:</i> - Palmetto Wealth Management, LLC, Managing Member/Chief Compliance Officer, 05/2009 to Present - UBS Financial Services, Inc., Registered Representative, 11/2001 to 07/2009</p>	
Item 7.C.	<p><u>Other Business Activities</u> John Gustafson is licensed to sell insurance products as an independent insurance agent. Mr. Gustafson, in his capacity as an independent insurance agent, sells insurance products to advisory clients and receives commissions for such sales. Clients are hereby advised that insurance commissions are separate and distinct from the advisory fees charged by the Firm. Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Gustafson in his separate capacity as an independent insurance agent. Mr. Gustafson spends the minority of his time devoted to insurance related activities.</p>	
Item 9.E.	<p><u>Participation or Interest in Client Transactions</u> From time to time, persons associated with Palmetto Wealth may buy or sell securities that are recommended to its clients or securities in which its clients are invested. It is the Firm's policy that associated persons of Palmetto Wealth shall not have priority over any client account in the purchase or sale of securities. Under certain circumstances, exceptions to the trading policy may be made.</p>	
Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).		

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
Item of Form (identify)	Answer	
	<p><u>Code of Ethics</u> Palmetto Wealth has adopted a Code of Ethics, the full text of which is available to clients and potential clients upon request. Palmetto Wealth strives to comply with all applicable laws and regulations governing its practices. Therefore, Palmetto Wealth has set forth guidelines for professional standards of conduct for its associated persons, the goal of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines. The Firm's Code of Ethics requires that certain associated persons submit personal securities transactions and holdings reports to Palmetto Wealth which will be reviewed by a qualified representative of Palmetto Wealth on periodic basis. Associated persons are also required to report any violations of the Firm's Code of Ethics. In addition, Palmetto Wealth maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about clients or their account holdings by Palmetto Wealth or any associated person.</p> <p><u>Privacy Policies</u> The Firm views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the Firm has instituted policies and procedures to ensure that customer information is kept private and secure.</p> <p>The Firm does not disclose any nonpublic personal information about its customers or former customers to any non-affiliated third parties, except as permitted by law. In the course of servicing a client's account, the Firm may share some information with its service providers, such as transfer agents, custodians and broker-dealers.</p> <p>The Firm restricts internal access to nonpublic personal information about the client to those employees who need to know that information in order to provide products or services to the client. As emphasized above, it has always been and will always be the Firm policy never to sell information about current or former customers or their accounts to anyone. It is also the Firm's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.</p> <p>A copy of the Firm privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, the Firm will deliver a copy of the current privacy policy notice to its clients on an annual basis.</p> <p><u>Conditions for Managing Accounts</u> For portfolio management services, Palmetto Wealth generally imposes a minimum account size of \$250,000. However, in its sole discretion, Palmetto Wealth may waive the minimum requirement.</p> <p><u>Review of Accounts</u> John Gustafson, Managing Member, will monitor accounts on a continuous basis and will conduct an internal formal review of accounts on at least a quarterly basis. Triggering factors that may stimulate a review include, but are not limited to, significant market corrections, news events on specific investments, large deposits or withdrawals from an account, substantial changes in the value of a client's portfolio and a change in the client's investment objectives.</p>	
Item 10.		
Item 11.A.		

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of**Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801- N/A

Date:

09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
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Item 11.B.	<u>Reports to Clients</u> For clients/households who have portfolio management accounts valued over \$250,000 Palmetto Wealth will provide quarterly performance reports. The first report will be provided after the first full quarter of inception of the account. Palmetto Wealth will provide clients who have accounts valued below \$250,000 with a performance summary/review, on at least an annual basis, and may provide other periodic reports, which will be determined on a case-by-case basis. In addition, clients will receive statements directly from their account custodian(s) on a quarterly basis.	
Item 12. A.(1),(2)	<u>Investment or Brokerage Discretion</u> Clients of the Firm may grant Palmetto Wealth complete discretion over the selection and amount of securities to be purchased or sold for their account without obtaining their prior consent or approval. However, Palmetto Wealth's investment authority may be subject to specified investment objectives, guidelines and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry.	
Item 12.B. Item 13.A.	<u>Suggestion of Brokers/Additional Compensation</u> Palmetto Wealth will recommend that Clients in need of brokerage and custodial services utilize Fidelity Brokerage Services, LLC ("Fidelity"), member NYSE and SIPC. Palmetto Wealth will not receive any portion of the brokerage commissions and/or transaction fees charged to the client. Palmetto Wealth has an arrangement with Fidelity through which Fidelity provides the Firm with Fidelity's platform services. The platform services may include, among others, research, software, brokerage, custodial, administrative support, record keeping and related services. Such research products and services are provided to all investment advisers who utilize Fidelity and are not considered to be paid for with soft dollars. However, the commissions charged by Fidelity might be greater than the amounts another broker who did not provide research services or products might charge. While Palmetto Wealth believes that Fidelity provides best execution, the commission rates/fees charged by Fidelity may be higher or lower than those charged by other broker-dealers. In determining whether Fidelity provides best execution, the Firm considers factors that it deems relevant, including, including among others, the value of research provided, reputation, execution capability, commission rates, responsiveness and the quality of service rendered. Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered. John Gustafson is licensed as independent insurance agent whereby he may sell insurance products from a variety of product sponsors and earn commissions from the sales of insurance products. However, clients are informed that they are under no obligation to transact insurance business through Mr. Gustafson in his capacity as a licensed insurance agent and may utilize the insurance agent of their choice.	

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Schedule F of**Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

Palmetto Wealth Management, LLC

SEC File Number:

801- N/A

Date:

09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Palmetto Wealth Management, LLC

IRS Empl. Ident.No.:

**Available Upon
Request**Item of Form
(identify)

Answer

Miscellaneous*Directed Brokerage*

In limited circumstances, clients may instruct Palmetto Wealth to use one or more particular brokers for the transactions in their accounts. Clients who may want to direct Palmetto Wealth to use a particular broker should understand that this might prevent Palmetto Wealth from effectively negotiating brokerage compensation and may also prevent Palmetto Wealth from obtaining the most favorable net price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses and execution, clearance, and settlement capabilities that they will obtain through their broker are adequately favorable in comparison to those that Palmetto Wealth would otherwise obtain for its clients. Clients are encouraged to discuss available alternatives with their advisory representative.

Proxy Voting

Palmetto Wealth will not take any action or render any advice with respect to voting of proxies solicited by, or with respect to, the issuers of securities in which client's assets may be invested. All proxy related materials received directly by Palmetto Wealth will be forwarded to the client for direct action.

Class Action Lawsuits

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. Palmetto Wealth has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. Palmetto Wealth also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, Palmetto Wealth has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by clients.

Where Palmetto Wealth receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms and other materials, to the client. Electronic mail is acceptable where appropriate, and the client has authorized contact in this manner.

Aggregation of Orders

Generally, for discretionary accounts, the Firm will aggregate orders with respect to the same security purchased for different clients. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs, based upon each account's participation in the transaction, subject to the Firm's discretion depending on factual or market conditions. Clients participating in block trading may include proprietary or related accounts. Such accounts are treated as client accounts and are neither given preferential nor inferior treatment versus other client accounts. Allocations of orders among client accounts must be made in a fair and equitable manner.

The Firm generally aggregates client transactions for discretionary accounts, but it may not aggregate transactions for non-discretionary accounts. Accordingly, clients are hereby advised that non-discretionary accounts may receive different prices for the same securities transactions than discretionary accounts. Additionally, clients who enter non-discretionary arrangements with the Firm may not be able to buy and sell the same quantities of

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**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Palmetto Wealth Management, LLC	801- N/A	09/03/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Palmetto Wealth Management, LLC		IRS Empl. Ident.No.: Available Upon Request
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	securities and may be charged higher commissions or fees than clients who enter into discretionary arrangements.	

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