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O'Higgins Asset Management, Inc.

6113 Laguna Dr. W

Miami Beach, Florida 33141

305-861-1883

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

CRD Firm # 107194

March 31, 2021

This Brochure provides information about the qualifications and business practices of O'Higgins Asset Management, Inc. If you have any questions about the contents of this Brochure, please contact us at (305) 861-1883 or email us at [moh@ohiggins.com](mailto:moh@ohiggins.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.

O'Higgins Asset Management, Inc. is a registered investment adviser. Registration of an Investment Adviser in and of itself does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information from which you determine to hire or retain an Adviser.

Additional information about O'Higgins Asset Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV,” which most state regulators also adopted, changing the format of disclosure document that we provide to clients. This Brochure dated March 31, 2021 is the disclosure document prepared according to the updated requirements.

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 the disclosure requirements, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Michael B. O’Higgins at (305) 861-1883.

Additional information about O’Higgins Asset Management, Inc. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site provides information about any persons affiliated with the firm who are registered, or are required to be registered, as investment adviser representatives of O’Higgins Asset Management, Inc.

### **Material Changes**

O’Higgins Asset Management Inc. was required to file for registration as an Investment Adviser with the Securities Exchange Commission (SEC) in September 2020 because we exceeded the threshold of assets under management. Upon approval of the application, the SEC takes on the oversight and compliance of our firm. However, we continue to be registered in the State of Florida where our office is and any State where client residence mandates. We are obligated to comply with not only the rules and regulations of the SEC but also States’ rules and regulations.

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#### **Item 4 – Advisory Business**

O'Higgins Asset Management Inc.'s founder and principal is Michael B. O'Higgins. Michael B. O'Higgins and his wife, Donna B. O'Higgins, are the sole owners of the firm. On April 1, 1978, Mr. O'Higgins founded his own money management firm where he has continued to provide investment management services. O'Higgins Asset Management, Inc. is a registered investment adviser incorporated in Florida. Current clients' as well as potential clients' accounts are managed almost exclusively on a discretionary basis, requiring clients to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the Investment Management Agreement and/or trading authorization forms that you sign with our firm. O'Higgins Asset Management, Inc. principally manages portfolios using a variety of disciplined, value-based, asset allocation and security selection models. The firm's portfolios are normally concentrated in fewer than twenty securities. As a rule, securities are of the liquid, blue chip variety and are typically held for at least one year. No consideration is given to the tax implications of investment decisions. The firm's policy is to maximize risk-adjusted returns in the belief that this produces the best after-tax returns. All growth oriented accounts are invested in a similar manner and are not tailored to individual client needs. Fixed income accounts are handled on a fully discretionary basis, however duration and investment quality/rating for the individual accounts are predetermined either through a client's preexisting investment policy or guidelines established when the account is opened. The firm does have client relationships that are managed on a non-discretionary basis, however this is not a current advisory option. The firm does not participate in any wrap fee programs.

Christopher M. Briggs helps support the day to day operations of the firm. Mr. Briggs is an independent contractor who provides administrative services and is compensated directly by the firm. Sean D. O'Higgins, son of Michael B. O'Higgins, is an Investment Adviser Representatives (IAR) with the firm. Sean D. O'Higgins is Insurance Licensed and may receive compensation from sales of Life or Health products but the insurance sales, policies or the Insurance Companies issuing those policies are not affiliated with O'Higgins Asset Management, Inc. The firm does not receive any compensation directly or indirectly from any insurance sales activities.

#### **Financial Planning Service**

In addition to our advisory business O'Higgins Asset Management offers financial planning services. This service is optional and is designed as a long-term ongoing planning relationship to help clients attain their financial goals. We charge a fee for financial planning services. This fee is based on the complexity of each individual case and there is no assurance that similarly situated clients will be assessed comparable fees.

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**Assets Under Management** as of December 31, 2020, we manage approximately \$186,800,000 in client assets under management. We are not currently providing our services to new clients on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

Our fee for portfolio management services is based on a percentage of your assets managed,  $\frac{1}{4}$  % per quarter for Income (predominantly bond) accounts,  $\frac{1}{4}$  % per quarter for the MOAR Strategy options. Our portfolio management fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous quarter. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client.

Clients may terminate the agreement in writing at any time. Fees will be refunded on a pro-rata basis upon request.

The firm will send out quarterly account valuations along with an advisory fee statement and will deduct our fee directly from your account through the qualified custodian holding your funds and securities. Written authorization permitting the fees to be paid directly from your account is part of the Investment Management Agreement. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. Although we will receive a duplicate copy of your account statements, we encourage you to review all statements received from the qualified custodian for accuracy. We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian, please call our main office number located on the cover page of this brochure.

Additionally, we charge a fee for financial planning services for those clients who request the service. This fee is based on the complexity of each individual case and there is no assurance that similarly situated clients will be assessed comparable fees. This service is optional.

O'Higgins Asset Management, Inc. fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to O'Higgins Asset Management, Inc. fees,

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and O'Higgins Asset Management shall not receive any portion of these commissions, fees, or costs. Additional information regarding brokers' and brokerages' commissions can be found in section 12.

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

In some circumstances the client may choose a performance based investment advisory fee. Performance based fees could create an incentive for a firm to recommend investments which may be riskier or more speculative than those recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. O'Higgins Asset Management, Inc. has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

#### **Item 7 – Types of Clients**

O'Higgins Asset Management, Inc. provides portfolio management services to individuals, high net worth individuals, corporations, corporate pension and profit-sharing plans and private investment funds. Minimum account size is One Million Dollars, although exceptions may be made under certain circumstances.

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

Portfolios are managed on a fully discretionary basis in a prudent manner with a goal of providing competitive rates of return while preserving capital. O'Higgins Asset Management, Inc. principally manages portfolios using a variety of disciplined, value-based, asset allocation and security selection models. The firm's portfolios are normally concentrated in fewer than twenty securities. As a rule, securities are of the liquid, blue chip variety and are typically held for at least one year. No consideration is given to the tax implications of investment decisions. The firm's policy is to maximize risk-adjusted returns in the belief that this produces the best after-tax returns.

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**MOAR Strategy Accounts** offer the client an asset allocation method which is invested in one or more of these four asset classes: undervalued global stocks (“Dogs of the World”), physical gold or platinum, intermediate term Treasury Notes and long term Treasury Bonds, and is rebalanced annually.

The equity allocation will use a proprietary approach known as the “Dogs of the World” (DOTW) strategy, which seeks to invest in the most undervalued liquid stock markets in the world, selected on a top down basis from a universe of more than thirty different candidates. Although the DOTW model typically identifies five candidates, fewer or more may be selected. Once a country has been selected, a bottom up approach is employed to select the investment vehicle or vehicles which are best suited to take advantage of the undervaluation. Traditional valuation criteria are used to select the securities to be purchased.

The fixed income portion of the portfolio will be invested half in U.S. Treasury Notes of intermediate (5-10 years) maturity with the other half invested in long term U.S. Treasury Bonds (20-30 years). U.S. Treasury Bond ETFs which invest in similar securities may be used when determined to be preferable to purchasing individual Notes or Bonds.

The gold or platinum allocation will normally be invested in one or more ETFs but also may take the form of direct purchase of physical gold or platinum to be stored in a secure vault by an institutional custodian.

While, normally, 25% of the portfolio is invested in each of the above-mentioned sectors, we do have the ability to increase the weighting of the equity allocation should our DOTW have one of their infrequent losing years. The portfolio would then return to equal weighting the following year.

**Dogs of the World Accounts** are invested exclusively in the "Dogs of the World" strategy as outlined in the equity portion of the MOAR Strategy accounts above.

**Fixed Income Accounts** are handled on a fully discretionary basis, however duration and investment quality/rating for the individual accounts are predetermined either through a client’s preexisting investment policy or guidelines established when the account is opened. When evaluating a fixed income security, a number of factors such as price, coupon, yield-to-maturity and duration are considered. The credit rating from a third party rating agency is considered, however fundamental and macro economic criteria are also used to maximize risk-adjusted returns.

While competitive returns and preservation of capital are the goal, it should be noted that investing in securities, whether it be a growth account or a fixed income account, involves risk of loss that clients should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer

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any guarantees or promises that your financial goals and objectives will be met. Past performance is not necessarily an indication of future performance.

Clients should understand that all investments are subject to risks and returns and principal values fluctuate based on general market conditions as well as specific security events.

## **Investment Risk**

Market Risk The price of a stock, bond or mutual fund or other security 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.

Equity Risk Equity securities are subject to risk that the prices may fall over short and extended periods of time. Stocks can be more volatile and riskier than other forms of investments, resulting in a loss of some of or your entire principal.

Stock Selection Risk The value of stocks purchased is subject to general market conditions as well as current and future individual fundamental characteristics which may cause a partial or total loss of principal.

Political and Legislative Risk Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, significantly impacting the company's operation and the value of its securities.

Diversification The investments may be subject to more rapid change in value than would be the case if a wider diversification among companies, securities and types of securities were deployed.

Foreign Securities Such investments may be subject to greater risk than U.S. securities due to currency controls and the fluctuation of currency exchange rates or other factors.

Interest Rate Risk The market value of fixed income securities is significantly affected by changes in interest rates. Generally, the longer the maturity of the security the more the value of the security will fluctuate in response to interest rate changes.

Credit Risk The value of fixed income securities generally declines if the credit rating of the issuer declines and an issuer whose credit rating has declined may be unable to make payments of principal and/or interest.

Call Risk Fixed Income Securities may be called (redeemed) at the option of the issuer at a specified price before reaching their stated maturity. This risk increases when interest rates are declining because issuers may refinance by issuing new securities at lower rates.



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Reinvestment Risk This is a risk that future proceeds from investments may have to be reinvested at a lower rate of return. This primarily relates to fixed income securities.

## **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 O’Higgins Asset Management, Inc. services and the integrity of the management. **O’Higgins Asset Management, Inc., as well as its principals, individuals working for or representing the firm have no legal or disciplinary events applicable to this item.**

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

O’Higgins Asset Management has no other financial industry activities and affiliations other than its investment advisory business.

## **Item 11 – Code of Ethics and Privacy Notice**

### **Code of Ethics**

O’Higgins Asset Management, Inc. 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, a prohibition of rumor mongering, 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 must acknowledge the terms of the Code of Ethics annually, or as amended.

In regard to participation or interest in client transactions, from time to time, principals and employees and associated persons may buy or sell securities that are recommended to their clients or securities in which their clients are invested. Please note that client accounts will have priority when it comes to the purchase and/or sale of securities over trades conducted in the accounts of associated persons. Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities (“block trading”). Please refer to the “Brokerage Practices” section

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in this Brochure for information on our block trading practices. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that your account will have priority in the purchase or sale of securities.

### **Privacy Policy**

It is O'Higgins Asset Management, Inc.'s policy to protect its clients' privacy and the personal information you have entrusted to us and will not share any information regarding your personal affairs to any third parties who do not provide services to, or on behalf of the firm, such as securities broker/dealers, in connection with our services to the client without first obtaining the client's approval. The receiving third party is prohibited from utilizing the information for any purpose other than the one for which the information was provided. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth. The firm may, among other things, disclose or report personal information in certain circumstances where it believes disclosure is required under law, to cooperate with regulators or law enforcement authorities. Under these circumstances the client's consent or approval will not be required. Our employees are required to protect the confidentiality of the information and to comply with our established policies of protecting your privacy.

O'Higgins Asset Management, Inc. clients or prospective clients may request a copy of the firm's Code of Ethics or Privacy Policy by contacting the firm. Contact information is located on the first page of this brochure.

### **Item 12 – Brokerage Practices**

Securities are bought and sold through brokers chosen on the basis of quality of execution, availability of securities sought and investment research provided. Research services provided by a broker can be either proprietary, created and provided by the broker, or third-party research. The brokerage commissions used to acquire research services are known as "soft dollars." Commissions and dealer spreads are discounted but may be higher than those available elsewhere. In selecting a broker, O'Higgins Asset Management, Inc. reviews all commissions paid to determine that the amount of the commission charged is reasonable in relation to the brokerage and research services received. In accordance with section 28(e) of the Exchange Act,

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the Adviser may pay higher commissions or commission equivalents to brokerage firms that provide it with investment and research information than to firms that do not provide such services if the Adviser determines in good faith that such commissions are reasonable in relation to the overall services. Research may be used on accounts other than just those paying for it. Also the commissions paid by a particular client may not be in proportion to the benefit that said research provides since the benefits, if any, will be spread over all client portfolios regardless of size. Additionally, the Adviser also may effect transactions with broker-dealers which pay for research services provided by third parties in accordance with section 28(e) of the Exchange Act.

O'Higgins Asset Management, Inc. recommends Fidelity Brokerage Services LLC for clearing, custody, or other brokerage services. Fidelity Brokerage Services LLC is an unaffiliated broker-dealer, members NYSE, SIPC.

O'Higgins Asset Management, Inc. may also recommend the services of American Portfolios Financial Services, Inc., who use Pershing LLC, a subsidiary of The Bank of New York Mellon Corporation as their clearing broker. American Portfolios Financial Services, Inc. is an unaffiliated SEC-registered broker-dealer and FINRA and SIPC member. American Portfolios Financial Services, Inc. offers to independent investment advisers services that include custody of securities, trade execution, clearance and settlement of transactions.

O'Higgins Asset Management, Inc. currently has no soft dollar agreement with any party to provide third party research or services.

The receipt of brokerage research provided by the broker or third-party will not result in a reduction of our own in-house research. The receipt of such research may be deemed to be the receipt of an economic benefit creating an incentive for O'Higgins Asset Management, Inc. to use a particular broker dealer, and although customary, may be deemed to create a conflict of interest between the adviser and the client. Therefore O'Higgins Asset Management, Inc. believes it is important for clients to be aware of the issue surrounding "soft dollars."

O'Higgins Asset Management, Inc. may, at its discretion, "bunch" (block trade) orders being placed for execution at the same time for two or more clients, which may include accounts and private funds for which the firm may receive a performance based fee and/or in which the firm's employees may have an ownership interest, where it believes such aggregation is appropriate and in the best interest of the clients. This practice may enable the firm to seek more favorable executions for the combined order. Each account participating in the block trade will receive the same average execution price.

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### **Item 13 – Review of Accounts**

Since all accounts in the same category (Income and MOAR Strategy) are invested similarly in a relatively small number of holdings (i.e. under 30), the holdings are, in effect, reviewed daily by Michael B. O’Higgins.

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

Individuals who refer clients may be compensated directly at rates up to 10% of the fees generated by the account referred, provided that the individuals will only be compensated if they have the correct licensing/credentials to legally receive such payment.

### **Item 15 – Custody**

Payment of our advisory fees will be accomplished by deducting our fee directly from your account through the qualified custodian holding your funds and securities. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities which will be held with a bank, broker-dealer, or other independent qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian will indicate the amount of our advisory fees deducted from your account each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fee deducted from your account. You should compare our statements with the statements from your account custodian to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact the firm at 305-861-1883.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains your investment assets. O’Higgins Asset Management, Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities which we will be happy to explain at your request.

Since we only bill advisory fees three months in advance and the client assets are held by “Qualified Custodians,” the firm is not subject to surprise audits as it relates to custody of client assets.

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## **Item 16 – Investment Discretion**

O'Higgins Asset Management, Inc. receives discretionary authority from the client at the outset of an advisory relationship to select the type of security and amount of securities to be bought or sold. Investments may be heavily concentrated in one security or sector. Discretionary authority is granted by the investment advisory agreement you sign with our firm. Additionally, a limited power of attorney is executed with the brokerage firm which has custody of the account assets, granting trading authority.

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

As a matter of firm policy and practice, O'Higgins Asset Management, Inc. 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. Clients will receive proxy materials or other solicitations directly from their broker/custodian. O'Higgins Asset Management, Inc. may provide advice to clients regarding the clients' voting of proxies.

## **Item 18 – Financial Information**

We are not required to provide financial information to our clients because we do not require the prepayment of fees for six or more months in advance or take custody of client funds or securities or have a financial condition that is reasonably likely to impair our ability to meet our commitments to you. We do not have any financial commitments that impair our ability to meet contractual and fiduciary obligations to clients, and have not been the subject of a bankruptcy proceeding.

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Appendix A

Michael B. O'Higgins  
O'Higgins Asset Management, Inc.  
6113 Laguna Dr. W  
Miami Beach, Florida 33141  
305-861-1883

**FORM ADV PART 2B**

**BROCHURE SUPPLEMENT**

March 31, 2021

**This Brochure Supplement provides information about Michael B. O'Higgins that supplements the O'Higgins Asset Management, Inc. brochure. You should have received a copy of that brochure. Please contact Michael B. O'Higgins if you did not receive the brochure or if you have any questions about the contents of this supplement.**

**Additional information about Michael B. O'Higgins is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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## Educational Background and Business Experience

### **Michael B. O'Higgins: DOB 2/21/47 CRD # 351569**

O'Higgins Asset Management Inc.'s founder and principal is Michael B. O'Higgins. Mr. O'Higgins graduated in 1970 from Siena College, Loudonville, New York, with a B.S. in Economics. He entered the investment business in August 1971 as a stockbroker trainee with Spencer Trask & Company in their Albany, New York office. He spent the next 6-1/2 years as an institutional broker with Spencer Trask & Company and later, White, Weld & Company. On April 1, 1978, Mr. O'Higgins founded his own money management firm where he has managed investment portfolios ever since.

## 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 each supervised person providing investment advice.

**No information is applicable to this Item.**

## Other Business Activities

Beyond Mr. O'Higgins' capacity as President of O'Higgins Asset Management, Inc. he is not engaged in any other business activity.

## Additional Compensation

Mr. O'Higgins does not receive any additional compensation beyond that received as a result of his capacity as President of O'Higgins Asset Management, Inc.

## Supervision

Mr. O'Higgins is President of O'Higgins Asset Management, Inc. and Chief Compliance Officer; therefore, supervision is not required.

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Sean D. O'Higgins, MBA, CFP®, CRPC®  
O'Higgins Asset Management, Inc.  
6113 Laguna Dr. W  
Miami Beach, Florida 33141  
305-861-1883

**FORM ADV PART 2B**

**BROCHURE SUPPLEMENT**

March 31, 2021

**This Brochure Supplement provides information about Sean D. O'Higgins that supplements the O'Higgins Asset Management, Inc. brochure. You should have received a copy of that brochure. Please contact Michael B. O'Higgins if you did not receive the brochure or if you have any questions about the contents of this supplement.**

**Additional information about Sean D. O'Higgins is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



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## **Educational Background and Business Experience**

**Sean D. O'Higgins: DOB 4/20/81 CRD #4712728**

Sean O'Higgins graduated from the College of the Holy Cross, Worcester, MA, in 2003 with a B.A. in Economics and Spanish. He later earned a master's degree in business administration at the University at Albany in 2015 and his CERTIFIED FINANCIAL PLANNER™ certification in 2016. After working at several Investment Firms over the course of more than a decade, most recently at Ameriprise Financial, he joined O'Higgins Asset Management, Inc. in 2018 as an investment advisor.

## **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 each supervised person providing investment advice.

**No information is applicable to this Item.**

## **Other Business Activities**

Aside from Mr. O'Higgins' capacity as an Investment Adviser Representative of O'Higgins Asset Management, Inc., he is an officer of Wheath Watchers International, Inc. Additionally, he is a licensed to sell insurance in the states of New York and Florida.

## **Additional Compensation**

Mr. O'Higgins may, from time to time, receive additional compensation in the form of insurance commissions, beyond that received as a result of his capacity as an Investment Adviser Representative of O'Higgins Asset Management, Inc.

## **Supervision**

Michael B. O'Higgins, President of O'Higgins Asset Management, Inc. and its Chief Compliance Officer, is responsible for the direct supervision of Sean O'Higgins.