

## **Item 1 – Cover Page**

### **Form ADV Part 2A**

**Trinity Wealth Management LLC**

**8040 Hosbrook Road Suite 220**

**Cincinnati, OH 45236**

**(513) 794-2870**

**[www.gotrinitywealth.com](http://www.gotrinitywealth.com)**

**December 31, 2019**

This Brochure, also referred to as Form ADV Part 2A, provides information about the qualifications and business practices of Trinity Wealth Management LLC (TWM). If you have any questions about the contents of this Brochure, please contact us at (513) 794-2870 or [bob@gotrinitywealth.com](mailto:bob@gotrinitywealth.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

TWM is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training as defined by the SEC. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

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

## **Item 2 – Material Changes**

Bob Wassel has purchased a 5% interest in TWM from Chris Dexter. This represents all of Chris Dexter's ownership. Brock Dexter and Bob Wassel have entered a Transition Agreement to transfer ownership from Brock Dexter to Bob Wassel over the next three years.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to State of Ohio rules (OAC 1301:6-3-15.1 (3)), we will continue to offer annually, in writing and without charge our Form ADV Part 2A and Part 2B to each of our clients. Upon written request by a client, we will deliver or mail the requested forms within 7 days receipt of the request.

Currently, our Brochure may be requested by contacting Bob Wassel, Chief Investment Officer at (513) 794-2870 or [bob@gotrinitywealth.com](mailto:bob@gotrinitywealth.com).

Additional information about TWM is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons

affiliated with TWM who are registered, or are required to be registered, as investment adviser representatives of TWM.

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## **Item 4 – Advisory Business**

### **Advisory Firm**

Trinity Wealth Management (TWM) is a fee-based Registered Investment Advisor. TWM does not provide tax preparation services, but we may assist your tax professional in completing your return. TWM is co-owned by J. Brock Dexter (Brock) and Robert J Wassel Jr (Bob). TWM began operations January 6, 2010 with Bob as sole owner. Brock joined the firm and established ownership interest in June, 2010. Chris Dexter joined the firm and established ownership interest in September, 2014 and sold his interest December 2019 to Bob.

### **Advisory Services Offered**

We manage and advise on client assets also referred to as Assets Under Management (AUM). AUM are invested assets to which we have access to the account and for which we exercise discretionary trading authority. All services are tailored to meet client specific needs. Client needs and investment restrictions are identified upon commencement of services, reviewed periodically, or as needs change. For Wealth Management clients, in most cases, we will delineate needs, restrictions and goals in the Investment Policy Statement (IPS).

As of December 31, 2019, we manage \$211,000,000 on a discretionary basis.

We offer two basic levels of service: Wealth Management and Consultative.

## **Item 5 – Fees and Compensation**

Fees paid by clients to TWM are in addition to management fees charged to shareholders by mutual funds, ETF's, and alternative investments. There are transaction fees to buy or sell equities, bonds and some mutual funds. These fees are charged by and paid to the custodian performing the transaction. Advisory Fees are either deducted from client accounts or bills are sent to the client quarterly.

### **Wealth Management**

This is our most comprehensive service, generally for clients with at least \$600,000 investable assets and a need for detailed comprehensive financial planning. We address financial planning issues unique to your situation and prepare an IPS which establishes your goals and objectives based on your risk tolerance assessment and other data you provide to us. We then assist you in implementing your financial and investment plan, to include coordinating with your estate attorney, your tax preparer and other professionals with whom you have established working relationships. Referrals to our non-affiliated professionals for legal, tax, or insurance needs are available upon request.

Once the initial process is complete, we provide on-going investment advisory and financial planning services.

### **Wealth Management Fee Schedule**

Generally, requires \$600,000 AUM to be cost effective for the client. Ranges allow for differences in number of accounts, holding requirements and other factors that contribute to complexity and allow fees to be negotiable.

Wealth Management (WM) Fee Schedule\*

| <u>Quarterly Rate</u> | <u>on AUM from</u>             | <u>Annual Fee Rate</u> |
|-----------------------|--------------------------------|------------------------|
| .2500%                | \$0 to \$1,000,000             | 1.00%                  |
| .2125%                | \$1,000,001 up to \$3 million  | 0.85%                  |
| .1875%                | \$3,000,001 up to \$5 million  | 0.75%                  |
| .1000%                | \$5,000,001 up to \$10 million | 0.40%                  |
| .0500%                | Over \$10,000,000              | 0.20%                  |

\*At the end of each quarter, we calculate the WM fee by determining total AUM and applying the rate from the above schedule. The WM fee is paid in arrears.

Note: TWM recognizes cash as an asset class, however, our policy allows us to separately negotiate rates on cash based on its use in the portfolio and the level of current interest rates.

Advisor may household Client assets with those of other family members when determining AUM and applying the above fee schedule.

### **Consultative Services**

We offer our Consultative Services to smaller portfolios, 401k and other group retirement plans, and other limited service engagements. While we don't have an investment minimum, we will begin offering this service at \$1,500 per year or 1% of assets, whichever is greater. On a case by case basis we may go below this billing level. These services will be billed quarterly based on client preference. It is expected that this service for individuals will be of limited duration and move to Wealth Management services when the client account values exceed \$600,000.

### **Consultative Services Fee Schedule**

For one-time Financial Planning and/or Investment Advisory service, we charge \$150/hour.

For on-going Financial Planning and Investment Advisory services, we charge based on the below schedule:

1% of AUM paid quarterly in arrears for individuals; or

\$1,500 annual fee paid quarterly or annually; or

0.5% of AUM paid quarterly in arrears for 401k and other group retirement plans.

These rates are negotiable based on the specific needs of the client.

Clients with established relationships with TWM prior to this filing may remain on their current fee schedule. It is the clients' responsibility to verify the accuracy of the advisor's fee calculation and deduction. Please note that the custodian will not determine whether or not the fee is properly calculated.

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of the agreement, any prepaid, unearned fee will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering the agreement.

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

TWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

TWM provides portfolio management services to individuals, corporate retirement and profit-sharing plans, and trusts. We do not enforce account minimums but do recommend portfolio minimums for Wealth Management services. (See fee structure) and have a recommended base fee for Consultative Services of \$1,500 annually.

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

Our investment strategy starts with an assessment of the clients risk profile and financial goals. Risk profiles include portfolio size, income, required investment income, estimated years to retirement, estimated years of distribution and a subjective gauge of the client's attitudes toward risk. Attitudes towards risk are considered in two general contexts: underperforming a broad equity index when that index has increased (less than 100% upside capture ratio) and the client's attitude towards a decline in portfolio value. These measurements and analysis are included in a client's Investment Policy Statement (IPS) or other appropriate documentation (asset allocation, case notes, etc.).

Next, we determine a recommended position along the efficient market frontier which is simply the ratio of equities to fixed income. We call this our top level allocation and it ranges from a highly conservative allocation of 10% equities and 90% fixed income to an aggressive allocation of 90% equities and 10% fixed income. The theory behind this approach is that with a mix of equities and fixed income you achieve a higher expected rate of return with the same risk over time than if you held all equities or all fixed income. There are no guarantees this will be the case.

We then spread the equities and fixed income dollars to various sub segments we call asset classes. For equities we break it down by company size (large, medium, small), geography (domestic, international) and whether the company is considered a growth company or a value company. Growth companies are expected to increase earnings at an increased rate over time. Value companies are expected to be either undervalued by the market (low share price) or pay dividends or both. For fixed income, we break it down by time to maturity (cash, short term, intermediate term, long term) and geography (domestic versus international).

For equities and bonds, we primarily use mutual funds and exchange traded funds (ETF's) to achieve diversification in each asset class. The theory behind diversification is that it reduces company specific risks but does not reduce market risks. Mutual funds and ETF's can lose value and reduce your portfolio value.

We also use individual stock, individual bonds, managed futures, separately managed accounts and hedging strategies when it is appropriate. This is determined on a client by client basis and is dependent on, among other factors, portfolio size and the client risk assessment. These investments can lose value and reduce your portfolio value.

There are several risks for each of the investment products we use. These are disclosed in detail in the prospectus for each. Unless otherwise noted, there are no guarantees of principal protection for any investment we recommend.

#### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of TWM or the integrity of TWM's management. TWM has no information applicable to this Item.

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

TWM, LLC has a collaboration agreement with Charles N Kuhn (Charlie). Charlie is an Investment Advisor Representative (IAR) under TWM's Registered Investment Advisor (RIA). Charlie is licensed to sell insurance in various states and has a relationship with Principal Financial Group which pays him commissions for policies sold and implemented. Charlie's commissions from Principal Financial Group are credited to Charles N Kuhn & Associates and are not shared with TWM or any owners of TWM. For client assets under management with TWM, TWM bills the clients and shares that revenue with Charlie in his role as a TWM IAR.

TWM and its owners are under no obligation to refer clients to Charlie Kuhn, Charles N Kuhn & Associates, or Principal Financial Group.

Bob Wassel is a Certified Public Accountant (CPA) with the State of Ohio and the State of Tennessee. This is not material to TWM's business and does not create any material conflicts of interest.

TWM is wholly owned by Brock Dexter and Bob Wassel.

## Item 11 – Code of Ethics

TWM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at TWM must acknowledge the terms of the Code of Ethics annually, or as amended. TWM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which TWM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which TWM, its affiliates and/or clients, directly or indirectly, have a position of interest. TWM's employees and persons associated with TWM are required to follow TWM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of TWM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for TWM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of TWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between TWM and its clients.

TWM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Bob Wassel.

It is TWM's policy that the firm will use a third party broker dealer to effect trades for clients. In most cases that will be Schwab Institutional.

## Item 12 – Brokerage Practices

TWM does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when instructed by you or TWM, as authorized in the account application. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see "*Your Brokerage and Custody Costs*"). TWM accepts no soft dollars from any source.



## How We Select Brokers/Custodians

We seek to select, recommend and use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see *“Products and services available to us from Schwab”*)

## Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, stocks, ETF's and many mutual funds) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. This commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be otherwise. In addition to commissions and asset-based fees, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *“How We Select Brokers/Custodians”*). By using another broker or dealer you may pay lower transaction costs.

## Products and Services Available to Us From Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading,

custody, reporting, and related services) many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

#### Services That Benefit You.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

#### Services That Do Not Directly Benefit You.

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

#### Services That Generally Benefit Only Us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. TWM uses all these services to varying degrees and depending on the complexity and needs of the individual client. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

TWM also subscribes to other vendors for some of these services and pays the fee from our own resources.

#### Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "*How We Select Brokers/Custodians*") and not Schwab's services that benefit only us.

#### Other Custodians

In some cases, TWM acts as advisor to 401(k) "brokerage option" accounts for clients. In these situations, we do not choose the custodian or any services provided.

Clients may engage us to manage assets which are in custody with another broker-dealer. In those cases, we manage the accounts based on the products and services available from that custodian but, unlike our relationship with Schwab, we receive no direct support or services from those custodians.

### Item 13 – Review of Accounts

The investments in each portfolio are monitored monthly. Review of accounts will be conducted at least semiannually and when TWM determines there has been a variance in value potentially requiring rebalancing, sale or additional purchase. The criteria for the variance will be reviewed annually or more frequently, if needed. Client communicated changes in their personal situation may also trigger a review.

Quarterly statements from a third party custodian will be provided to each client.

Investments will be made in accordance with the client approved Investment Policy Statement which will include allocation targets for appropriate asset classes and allowable variances in the allocation percentage before rebalancing is required.

### Item 14 – Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see *Item 12 – Brokerage Practices*). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

TWM does not compensate anyone for client referrals and does not receive or accept prizes or awards from anyone for any reason.

### **Item 15 – Custody**

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements to the periodic portfolio reports you will receive from us.

### **Item 16 – Investment Discretion**

TWM usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account, usually incorporated in the Investment Policy Statement.

When selecting securities and determining amounts, TWM observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to TWM in writing.

### **Item 17 – Voting Client Securities**

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

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about TWM's financial condition. TWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

### **Item 19 – Requirements for State-Registered Advisers**

J. Brock Dexter, CFP®, born 1955, Bachelor of Science in Civil Engineering, United States Air Force Academy. Brock has a high level of expertise in tax planning, executive compensation, and estate planning. He has comprehensive knowledge of investments and is able to apply macroeconomic principles to evaluate valuations. He earned his Series 6, 63 and Ohio Insurance license (all currently inactive). Brock is able to analyze the most complex personal financial issues and present them in clear terms with appropriate courses of action.

11/09 - Present Consultant and Senior Advisor TWM, LLC

12/03 - 10/09 Executive Vice President, Director of Financial Planning, FMG, Inc.

7/88 - 11/03 Pilot, US Airways

5/78 - 6/88 Pilot, A-10, United States Air Force

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.

Robert J Wassel Jr, MBA, CPA/PFS, born 1960, Bachelor of Business Administration, University of Georgia; Master of Business Administration, The Owen Graduate School of Management, Vanderbilt University. Bob served on active duty with the United States Navy as a Supply Corps Officer after graduation from the University of Georgia. He worked as an auditor on the staff at KPMG in Nashville, TN and then moved into corporate financial planning roles. Bob worked on the broker dealer side of the business where he earned his Series 7, 24, 63 and Ohio Life Insurance license (all currently inactive). He earned the Personal Financial Specialist (PFS) credential from the American Institute of Certified Public Accountants (AICPA).

#### Certified Public Accountant (CPA).

CPA's 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. Additionally, all 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 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.

#### Personal Financial Specialist (PFS).

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE every three years. The PFS credential is administered through the AICPA.

11/09 - Present Founder, Senior Advisor, Chief Compliance Officer, TWM, LLC

11/07 - 11/09 Chief Compliance Officer, Lead Planner, FMG, Inc.

10/03 - 10/07 Director, Wealth Management Services, The O'Dell Group, LLC.

Charles N Kuhn, III, born 1965, Bachelor of Business Administration, majored in Finance and Marketing, University of Cincinnati. Charlie specializes in solving the financial needs and challenges of physicians, dentists, and other health care professionals. He has been assisting clients in maximizing their wealth with a minimum of risk since 1990. He is generous with his time, advice, and resources as he strives to build long-term relationships with his clients. Furthermore, he believes in serving his clients on a personal basis with year-round contact and the highest level of integrity and objectivity. Charlie is an Investment Advisory Representative for TWM and shares no outside income or revenue with the firm or its owners.

He has the following licenses: Series 7, Series 6, Series 63, and Series 65; Life and Health Insurance (various jurisdictions).

4/10 - Present Investment Advisor Representative, TWM, LLC

6/00 - 3/10 The O'Dell Group, LLC *dba* OJM Group, Cincinnati, OH, Advisory Representative

1/97 - 9/13 - Princor Financial Services, Cincinnati, OH, Registered Representative

Broker/Dealer

01/03 - Present Owner, President, Charles N. Kuhn & Associates (Insurance sales); K.O. Properties, Ltd.; Kelly Drive Properties, Ltd., Cincinnati, Ohio (Investment and Rental Property Firms)

1/98 - 6/00 Northwestern Financial Network, Cincinnati, OH, Registered Representative  
Broker/Dealer.