

Quint Wealth Management, Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Quint Wealth Management, Inc.. If you have any questions about the contents of this brochure, please contact us at 845-345-3628 or by email at: wquint@quintii.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 Quint Wealth Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Quint Wealth Management, Inc.'s CRD number is: 168463.

10 Raymond Avenue
Poughkeepsie, New York, 12603
845-345-3628
quintii.com
wquint@quintii.com

Registration does not imply a certain level of skill or training.

Version Date: 3/26/2021

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Quint Wealth Management, Inc on 03/11/2021. Material changes relate to Quint Wealth Management, Inc's policies, practices or conflicts of interests only.

- Quint Wealth Management, Inc. updated Fees and Compensation (Item 5).
- Quint Wealth Management, Inc. updated Other Financial Industry Activities and Affiliations (Item 10).

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business.....	4
A. Description of the Advisory Firm.....	4
B. Types of Advisory Services.....	4
Portfolio Management Services.....	4
Financial Planning.....	5
Services Limited to Specific Types of Investments.....	5
C. Client Tailored Services and Client Imposed Restrictions.....	5
D. Wrap Fee Programs.....	5
E. Assets Under Management.....	5
Item 5: Fees and Compensation.....	6
A. Fee Schedule.....	6
Portfolio Management Services Fees.....	6
Financial Planning Fees.....	6
Fixed Fees.....	6
Hourly Fees.....	6
B. Payment of Fees.....	7
Payment of Portfolio Management Fees.....	7
Payment of Financial Planning Fees.....	7
C. Clients Are Responsible For Third Party Fees.....	7
D. Prepayment of Fees.....	7
E. Outside Compensation For the Sale of Securities to Clients.....	7
Item 6: Performance-Based Fees and Side-By-Side Management.....	8
Item 7: Types of Clients.....	8
Minimum Account Size.....	8
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss.....	8
A. Methods of Analysis and Investment Strategies.....	8
Methods of Analysis.....	8
Investment Strategies.....	8
B. Material Risks Involved.....	8
Methods of Analysis.....	8
Fundamental analysis.....	8
Technical analysis.....	9
Investment Strategies.....	9
C. Risks of Specific Securities Utilized.....	9

Item 9: Disciplinary Information	9
A. Criminal or Civil Actions.....	9
B. Administrative Proceedings.....	10
C. Self-regulatory Organization (SRO) Proceedings	10
Item 10: Other Financial Industry Activities and Affiliations.....	10
A. Registration as a Broker/Dealer or Broker/Dealer Representative	10
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	10
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	10
D. Selection of Other Advisers or Managers and How This Adviser is compensated for Those Selections	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
A. Code of Ethics	12
B. Recommendations Involving Material Financial Interests	12
C. Investing Personal Money in the Same Securities as Clients.....	12
D. Trading Securities At/ Around the Same Time as Clients' Securities	13
Item 12: Brokerage Practices	13
A. Factors Used to Select Custodians and/or Broker/Dealers	13
1. Research and Other Soft-Dollar Benefits	13
2. Brokerage for Client Referrals.....	14
3. Clients Directing Which Broker/Dealer/Custodian to Use.....	14
B. Aggregating (Block) Trading for Multiple Client Accounts.....	14
Item 13: Reviews of Accounts.....	14
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	14
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts	15
C. Content and Frequency of Regular Reports Provided to Clients.....	15
Item 14: Client Referrals and Other Compensation	15
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	15
B. Compensation to Non - Advisory Personnel for Client Referrals.....	15
Item 15: Custody	15
Item 16: Investment Discretion.....	16
Item 17: Voting Client Securities (Proxy Voting).....	16
Item 18: Financial Information.....	16
A. Balance Sheet.....	16
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients	16
C. Bankruptcy Petitions in Previous Ten Years	16

Item 4: Advisory Business

A. Description of the Advisory Firm

Quint Wealth Management, Inc. (hereinafter “QWM”) is a corporation organized in the State of New York. The firm was formed in July 2013, and the principal owner is Wayne R. Quint.

B. Types of Advisory Services

QWM offers the following services to advisory clients:

Portfolio Management Services

QWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. QWM creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels).

Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

QWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. QWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

QWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of QWM’s economic, investment or other financial interests. To meet its fiduciary obligations, QWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, QWM’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is QWM’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent that might have a limited supply, among its clients on a fair and equitable basis over time. QWM uses Investment POD, LLC (CRD#164844) as subadvisor on certain accounts.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

QWM generally limits its investment advice to mutual funds, ETFs (including ETFs in the gold and precious metal sectors), and insurance products including annuities, but QWM primarily recommends ETFs and mutual funds to its clients. QWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

QWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. QWM does not participate in any wrap fee programs.

E. Assets Under Management

QWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$30,606,854	\$3,040,348	March 2021

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Services Fees

Total Assets Under Management	Annual Fee
Up to \$250,000	1.40%
\$250,001 to \$500,000	1.25%
\$500,001 to \$1,000,000	1.10%
\$1,000,001 to \$2,000,000	0.90%
Above \$2,000,000	Negotiable

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

QWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Financial Planning Fees

Fixed Fees

The rate for creating client financial plans is between \$350 and \$1500. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid entirely in advance, but never more than six months in advance.

Hourly Fees

The hourly fee for these services is between \$85 and \$150. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. A deposit of up to \$500 is paid in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Termination of Agreement

Clients may terminate the agreement without penalty, for full refund of QWM's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients

may terminate the Investment Advisory Contract generally with thirty days' written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly.

Payment of Financial Planning Fees

Fixed or Hourly Financial Planning fees are paid via check.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by QWM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

QWM collects its advisory fees in arrears. It collects its financial planning fees in advance.

- Fixed financial planning fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.
- For hourly financial planning fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

Refunds for fees paid in advance will be returned within fourteen days to the client via check.

E. Outside Compensation For the Sale of Securities to Clients

Neither QWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

QWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

QWM generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ Pension and Profit Sharing Plans

Minimum Account Size

There is no account minimum.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

QWM's methods of analysis include fundamental analysis, technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

QWM uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Exchange Traded Funds (ETFs): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) may be negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither QWM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither QWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Wayne Richard Quint is a licensed insurance agent. Insurance products and services are offered and sold through QRM a licensed insurance agency. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Quint Wealth Management, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Quint Wealth Management, Inc. in their capacity as a licensed insurance agent.

Wayne Richard Quint is a NYS approved Insurance Continuing Education Instructor through Harrington Education Center located in Staatsburg, NY. From time to time he will teach CE classes and pre-licensing examination classes for Life, Accident and Health insurance licensure.

Wayne Richard Quint is a Financial Neutral on Collaborative Divorce Cases. He receives fees to collect, review, and analyze family financial data. He will produce scenarios for

various proposed settlement plans with “what if” hypotheticals that will project actual cash and tax impact.

Wayne Richard Quint is the owner of 20 Forbus Street LLC.

Timothy James Colson is a licensed insurance agent DBA Tri- State Legacy Group. Insurance products and services are offered and sold through QRM a licensed insurance agency. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Quint Investments and Insurance always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Quint Investments and Insurance in their capacity as a licensed insurance agent.

Daniel Goodwin is a licensed insurance agent. Insurance products and services are offered and sold through QRM a licensed insurance agency. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Quint Investments and Insurance always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Quint Investments and Insurance in their capacity as a licensed insurance agent.

Daniel Goodwin owns Medicare Resource Group, a licensed insurance agency offering Medicare advantage and Medicare supplement plans.

William Pepe is a licensed insurance agent DBA Pepe Financial Group/ A.C. Pepe Insurance Agency. Insurance products and services are offered and sold through QRM a licensed insurance agency and A.C. Pepe Insurance Agency. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Quint Investments and Insurance always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Quint Investments and Insurance in their capacity as a licensed insurance agent.

Insurance products and services are offered and sold through QWM's affiliated entity, Quint Risk Management, Inc. (QRM) a licensed insurance agency, Tr-State Legacy Group, and Pepe Financial Group/ A.C. Pepe Insurance Agency

D. Selection of Other Advisers or Managers and How This Adviser is compensated for Those Selections

QWM uses Investment POD, LLC (CRD#164844) as subadvisor on certain accounts. Clients pay a single fee to QWM, rather than paying an additional fee for use of Investment POD, LLC, and thus QWM does not consider its use of the subadvisor to be a conflict of interest.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

QWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

QWM does not recommend that clients buy or sell any security in which a related person to QWM or QWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of QWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of QWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. QWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of QWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of QWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, QWM will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on QWM's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a Client on terms that are the most favorable to the Client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and QWM may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of QWM. QWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. The Custodian, Schwab Institutional, a division of Charles Schwab & Co., Inc., CRD # 5393, was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. QWM will never charge a premium or commission on transactions, beyond the actual trading or custodial cost imposed by Custodian. QWM will require that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although QWM may require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. QWM is independently owned and operated and not affiliated with Schwab.

1. Research and Other Soft-Dollar Benefits

QWM receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). QWM may enter into soft-dollar arrangements within (but not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and QWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. QWM benefits by not having to produce or pay for the research, products or services, and QWM will have an incentive to recommend a broker dealer

based on receiving research or services. Clients should be aware that QWM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

QWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

QWM may permit Clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, the client will be required to acknowledge in writing that the Client's direction with respect to the use of brokers supersedes any authority granted to QWM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless QWM is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If QWM buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, QWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. QWM would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with the Adviser's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client portfolio management accounts are reviewed at least quarterly only by Wayne R. Quint, President with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Wayne R. Quint, President. There is only one level of review and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Portfolio management reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). As there will be no ongoing Financial Planning reviews, QWM's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least annually a written report that details the client's account including assets held and asset value, which report will come from the custodian. QWM does not provide additional written reports, all required reports will be sent by the custodian. Each client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

QWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to QWM clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

QWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

QWM, with client written authority, has limited custody of client's assets through direct fee deduction of QWM's fees only. If the client chooses to be billed directly by Schwab Institutional, a division of Charles Schwab & Co., Inc., CRD # 5393 or the client's chosen custodian, QWM would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

QWM provides discretionary and non-discretionary, investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, QWM generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, the price per share. Discretionary authority is executed by agreement through the custodian account application and the investment advisory contract. The client provides QWM discretionary authority via a limited power of attorney in the Investment Advisory Contract and executing limited power of attorney in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

QWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

QWM neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither QWM nor its management has any financial condition that is likely to reasonably impair QWM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

QWM has not been the subject of a bankruptcy petition in the last ten years.