

Item 1 – Cover Page

Form ADV Part 2A Brochure

Convergent Wealth Management, LLC

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www.convergentwm.com

November 24 2021

This brochure provides information about the qualifications and business practices of Convergent Wealth Management, LLC ["CWM" or "Convergent"]. If you have any questions about the contents of this brochure, please contact us at 636-536-1800 and/or Contact@ConvergentWM.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.

Convergent Wealth Management, LLC is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about Convergent Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated November 24, 2021, represents an amendment to the Brochure for Convergent Wealth Management, LLC.

Since the filing of the last annual update Brochure amendment dated March 17, 2021, subsequently amended June 29, 2021, we have updated our Brochure to reflect our change in regulatory jurisdiction due to growth of the firm and to clarify our fee billing practices. We have also made various other minor updates, but no other material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at 636-536-1800 or Contact@ConvergentWM.com.

Additional information about Convergent Wealth Management, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

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Item 4 – Advisory Business

A. Convergent Wealth Management, LLC ["CWM"] was founded in 2009 by John P Stobbs and Jeannie N Seabaugh. Each own 50% of the company. The firm has 2 professional employees and 3 support staff. CWM's principal office and place of business is located at 16150 Main Circle Drive, Suite 115, Chesterfield, MO 63017.

The predecessor company, Stobbs & Co CPA, had been in business since May 2002.

B. Convergent Wealth Management, LLC is and has always been a boutique firm specializing in financial planning and portfolio management for its clients.

Convergent may charge fees for financial planning, investment advice and "other" services to clients who are not compensating CWM as an AUM fee-based client. Financial planning includes tax planning, insurance planning, educational funding, cash flow budgeting, retirement planning and estate planning in conjunction with the client's legal counsel. Financial planning services may be presented verbally in a meeting and/or presented in a written format, and will analyze a client's financial situation and make appropriate recommendations for strategies and methods of implementation of those strategies. For CWM's clients who are paying an AUM fee, there is no charge for any financial planning service. Just as each client is unique, each financial plan will be tailored to each client's needs and requests with respect to complexity and depth. A simple financial planning service could take as little as an hour or two while complex planning services could range into multiple hours of time. Please see Item 5 A. for an explanation of the range of fees charged for financial planning services.

"Other" includes fees for tax compliance and reporting as well as financial plans for those who request that service but are not investing clients.

When CWM manages clients' accounts, Portfolio Management, it may use general securities (stocks & bonds, mutual funds and exchange traded funds, ETFs), government securities, private equities, options and direct private placement investments, as appropriate, for each individual investor. Utilizing some or all of these securities, the applicant will create, manage and amend the client's portfolio[s]. This service is offered to all clients who elect to retain CWM

as an AUM fee-based client. The fees charged are explained in Item 5 of this ADV 2. If a client wishes to invest directly in commodities, managed futures, currency or hedge funds, CWM will help its clients select and monitor other money managers with whom they directly invest in those items as CWM does not offer those investments directly.

C. Convergent Wealth Management, LLC tailors its advisory services to each client's needs. Each client is different, so it customizes its services by consultations to identify individual needs, hopes, goals and dreams. Then CWM analyzes the client's current investments, their risk comfort level, responsibilities and other resources then makes recommendations as to how to meet their particular goals given their unique circumstances. CWM welcomes and solicits client input regarding any restrictions on investing in specific securities or types of securities as part of its process. [Please refer to Item 16.]

D. Wrap Fee programs: Convergent Wealth Management, LLC does not participate in wrap-fee programs.

E. Assets Under Management: As of December 31, 2020, Convergent Wealth Management, LLC managed approximately \$96,114,000 on a discretionary basis and \$9,110,000 on a non-discretionary basis.

Item 5 – Fees and Compensation

A. How Convergent Wealth Management, LLC is compensated:

CWM manages client accounts (on a limited discretionary basis) for a percentage of the assets under its management. The annual negotiable fee ranges from slightly less than 1% up to 2%, depending on the size and complexity of a client's account[s]. The actual fee for any client is negotiated and agreed to percentage between CWM and the client but will never be in excess of the 2% ceiling. The following table presents CWM's current fee schedule detailing break-points for each fee level, based on each client's largest account:

<u>Lower Range</u>	<u>Upper Range</u>	<u>Annual Fee %</u>
Minimum	\$29,999	1.0%
\$30,000	\$299,999	2.0%
\$300,000	\$599,999	1.7%
\$600,000	\$999,999	1.4%
\$1,000,000 +		1.0%

The fee is prorated and charged quarterly at the end of each quarter based on the ending account. If a client cancels within a quarter, any fees owing will be assessed on a pro-rated basis. In no instance will an Investment Advisement client be charged any fees if they are a client of CWM for less than two weeks.

Fees may be charged for financial planning services, as defined in Item 4 B., which typically range from \$450 to \$4,500, depending on the complexity of a client's financial situation. An Engagement Agreement defining scope of services, estimated hours and hourly fee, or an agreed to fixed fee, will be signed by both the applicant and the client before any project will commence. Half the fee may be due in advance, the rest upon presentation of the plan which will always be well within 6 months of the engagement. If a client cancels, any prepaid fees will be refunded on a pro-rated basis.

The negotiable hourly fee is up to \$450 and is paid after the client has been served, except as noted in the preceding paragraph.

B. The specific manner in which Portfolio Management fees are charged by Convergent Wealth Management, LLC is established individually in a client's written agreement with each client. CWM will generally bill its fees on a quarterly basis. Clients will be billed shortly after the close of each calendar quarter. Clients may authorize their custodian to directly debit fees from their accounts and remit to CWM or clients may elect to be billed directly for fees. Management fees shall not be pro-rated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee.

C: Convergent Wealth Management, LLC fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may 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 the advisor's fee, and Convergent Wealth Management, LLC shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that CWM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

D. Advance Charges: The only instance where the Advisor may charge in advance would be for a written Financial Plan. In that instance, up to 1/2 of the agreed to fee may be collected in advance with the remainder due upon presentation of the Plan which will always be within 6 months of engagement. If a client cancels within 5 business days, they will be refunded 100%. If a client cancels after 5 business days and before half the plan is finished, the refund will be the unfinished percentage of work. For instance, if 50% of the total fee is prepaid and 20% of the total input and analysis is complete then a 60% refund of the prepayment would be forthcoming.

E: Commissions for securities sales: No employee of Convergent Wealth Management, LLC accepts commissions or any other form of compensation for selling securities to its clients. John Stobbs is licensed to sell insurance products, earning commissions, and assigns said commissions to CWM. CWM also provides tax compliance services on a negotiated fee basis which are payable to CWM.

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

Convergent Wealth Management, LLC 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

Convergent Wealth Management, LLC may provide portfolio management services to individuals, high net worth individuals, businesses, non-profits and small corporate pension and profit-sharing plans.

We require no minimum account size for new engagements but reserve the right to accept or decline any engagement.

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

Convergent Wealth Management, LLC performs technical economic analysis, on a macro basis, to determine how economic, governmental policy, social and other influences [e.g., natural disasters] will impact financial markets. To implement this strategy, we use both fundamental and technical analysis to screen various investment choices for use in client portfolios. CWM also performs fundamental security analysis upon those individual businesses that it recommends as investments. This involves analyzing that investment's financial statements, the financial health of the institution, its management and competitive advantages, and its competitors and markets. When creating portfolios, we will allocate portfolio assets among various investments taking into consideration the overall management style selected by the client. Clients should be aware that investing in securities involves risk of loss and that they should be prepared to bear that risk. These risks include, market risk, interest rate risk, currency risk, liquidity risk and political risk, among others. We have each client complete a risk assessment and discuss the results with them to ensure communication and understanding. No investment or investment strategy can assure a profit or guarantee no loss.

CWM studies and utilizes Financial Advisor Publications, Investment News, Morningstar, and a variety of general-purpose periodicals, various educational materials received from service and product vendors as well as continuing professional education courses, to remain well versed in the markets and general news. In addition, CWM subscribes to a research services, such as: Morningstar Research and Chaikin Analytics, The American Institute of Certified Public Accountants, TD Ameritrade, Schwab and various other institutions also provide frequent webcasts that keep CWM abreast of current market, tax, investing, estate planning and other relevant trends. Convergent Wealth Management also refers to corporate rating services such as "Standard & Poors", Moody's, Fitch and others.

A: Investing in securities involves risk of loss that clients should be prepared to bear.

B. Material risks involved in our analysis or strategies: Convergent Wealth Management believes its investment strategies are fairly conservative. CWM doesn't believe they involve significant or unusual risks. For example, we do not engage in over-frequent trading of securities as that can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

C: CWM's approach to long term investing is that with a time horizon of more than 5 years. Clients should not place assets in inappropriate time horizons or illiquidity/over-liquidity positions. A key component includes the ability to weather normal life events which requires they have sufficient liquidity [usually 3-6 months living expenses] to not draw down long term investments for short term needs. Clients need to recognize that there is a possibility that their total portfolio may be worth less or more at any given point than it was in the past. They need to understand that this is a normal condition of investing.

Item 9 – Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Convergent Wealth Management, LLC or the integrity of CWM's management.

A: Criminal or civil actions: There are none to disclose.

B: Administrative proceedings before the SEC or any other government agency: There are none to disclose.

C: Any self-regulatory organization (SRO) proceeding: There are none to disclose.

Convergent Wealth Management, LLC is currently not subject to, nor has ever been subject to, any legal or disciplinary events.

Item 10 – Other Financial Industry Activities and Affiliations

A: No affiliated persons of CWM are registered with any other Financial Industry organization; but certain affiliated persons do have an independent agency relationship with certain insurance carriers.

B: Neither Convergent Wealth Management, LLC, nor anyone employed by it, is or has any intention to become a futures commission merchant, a commodity pool operator or a commodity trading advisor or an associated person involved in any of the preceding activities.

C: John Stobbs is engaged in professions in addition to providing financial planning and investment advice. He holds a CPA license. He assigns his CPA income directly to Convergent Wealth Management, LLC. John Stobbs offers insurance products earning commissions. John assigns all insurance commissions directly to CWM. He is an adjunct professor in financial planning and CPA continuing education.

John Stobbs is licensed to sell, earn commissions on insurance products. Clients should be aware that a potential conflict may exist between the interests of the client and the interests of the applicant; and the client is under no obligation to act upon the recommendations of the applicant; and if the client elects to act upon any of the recommendations the client is under no obligation to affect the insurance transactions through the applicant.

D: Prospective clients should be aware that the applicant earns a fee from its advisory business and should it recommend the client to move funds from another entity there could be a conflict of interest by virtue of that fact.

While these affiliated individuals endeavor at all times to put the interest of their clients first, as part of CWM's fiduciary duty, clients should be aware that the receipt of compensation creates a potential conflict of interest and may affect the judgment of these individuals when making recommendations. However, our clients are under no obligation to purchase products or services recommended by our associated persons or to purchase products through our associated persons. We believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

E. John Stobbs belongs to the Personal Financial Specialist Division of the American Institute of Certified Public Accountants.

These outside activities occupy relatively little of each affiliate's time.

Item 11 – Code of Ethics

A. Convergent Wealth Management, LLC has adopted a Code of Ethics for all 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 adherence to all applicable securities laws, 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 persons at CWM must acknowledge the terms of this Code of Ethics annually, and upon amendment. Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty & trust.

B. Convergent Wealth Management, LLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which CWM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which CWM, its personnel, affiliates and/or clients, directly or indirectly, have a position of interest. CWM's employees and persons associated with it are required to follow CWM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Convergent and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for its clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of CWM 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. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of its clients. In addition, the Code requires pre-clearance of certain transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics, in some circumstances, permits 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 CWM and its clients. On occasion, principals or employees of Convergent may buy or sell securities that CWM recommends to clients. There is no conflict of interest as the securities are widely held, publicly traded, and the aggregate trades by affiliated parties are too small to affect the market.

C. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with its obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. CWM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

D. Our only financial affiliations are certain insurance carriers, as disclosed in Item 10. A and C, preceding.

E. Clients, prospective clients and/or any interested party may request a copy of Convergent's Code of Ethics by contacting Convergent Wealth Management, LLC at 636-536-1800 or Contact@ConvergentWM.com.

F. It is Convergent Wealth Management's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Convergent will also not cross trades between client accounts.

Item 12 – Brokerage Practices

We require all client assets be maintained in an account at a non-affiliated 'qualified custodian'. The qualified custodians we generally recommend are TD Ameritrade or Charles Schwab. For certain accounts we have recommended Community National Bank. We have selected them based on:

Technology: Excellent recordkeeping and on-line access with timely, accurate reporting.

Skill: Well trained, client service individuals execute complex account transactions with relatively few problems.

Reputation: Highly regarded by other RIAs and individual investors alike.

Dependability: Their systems and resources provide assurance upon which one may rely.

Compatibility: A custodian who deals with independent RIAs, with investors who invest directly for themselves, and with the investing public through its own advisors.

Cost: Being among the most cost effective and best value for services available.

While we recommend that clients use the aforementioned custodians, our clients ultimately decide whether or not to do so. Clients will open an account by entering into an account agreement directly with the custodian. Although we do not open accounts for clients, we will assist them in doing so.

Our clients receive various services directly from our custodians. The custodians may charge a separate fee for custody services and may also be compensated by charging commissions or other fees on trades that they execute within a client's account. We have determined having our custodians execute trades is consistent with our duty to seek 'best execution' of our clients'

trades. Best execution means seeking the most favorable terms for a transaction based upon all relevant factors, including those stated above.

Soft dollar benefits are indirect compensation [research, products or services] Convergent Wealth Management, LLC may receive from a third party such as a custodian or vendor. An example would be if we placed clients with a certain custodian or transacted business through a certain vendor because they gave us free research. Convergent *does not* participate in any soft dollar activities. Our custodian does not refer clients to us in exchange for brokerage business ["Brokerage for Client Referrals"]. We don't require our advisement clients to execute transactions through a specific broker-dealer [also known as "Directed Brokerage"].

Item 13 – Review of Accounts

REVIEWS: Managed accounts are reviewed monthly, and we offer annual performance meetings with every Client. Accounts at other money managers are reviewed frequently, never less often than when we receive their statements. The calendar is the triggering factor. There are no different levels of review. Accounts at other money managers are reviewed when the applicant receives their statements - usually quarterly. Markets, in general are watched throughout every trading day to determine if market activity will have a material impact upon account balances.

On an ad hoc basis, accounts are reviewed when circumstances dictate [including, but not limited to: request by client, dramatic market moves, retirement, catastrophe] to determine appropriate action, if warranted.

REVIEWERS: John Stobbs, the firm's Chief Compliance Officer, and Jeannie Seabaugh, the firm's Chief Investment Officer, review all client accounts as a team. They do so on a portfolio analysis basis.

Convergent Wealth Management, LLC doesn't prepare regular client reports. Clients receive account statements, transaction confirmations and tax documents, required minimum distribution notifications, proxy and other communications from public companies, from their custodian[s], and other money manager[s] as agreed within the client agreements they have.

Item 14 – Client Referrals and Other Compensation

Convergent Wealth Management, LLC *does not* accept sales awards or other prizes such as trips. Convergent *does not* participate in any soft dollar activities.

Item 15 – Custody

CWM is deemed to have custody of client funds within the meaning of Rule 206(4)-2 under the Advisers Act based on our authority to deduct clients' advisory fees from client accounts. Further, the SEC has determined that an advisor has custody if they participate in helping a client move money from the client's investment account, under CWM management, directly to another of the client's accounts.

CWM clients will receive statements and confirmations directly from the custodian. We encourage our clients to compare information on these statements with those communications between themselves and CWM, and to let us know of any discrepancies immediately.

Rule 206(4)-2(b)(3) provides an exception to the surprise examination requirement for advisors that have custody solely for the previously cited custodial relationships. Since these are the only conditions that results in our having custody, we qualify under this exception.

Item 16 – Investment Discretion

Convergent Wealth Management, LLC usually is granted limited 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 investment objectives for the particular client account.

When selecting securities and determining amounts, CWM observes the investment philosophy, limitations and restrictions of the clients for whom it advises. For registered investment companies, Convergent's authority to trade securities may also be limited by certain federal

securities and tax laws that require diversification of investments and favor the holding of investments once made.

When a client authorizes CWM to use discretion in their account[s], the client may impose any limitations they wish. Any client investment guidelines and restrictions must be provided to Convergent in writing and may be changed by the client at any time.

Clients must execute a limited power of attorney authorization, which the client's custodian provides, in order that they may have a discretionary account managed by CWM. The custodian ensures that the client's executed power of attorney, allows Convergent to perform certain, defined and limited, actions on the client's behalf. This includes CWM receiving duplicate confirmations and account statements. If the client so elects, a second client approval, gives the custodian the direction to deduct and remit CWM's fees directly from the client's accounts.

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

Registered Investment Advisors are required in this item to provide the reader with certain financial information or disclosures about its financial condition. Convergent Wealth Management, LLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has never been the subject of a bankruptcy proceeding. Its capital is maintained in excess of the amount required by any regulatory agency which has jurisdiction over it.