

## **Wrap Fee Program Brochure**

(Part 2A Appendix 1 of Form ADV)



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This wrap fee program brochure provides information about the qualifications and business practices of Trajan Wealth, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 480-214-9835, or by email at: [jeff@trajanwealth.com](mailto:jeff@trajanwealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Trajan Wealth, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

August 8, 2017

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (480) 214-9835 or [jeff@trajanwealth.com](mailto:jeff@trajanwealth.com). The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Wrap Fee Program Brochure.

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### **Material Changes since the Last Update**

The Company had the following material changes:

- Effective August 2017, Trajan Wealth has soft dollar arrangements. Please refer to Item 9 “Additional Information: Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest” for detailed information.

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## **Item 4: Services, Fees, and Compensation**

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Trajan Wealth, LLC, ("TW") is a Registered Investment Advisor based in Scottsdale, Arizona. Founded in 2010, TW is incorporated under the laws of the State of Arizona.

TW provides personalized confidential investment advisory and portfolio management to individuals, pension and profit sharing plans, trusts, estates, corporations and charitable organizations. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

TW is a fee-based investment advisory firm registered with the Securities and Exchange Commission, and subject to its rules and regulations.

TW does not maintain physical custody of client assets.

A "wrap fee program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. TW offers some of its clients wrap accounts through third party money managers ("sub-advisers") through a managed account program, or through its own sponsored program. TW will assist clients in determining the suitability of the TW Wrap Fee Program for the client.

TW offers a clearing platform to execute securities business for investment advisory services, including Wrap Fee Program services, through TD Ameritrade Institutional and Charles Schwab & Co.

### **WRAP FEE PROGRAM**

TW's Wrap Fee Program is offered as a part of the Asset Management Service described below. The Asset Management Service is also offered by TW in a non-Wrap Fee Program.

### **ASSET MANAGEMENT SERVICE**

TW provides investment advisory services on a continuing basis, which may include the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, exchange-traded funds ("ETFs"), stocks, mutual funds, bonds, and annuities. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification.

TW provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with TW. Managed Accounts are available to individuals.

TW provides discretionary and non-discretionary investment advisory services to its clients through various managed account programs. TW will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. TW and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, reviewing the investment objectives and evaluating the investment vehicle selections
- Providing a Brochure (this document or the Form ADV Part 2A, as applicable)

#### *Sub-Advisers*

TW, in providing the services agreed upon with the client, may retain hereafter ("the sub-adviser"), an investment adviser registered under applicable securities laws, as a sub-adviser to manage all or a portion of the managed assets in the Client's account. If this occurs, TW will be responsible for the continuing supervision of the Client's account, and the actions of the sub-adviser in connection with the Client's account and the managed assets. TW also will be responsible for the payment of any advisory fee or other charges of the sub-adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. TW agrees that upon proper notice by the Client, TW will refrain from the appointment of, or terminate as permitted under applicable contracts, any sub-adviser appointed pursuant to this authority.

For the Asset Management Service, there is a \$10,000 portfolio minimum.

#### FEES

Advisory fees are paid by the client in arrears on a quarterly basis. Fees for advisory accounts are charged to the client's advisory account. Fees are debited from the client's account from TD Ameritrade Institutional or Charles Schwab & Co. on the payment due date. Fees are negotiable at the discretion of the IAR generally, which may result in different fees being charged for accounts similar in makeup and objectives. Consideration may also be given to other accounts related to, or affiliated with the client, which may result in lower fees being charged for accounts similar in makeup and objectives.

The total annual advisory fees charged to the client are based on a percentage of assets under management as follows:

<b>Assets Under Management</b>	<b>Annual Advisory Fee *</b>
\$0 - \$1,000,000	1.75%
Next \$2,000,001 +	1.50%

\*The fee schedule may not be the actual fee charged, but the maximum fee charged.

\*The above fees reflect the wrap fee, which includes investment advisory services and custodial transaction costs.

The annual fee is assessed on a quarterly schedule and calculated on the client's average daily balance. For example, a client with a \$2,000,000 portfolio will be charged 1.75% annually or .4375% per quarter on the first \$1,000,000, and then 1.50% annually or .375% per quarter on the remaining \$1,000,000. With your written authorization, the custodian automatically deducts the advisory fee from your account quarterly, and distributes the above stated fee to TW. The fees may be negotiated lower than the fees stated in the above fee schedule.

If the Wrap Fee Program contains mutual funds, the client may incur additional mutual fund expense fees.

There will never be an instance where \$1,200 or more in fees is charged six or more months in advance.

Clients who wish to terminate the agreement may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

## **Item 5: Account Requirements and Types of Clients**

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Trajan Wealth offers investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Generally, for the services that TW currently offers, a minimum of \$10,000 is required to open and maintain an advisory account. At our discretion, we may waive the minimum account size. For example, we may waive the minimum if the Client appears to have significant potential for increasing assets under management. TW may also combine account values for the Client and minor children, joint accounts with a spouse, and other types of related accounts to meet the stated minimum.

## **Item 6: Portfolio Manager Selection and Evaluation**

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For Wrap Fee Program accounts which TW sponsors, TW acts as the portfolio manager. For Wrap Fee Program accounts in which a sub-adviser that may be recommended by TW acts as the portfolio manager for its Wrap Fee Program

accounts, the sub-advisor acts as the portfolio manager. There are no conflicts of interest with this arrangement.

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### **Types of Advisory Services**

TW provides investment supervisory services, also known as asset management services, and furnishes investment advice through consultations. TW provides investment advice and portfolio management services on a continuing basis, which may include the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among cash, stocks, mutual funds and bonds and/or preparing written investment strategies. TW provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with TW.

TW's approach to the asset management process focuses on helping clients achieve their financial goals. We help our clients to develop, implement, and monitor a financial plan, incorporating the financial topics agreed upon by the client and advisor through a formal risk assessment. As a client's goals and objectives change, we will work together to modify their financial plan.

An important component of managing money is that the investment vehicle must be consistent with the investment time horizon. Clients may impose restrictions on investing in certain securities or types of securities.

TW's management and methodologies may differ between the Wrap Fee Program and the non-Wrap Fee Program services. A portion of the advisory fee charged for the Wrap Fee Program services is retained by TW, while a portion of the advisory fee goes toward the payment of transaction costs.

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### **Performance-Based Fees**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

TW does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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### **Methods of Analysis and Investment Strategies**

Security analysis methods used by TW may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.



The main sources of information may include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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### **Investment Strategy and Method of Analysis Material Risks**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or other documentation as required by TW that documents the client's objectives and their desired investment strategy.

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk. Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

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### **Proxy Votes**

TW has directed the custodian to have all proxy voting ballots sent to our clients. If a client already owned separate issue equities prior to working with TW, we feel that the client has more expertise in voting for their equity holdings. The clients are additionally sent the proxy voting ballots on the mutual funds that have been recommended by our firm. TW suggests clients make an independent decision on these proxy ballots.

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## **Item 7: Client Information Provided to Portfolio Managers**

A third party money manager may provide the portfolio management services for the Wrap Fee Program accounts. As such, TW receives all information provided by the Client through a risk assessment and consultation with the Client. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

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## **Item 8: Client Contact with Portfolio Managers**

There are no restrictions placed on TW's clients' ability to contact and consult with their portfolio managers. Clients will also receive the sub-adviser's Form ADV Part 2A Disclosure Brochure, if applicable, which will have the portfolio managers' contact information.

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## **Item 9: Additional Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

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**Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

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**Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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**Broker-Dealer or Representative Registration**

TW's Investment Advisor Representatives are not registered with an unaffiliated broker-dealer.

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**Futures or Commodity Registration**

Neither TW nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Jeffrey B. Junior has a financial industry affiliated business as an insurance agent with Trajan Wealth, LLC. Not more than 25% of his time is spent on these activities. He and/or his Investment Advisor Representative(s) may receive separate yet typical compensation in the form of finder's fees for the sale of insurance products through Trajan Wealth, LLC.

Jeffrey B. Junior is the owner of Trajan Tax, LLC. Trajan Tax, LLC provides tax services to clients. Clients are not obligated to utilize the services of Trajan Tax, LLC.

Jeffrey B. Junior is also an owner of another Securities and Exchange Registered Investment Advisor, Foundations Investment Advisors, LLC ("FIA"). Clients of TW are typically not also clients of FIA and generally the same services are offered for each firm.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

TW, in providing the services agreed upon with the client, may retain hereafter ("the sub-adviser"), an investment adviser registered under applicable securities laws, as a sub-adviser to manage all or a portion of the managed assets in the Client's account. If this occurs, TW will be responsible for the continuing supervision of the Client's account, and the actions of the sub-adviser in connection with the Client's account and the managed assets. TW also will be responsible for the payment of any advisory fee or other charges of the sub-adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. TW agrees that upon proper notice by the Client, TW will refrain from the appointment of, or terminate as permitted under applicable contracts, any sub-adviser appointed pursuant to this authority.

Sub-Advisers may provide asset management services as wrap programs or non-wrap programs. If the client elects to participate in the sub-adviser's program, the client will receive a copy of the sub-adviser's Form ADV Part 2A disclosure brochure or Wrap Fee Brochure, as applicable.

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**Code of Ethics Description**

The employees of TW have committed to a Code of Ethics. The purpose of our Code of Ethics is to ensure that when employees buy or sell securities for their personal account, they do not create actual or potential conflicts with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

TW's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of TW may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

TW's Code of Ethics is based on the guiding principle that the interests of the client are our top priority. TW's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When the potential for conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code of Ethics applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

TW and its employees do not recommend to clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

TW and its employees may buy or sell securities that are also held by clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

The advisor may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of TW shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor will not block personal trades with those of clients to ensure that clients are not at a disadvantage.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

TW does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Investment Advisor Representative assigned to the account. Account reviews are performed more frequently when market conditions dictate.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Content of Client Provided Reports and Frequency**

Clients receive standard statements and confirmations from various companies serving as custodians for the clients' investment(s), i.e. investment companies, insurance companies, brokerage firms or others. The frequency of those reports depends upon the regular reporting procedures of these entities, provided by the custodian on a monthly basis. The advisor prepares quarterly investment appraisals and performance reports for clients. Additionally, clients receive specific recommendations on their portfolio on a quarterly basis. The advisor provides general comments and investment information each quarter.

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**Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

TW participates in TD Ameritrade's institutional customer program and TW may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between TW's participation in the program and the investment advice it gives to its Clients, although TW receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving TW participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TW by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TW's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TW but may not benefit its Client accounts. These products or services may assist TW in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TW manage and further develop its business enterprise. The benefits received by TW or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, TW endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TW or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the TW's choice of TD Ameritrade for custody and brokerage services.

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**Advisory Firm Payments for Client Referrals**

TW may enter into "Solicitor/Finder" relationships. These individual solicitors offer our services to the public. TW pays a referral fee to the solicitor or finder based on its advisory fee and written agreement. Clients may pay higher or lower fees when working with a solicitor. The final fee schedule will be disclosed in the client agreement. TW will charge the total fee to the client and pay the solicitor/finder their share of the total fee. Solicitor/finders will also be appropriately registered under federal and state securities laws where applicable. Client receives all related agreements and disclosures prior to or at the time of entering into an Investment Advisory Agreement.

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**Balance Sheet**

A balance sheet is not required to be provided because TW does not serve as a custodian for client funds or securities and TW does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

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

TW has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

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**Bankruptcy Petitions during the Past Ten Years**

Neither TW nor its management has had any bankruptcy petitions in the last ten years.

**Item 10: Requirements for State Registered Advisors**

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**This section is not applicable, as TW is registered with the Securities and Exchange Commission. Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (part 2B of Form ADV Part 2).**