



# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 4, 2013**

This Disclosure Brochure provides information about the qualifications and business practices of Connecticut Wealth Management, LLC (“CTWM”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

CTWM is a Registered Investment Advisor with the United States Securities and Exchange Commission. 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 about CTWM to assist you in determining whether to retain the Advisor.

Additional information about CTWM and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A and Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of CTWM.

CTWM believes that communication and transparency are the foundation of our relationships and continually strive to provide our Clients with complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### SEC Registration

CTWM has transitioned from registration with the State of Connecticut to registration with the U.S. Securities and Exchange Commission (“SEC”). CTWM has historically implemented investment management services through its Advisory Persons’ affiliation with LPL Financial. CTWM now provides these same investment management services directly under the registration of CTWM. The total value of the assets under management by CTWM exceeds the threshold to maintain state registration. Details on these services are provided in Item 4 below. The fees associated with the services are detailed in Item 5 below. Other important details about investment management services are provided throughout this Disclosure Brochure. If you have any questions on this change, please do contact us.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of CTWM.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for CTWM:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **154310** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also obtain a copy of this Disclosure Brochure on our website, [www.ctwealthmgmt.com](http://www.ctwealthmgmt.com) or request a copy by contacting us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Connecticut Wealth Management, LLC (“CTWM” or the “Advisor”) is a Registered Investment Advisor with the Securities and Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Connecticut. CTWM began operations on October 1, 2010, and is owned and operated by Managing Member Kevin Leahy and Member Denis Horrigan. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by CTWM.

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

CTWM offers financial planning and investment advisory services to individuals, trusts, estates, not-for profit organizations, business owners, businesses and executives in Connecticut and other states (each referred to as a “Client”).

#### Financial Planning and Consulting Services

CTWM will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Typically a financial plan will be comprehensive in nature, including all major aspects of a Client’s financial situation. Generally, such financial planning services will involve investment planning, retirement planning, personal savings, education savings, income tax planning, estate tax planning, cash flow analysis, and risk management including death, disability and long term care needs analysis.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. CTWM may also refer Clients to an accountant, insurance consultant, attorney or other specialist, as appropriate for their unique situation. For comprehensive financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within ninety days of the contract date, assuming all information and documents requested are promptly provided.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

#### Investment Management

CTWM provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. CTWM works with each Client to identify their investment goals and objectives, as well as risk tolerance and financial situation, in order to create a portfolio allocation. CTWM will then construct a portfolio, typically consisting of no-load mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, certificates of deposits, and alternative investments to meet the needs of its Clients.

CTWM’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. CTWM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client.

CTWM evaluates and selects investment vehicles for inclusion in Client portfolios only after applying their internal due diligence process. CTWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. CTWM may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio.

### Investment Management - continued

CTWM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, changes in Client circumstances or any risk deemed unacceptable for the Client's risk tolerance.

**Prior to rendering investment advisory services, CTWM will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].** CTWM will provide investment advisory services and portfolio management services and will not custody securities or provide other administrative services. At no time will CTWM accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account or pension account, pursuant to the Client Investment Advisory Agreement.

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

Prior to engaging CTWM to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – CTWM, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – CTWM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – CTWM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – CTWM will provide investment management and ongoing oversight of the Client's portfolio and overall account.

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

CTWM does not manage a wrap fee program. Investment management services are typically provided directly by CTWM. At times, certain Clients may be invested in a wrap fee program offered by LPL Financial. The details of this wrap fee program are provided in the wrap program brochure provided by LPL Financial.

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

As of the December 31, 2012 fiscal year end, CTWM manages \$227,189,346 in discretionary assets and \$13,779,427 in non-discretionary assets. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of CTWM and the Client.

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

#### Financial Planning and Consulting Services

CTWM offers financial planning or consulting services on a fixed fee basis ranging from \$4,000 to \$10,000, which may be negotiable depending on the nature and complexity of each Client's circumstances. The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses associated with implementing the plan, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The fixed fee is determined after considering many factors, such as the level and scope of the services.

### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 1.25% to 0.75% based on the following schedule:

Assets Under Management	Annual Rate
\$500,000 to \$1,000,000	1.25%
\$1,000,001 to \$2,500,000	1.10%
\$2,500,001 to \$5,000,000	0.90%
\$5,000,001 and over	0.75%

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by CTWM will be independently valued by the designated Custodian. CTWM will not have the authority or responsibility to value portfolio securities.

### **B. Fee Billing**

#### Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced 50% upon execution of the Engagement Letter and 50% upon completion of the planning engagement. Generally the financial plan will be completed within 90 days of the contract date, provided that all information needed to prepare the plan has been promptly provided by the Client.

### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor provides the fee amount to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with CTWM at the end of each prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's account statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting CTWM to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

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

Clients may incur certain fees or charges imposed by third parties, other than CTWM, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by CTWM is separate and distinct from these custodian and execution fees.

In addition, all fees paid to CTWM for investment advisory 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. A Client could invest in these products directly, without the services of CTWM, but would not receive the services provided by CTWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CTWM to fully understand the total fees to be paid.



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

### Financial Planning and Consulting Services

The Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement, in which case the Client will not incur any fees. After the five-day period, either party may terminate a planning or consulting agreement at anytime by providing written notice to the other party. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

### Account Portfolio Management

CTWM is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with CTWM, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

## **E. Compensation for Sales of Securities**

CTWM does not receive any compensation for securities transactions in any Client account other than the Investment Advisory Fees noted above.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

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CTWM does not charge performance-based fees for its investment advisory services. The fees charged by CTWM 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.

CTWM 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**

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CTWM provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Businesses and Not-For Profit Organizations – business entities, investing cash reserves and endowments

The relative percentage for each type of Client is available on CTWM's Form ADV Part 1. These percentages will change over time. CTWM generally requires a minimum household size of \$500,000 to effectively implement its investment process. CTWM may reduce this household minimum at its sole discretion.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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

CTWM primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from CTWM is derived from numerous sources, including third-party research materials, financial media companies, , Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

CTWM uses asset allocation strategy in managing clients' assets. Asset allocation helps drive the balance between risk and reward and it is important because, when investing in multiple asset classes, a portfolio may perform more consistently over time and it may minimize the risk of underperformance. Market conditions that can help one asset class to perform well may cause another to have average or poor returns over the same time period. A portfolio consisting of a diversified group of investments may be able to limit a client's losses and reduce the fluctuations of investment returns without sacrificing potential gain.

### **A. Methods of Analysis – continued**

As noted above, CTWM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. CTWM will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, CTWM may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. CTWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in Item 13.

Asset allocation helps drive the balance between risk and reward and it is important because, when investing in multiple asset classes, a portfolio may perform more consistently over time and it may minimize the risk of underperformance. While asset allocation may help reduce risk, it does not eliminate risk. All investments involve some degree of risk.

Each Client relationship will include a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's portfolio. The Advisor shall rely on all information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

CTWM may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. CTWM may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. In certain instances, CTWM's investment strategy may include active trading in concentrated portfolios.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (860) 470-0290 or via email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving CTWM or any of its employees.** CTWM and its advisory personnel 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 with whom you partner. Our backgrounds are 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 the option for Investment Adviser Firm and enter 154310 in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Kevin Leahy and Denis Horrigan by selecting the Investment Adviser Representative and entering Mr. Leahy's or Mr. Horrigan's Individual CRD#, 4245603 and 2214876 respectively, in the field labeled "Individual CRD Number".



## **Item 10 – Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer Affiliation**

Associated Persons of CTWM are also registered representatives of LPL Financial, LLC (“LPL”) of Boston, Massachusetts. LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In their separate capacity as registered representatives, associated persons of CTWM will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the associated persons. Neither the Advisor nor its associated persons will earn investment advisory fees in connection with any services implemented in their separate capacity as registered representatives where commissions are earned.

Generally, recommendations made by CTWM to its Clients are implemented by the associated persons in their role as an Investment Advisor Representatives, not in their role as a Registered Representative. In no circumstances will CTWM earn an advisory fee and a commission on the same investment.

In addition, as registered representatives of LPL, associated persons of CTWM may receive 12b-1 distributions from investment companies in connection with the placement of client funds into investment companies.

Clients should be aware that the receipt of additional compensation creates a conflict of interest when making recommendations.

### **Insurance Agency Affiliations**

Mr. Leahy, Managing Member of CTWM, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with CTWM. As an insurance agent, Mr. Leahy may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Leahy or the Advisor.

While the firm is licensed to sell insurance, it is not recommended and implemented by Mr. Leahy for all clients. Revenue from insurance commissions is not material to the advisor’s total revenue.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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

CTWM has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with CTWM. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. CTWM and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of CTWM associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. CTWM has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (860) 470-0290 or via email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

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

CTWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. CTWM does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. CTWM does not have a material interest in any securities traded in Client accounts.

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

CTWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

### D. Personal Trading at Same Time as Client

While CTWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades do not occur at the same time. CTWM will place trades only after Client orders have been placed and filled.

**At no time will CTWM or any associated person of CTWM, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

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

Where CTWM does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by CTWM. CTWM typically recommends to Clients that they established their brokerage account[s] at LPL Financial, LLC ("LPL"). LPL is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. LPL offers independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. CTWM receives some benefits from LPL through its relationship with them. CTWM considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **CTWM does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - CTWM does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where CTWM will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, CTWM will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. CTWM will execute its transactions through an unaffiliated broker-dealer approved by the Client. CTWM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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

Accounts are monitored on a regular and continuous basis by:

- Kevin C. Leahy, Managing Member and Chief Executive Officer;
- Denis M. Horrigan, Member;
- Patricia M. Kane, Director;
- Jarrett F. Solomon, Senior Financial Advisor;
- Kayse A. Kress, Financial Advisor; and
- Ryan P. Tuttle, Financial Advisor.

Formal reviews are generally conducted quarterly or more or less frequently depending on the needs of the Client.

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

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify CTWM if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive statements no less than quarterly from the trustee or custodian. These statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

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### **A. Compensation Received by CTWM**

#### Broker-Dealer Affiliation

Associated persons of CTWM are also registered representative of LPL Financial, LLC ("LPL") of Boston, Massachusetts. LPL is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In their separate capacity as registered representatives, associated persons of CTWM will typically receive commissions for the implementation of recommendations for commissionable transactions.

In addition, as registered representatives of LPL, associated persons of CTWM may receive 12b-1 distributions from investment companies in connection with the placement of client funds into investment companies.

### Insurance Agency Affiliations

Mr. Leahy, Managing Member of CTWM, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with the CTWM. As an insurance agent, Mr. Leahy may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

### **B. Client Referrals from Solicitors**

CTWM does not engage paid solicitors for Client referrals.

### Item 15 – Custody

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CTWM does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to approve the custodian to retain their funds and securities and direct CTWM to utilize that custodian for the Client's security transactions. CTWM encourages Clients to review statements provided by account custodian(s). For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

### Item 16 – Investment Discretion

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CTWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by CTWM. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by CTWM will be in accordance with each Client's investment objectives and goals.

### Item 17 – Voting Client Securities

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CTWM does not accept proxy-voting responsibility for any Client.

### Item 18 – Financial Information

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Neither CTWM, nor its management has any adverse financial situations that would reasonably impair the ability of CTWM to meet all obligations to its Clients. Neither CTWM, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. CTWM is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## Privacy Policy

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Effective: January 1, 2012

### Our Commitment to You

Connecticut Wealth Management, LLC ("CTWM") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. CTWM (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have. CTWM makes efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does CTWM provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include:

• Name and address	• Liabilities
• E-mail address	• Income
• Phone number	• Account balances
• Social security or taxpayer identification number	• Investment activity
• Assets	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a Client relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That CTWM Shares

CTWM works to provide products and services that benefit our Clients. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also 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. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy CTWM's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind 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.

**To repeat, we do not sell your non-public personal information to anyone.**

### Information About Former Clients

CTWM 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.

**Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our Clients' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

We will send you 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. You may obtain a copy of our current privacy policy by contacting us at (860) 470-0290 or via email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).





# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### **Form ADV Part 2B – Individual Disclosure Brochure**

for

**Kevin C. Leahy**  
**Chief Executive Officer**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Kevin C. Leahy (CRD# **4245603**) in addition to the information contained in the Connecticut Wealth Management, LLC (“CTWM” or the “Advisor” CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM’s Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Kevin C. Leahy is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

Kevin C. Leahy is the CEO of Connecticut Wealth Management, LLC. Mr. Leahy, born in 1971, is dedicated to serving the Clients of Connecticut Wealth Management, LLC.

Mr. Leahy earned a Masters of Science in Taxation with a concentration in Financial Planning from Northeastern University in 2000. In addition, Mr. Leahy earned a Bachelor's in Accounting from Providence College in 1993.

Mr. Leahy earned the CERTIFIED FINANCIAL PLANNER™, CFP® and the Certified Investment Management Analyst designations. Mr. Leahy is also a Certified Public Accountant ("CPA").

### **About the CFP® Designation**

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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.

### **About the Certified Investment Management Analyst (CIMA®)**

The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a

Registered Education Provider at an AACSB accredited university business school, pass an online Certification Examination, and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

The CIMA certification has earned ANSI® (American National Standards Institute) accreditation under the personnel certification program. The American National Standards Institute, or ANSI, is a private non-profit organization that facilitates standardization and conformity assessment activities in the United States. CIMA is the first financial services credential to meet this international standard for personnel certification.

Mr. Leahy has also earned the Certified Public Accountant ("CPA") designation. Details about this designation are listed below.

#### Certified Public Accountant ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Additional information regarding Mr. Leahy's employment history is included below.

#### **Employment History:**

CEO, Connecticut Wealth Management, LLC	10/2010 to Present
Registered Representative, LPL Financial	07/2001 to Present
CEO, KR Wealth Management	01/2009 to 09/2010
Member, KR Wealth Management	01/2007 to 09/2010
Director, KR Wealth Management	07/2001 to 01/2007

#### **Item 3 – Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding Mr. Leahy.*

Mr. Leahy 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. Leahy.

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. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Leahy.*

However, we do encourage you to independently view the background of Mr. Leahy on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4245603** in the field labeled "Individual CRD Number".

#### **Item 4 – Other Business Activities**

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##### Broker-Dealer Affiliation

Mr. Leahy is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Leahy will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Leahy. Neither the Advisor nor Mr. Leahy will earn investment advisory fees in connection with any services implemented in Mr. Leahy's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by CTWM to its Clients are implemented by Mr. Leahy in his role as an Investment Advisor Representative, not in his role as a Registered Representative. As such, Clients of CTWM only pay only advisory fees as described above. In no circumstances will CTWM earn an advisory fee and a commission on the same investment. In the event that Mr. Leahy earns a commission on an investment, the advisory fee will be waived by CTWM.

##### Insurance Agency Affiliations

Mr. Leahy, Managing Member of CTWM, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with CTWM. As an insurance agent, Mr. Leahy and may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Leahy or the Advisor.

While the firm is licensed to sell insurance, it is not recommended and implemented by Mr. Leahy for all clients. Revenue from insurance commissions represents less than 3% of the advisor's revenue.

#### **Item 5 – Additional Compensation**

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Mr. Leahy is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Leahy will typically receive commissions for the implementation of recommendations for commissionable transactions.

#### **Item 6 – Supervision**

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Mr. Leahy serves as the CEO and Chief Compliance Officer of CTWM. Mr. Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### Form ADV Part 2B – Individual Disclosure Brochure

for

**Denis M. Horrigan**  
**Member**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Denis M. Horrigan (CRD# **2214876**) in addition to the information contained in the Connecticut Wealth Management, LLC ("CTWM" or the "Advisor" CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM's Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Denis M. Horrigan is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Denis M. Horrigan is a Member of Connecticut Wealth Management, LLC. Mr. Horrigan, born in 1967, is dedicated to serving the Clients of Connecticut Wealth Management, LLC. Mr. Horrigan earned a Bachelor's degree in Sociology from Siena College in 1989 and is a CERTIFIED FINANCIAL PLANNER™, CFP®.

### About the CFP® Designation

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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.

Additional information regarding Mr. Horrigan's employment history is included below.

### **Employment History:**

Member, Connecticut Wealth Management, LLC	01/2011 to Present
Director, Connecticut Wealth Management	10/2010 to 12/2010
Registered Representative, LPL Financial	05/2008 to Present
Director, KR Wealth Management	03/2008 to 09/2010
Vice President of Client Services, St. Germain	03/2006 to 05/2008



### **Item 3 – Disciplinary Information**

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Horrigan.*

Mr. Horrigan 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. Horrigan.

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. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Horrigan.

However, we do encourage you to independently view the background of Mr. Horrigan on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 2214876 in the field labeled "Individual CRD Number".

### **Item 4 – Other Business Activities**

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#### Broker-Dealer Affiliation

Mr. Horrigan is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Horrigan will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Mr. Horrigan. Neither the Advisor nor Mr. Horrigan will earn investment advisory fees in connection with any services implemented in Mr. Horrigan's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by CTWM to its Clients are implemented by Mr. Horrigan in his role as an Investment Advisor Representative, not in his role as a Registered Representative. As such, Clients of CTWM only pay only advisory fees as described above. In no circumstances will CTWM earn an advisory fee and a commission on the same investment. In the event that Mr. Horrigan earns a commission on an investment, the advisory fee will be waived by CTWM.

### **Item 5 – Additional Compensation**

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Mr. Horrigan is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Horrigan will typically receive commissions for the implementation of recommendations for commissionable transactions.

### **Item 6 – Supervision**

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Mr. Horrigan serves as the Member of CTWM and is supervised by Kevin Leahy, the Chief Compliance Officer. Kevin Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# CONNECTICUT WEALTH MANAGEMENT, LLC

## Form ADV Part 2B – Individual Disclosure Brochure

for

**Patricia M. Kane  
Director**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Patricia M. Kane (CRD# 5131389) in addition to the information contained in the Connecticut Wealth Management, LLC ("CTWM" or the "Advisor" CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM's Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Patricia M. Kane is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Patricia M. Kane is a Senior Financial Advisor of Connecticut Wealth Management, LLC. Ms. Kane, born in 1958, is dedicated to serving the Clients of Connecticut Wealth Management, LLC. Ms. Kane earned a Master of Business Administration with a concentration in Finance from University of Connecticut in 2002. In addition, Ms. Kane earned a Bachelor's degree from University of Connecticut in 1987. Ms. Kane earned the CERTIFIED FINANCIAL PLANNER™, CFP® designation.

### About the CFP® Designation

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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. Additional information regarding Ms. Kane's employment history is included below.

### Employment History:

Director, Connecticut Wealth Management, LLC Financial Advisor	10/2011 to Present 10/2010 to 10/2011
Registered Representative, LPL Financial	06/2007 to Present
Senior Financial Advisor, KR Wealth Management	01/2010 to 09/2010
Financial Advisor, KR Wealth Management	04/2008 to 01/2010
Client Service Associate, KR Wealth Management	03/2006 to 04/2008

### Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Ms. Kane.*

Ms. Kane 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. Kane.

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. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Kane.*

However, we do encourage you to independently view the background of Ms. Kane on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **5131389** in the field labeled "Individual CRD Number".

### Item 4 – Other Business Activities

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Ms. Kane is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Kane will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Ms. Kane. Neither the Advisor nor Ms. Kane will earn investment advisory fees in connection with any services implemented in Ms. Kane's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by CTWM to its Clients are implemented by Ms. Kane in her role as an Investment Advisor Representative, not in her role as a Registered Representative. As such, Clients of CTWM only pay only advisory fees as described above. In no circumstances will CTWM earn an advisory fee and a commission on the same investment. In the event that Ms. Kane earns a commission on an investment, the advisory fee will be waived by CTWM.

### Item 5 – Additional Compensation

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Ms. Kane is also a registered representative of LPL Financial of Boston, Massachusetts. LPL Financial is a registered broker-dealer (CRD No. 6413), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Kane will typically receive commissions for the implementation of recommendations for commissionable transactions.

### Item 6 – Supervision

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Ms. Kane serves as the Senior Financial Advisor of CTWM and is supervised by Kevin Leahy, the Chief Compliance Officer. Kevin Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### Form ADV Part 2B – Individual Disclosure Brochure

for

**Jarrett F. Solomon**  
**Senior Financial Advisor**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Jarrett F. Solomon (CRD# **4693541**) in addition to the information contained in the Connecticut Wealth Management, LLC (“CTWM” or the “Advisor” CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM’s Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Jarrett F. Solomon is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

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Jarrett F. Solomon is a Senior Financial Advisor of Connecticut Wealth Management, LLC. Mr. Solomon, born in 1980, is dedicated to serving the Clients of Connecticut Wealth Management, LLC. Mr. Solomon earned a Bachelor's degree from Amherst College in 2003. Mr. Solomon earned the CERTIFIED FINANCIAL PLANNER™, CFP® and the Certified Investment Management Analyst designations.

### About the CFP® Designation

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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.

### About the Certified Investment Management Analyst (CIMA®)

The CIMA certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, pass an online Certification Examination, and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks.



CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA). The CIMA certification has earned ANSI® (American National Standards Institute) accreditation under the personnel certification program. The American National Standards Institute, or ANSI, is a private non-profit organization that facilitates standardization and conformity assessment activities in the United States. CIMA is the first financial services credential to meet this international standard for personnel certification.

Additional information regarding Mr. Solomon's employment history is included below.

**Employment History:**

Senior Financial Advisor, Connecticut Wealth Management, LLC	08/2011 to Present
Associate Director, Convergent Wealth Advisors	10/07 to 05/11
Senior Analyst, Convergent Wealth Advisors	04/07 to 10/07
Senior Analyst, Lydian Wealth Management	09/05 to 04/07

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**Item 3 – Disciplinary Information**

*There are no legal, civil or disciplinary events to disclose regarding Mr. Solomon.*

Mr. Solomon 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. Solomon.

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. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Solomon.*** However, we do encourage you to independently view the background of Mr. Solomon on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4693541** in the field labeled "Individual CRD Number".

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**Item 4 – Other Business Activities**

Mr. Solomon is a dedicated to the investment advisory activities of CTWM's Clients. Mr. Solomon does not have any other business activities.

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**Item 5 – Additional Compensation**

Mr. Solomon is a dedicated to the investment advisory activities of CTWM's Clients. Mr. Solomon does not receive any additional forms of compensation.

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**Item 6 – Supervision**

Mr. Solomon serves as the Senior Financial Advisor of CTWM and is supervised by Kevin Leahy, the Chief Compliance Officer. Kevin Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### Form ADV Part 2B – Individual Disclosure Brochure

for

**Kayse A. Kress**  
**Senior Financial Advisor**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Kayse A. Kress (CRD# **5060633**) in addition to the information contained in the Connecticut Wealth Management, LLC ("CTWM" or the "Advisor" CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM's Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Kayse A. Kress is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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Connecticut Wealth Management, LLC  
30 Waterside Drive, Suite 100 \* Farmington, CT 06032-3056  
Phone: (860) 470-0290 \* Fax: (860) 470-0289  
[www.ctwealthmgmt.com](http://www.ctwealthmgmt.com)

## Item 2 – Educational Background and Business Experience

Kayse A. Kress is a Senior Financial Advisor of Connecticut Wealth Management, LLC. Ms. Kress, born in 1984, is dedicated to serving the Clients of Connecticut Wealth Management, LLC. Ms. Kress earned a Bachelor's degree in Marketing from Central Connecticut State University in 2006. Ms. Kress earned the CERTIFIED FINANCIAL PLANNER™, CFP® designation.

### About the CFP® Designation

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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.

Additional information regarding Ms. Kress's employment history is included below.

### **Employment History:**

Senior Financial Advisor, Connecticut Wealth Management, LLC	10/2010 to Present
Registered Representative, LPL Financial	01/2010 to 12/2011
Financial Advisor, KR Wealth Management	01/2010 to 09/2010
Client Service Associate, KR Wealth Management	09/2005 to 01/2010

### Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Ms. Kress.*

Ms. Kress 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. Kress.

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. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Kress.*

However, we do encourage you to independently view the background of Ms. Kress on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **5060633** in the field labeled "Individual CRD Number".

### Item 4 – Other Business Activities

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Ms. Kress is a dedicated to the investment advisory activities of CTWM's Clients. Ms. Kress does not have any other business activities.

### Item 5 – Additional Compensation

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Ms. Kress is a dedicated to the investment advisory activities of CTWM's Clients. Ms. Kress does not receive any additional forms of compensation.

### Item 6 – Supervision

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Ms. Kress serves as the Senior Financial Advisor of CTWM and is supervised by Kevin Leahy, the Chief Compliance Officer. Kevin Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



# CONNECTICUT

## WEALTH MANAGEMENT, LLC

### **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Ryan P. Tuttle  
Senior Financial Advisor**

**Effective: April 4, 2013**

This Brochure Supplement provides information about the background and qualifications of Ryan P. Tuttle (CRD# 5013022) in addition to the information contained in the Connecticut Wealth Management, LLC (“CTWM” or the “Advisor” CRD #154310) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or CTWM’s Disclosure Brochure, please contact us at (860) 470-0290 or by email at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Additional information about Ryan P. Tuttle is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Ryan P. Tuttle is a Senior Financial Advisor of Connecticut Wealth Management, LLC. Mr. Tuttle, born in 1984, is dedicated to serving the Clients of Connecticut Wealth Management, LLC. Mr. Tuttle earned a Bachelor's degree in Business Administration with a focus in Finance from University of Connecticut (Storrs) in 2006. Mr. Tuttle earned the CERTIFIED FINANCIAL PLANNER™, CFP® designation.

### About the CFP® Designation

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 – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). 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.

Additional information regarding Mr. Tuttle's employment history is included below.

### **Employment History:**

Senior Financial Advisor, Connecticut Wealth Management, LLC	10/2010 to Present
Registered Representative, LPL Financial	01/2010 to 12/2011
Financial Advisor, KR Wealth Management	01/2010 to 09/2010
Client Service Associate, KR Wealth Management	06/2005 to 01/2010



### Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Tuttle.*

Mr. Tuttle 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. Tuttle.

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. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Tuttle.*

However, we do encourage you to independently view the background of Mr. Tuttle on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 5013022 in the field labeled "Individual CRD Number".

### Item 4 – Other Business Activities

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Mr. Tuttle is a dedicated to the investment advisory activities of CTWM's Clients. Mr. Tuttle does not have any other business activities.

### Item 5 – Additional Compensation

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Mr. Tuttle is a dedicated to the investment advisory activities of CTWM's Clients. Mr. Tuttle does not receive any additional forms of compensation.

### Item 6 – Supervision

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Mr. Tuttle serves as the Financial Advisor of CTWM and is supervised by Kevin Leahy, the Chief Compliance Officer. Kevin Leahy can be reached at (860) 470-0290.

CTWM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of CTWM. Further, CTWM is subject to regulatory oversight by various agencies. These agencies require registration by CTWM and its employees. As a registered entity, CTWM is subject to examinations by regulators, which may be announced or unannounced. CTWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.