



Part 2A of Form ADV: Firm Brochure

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This Brochure provides information about the qualifications and business practices of MWA Asset Management. Any reference to MWA Asset Management from this point forward will be referred to as MWA. If you have any questions about the content of this brochure, please call us at 781 263 1600. 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 MWA is available on the SEC's website at www.adviserinfo.sec.gov. One's status as a "registered investment adviser" does not imply a certain level of skill or training.

Item 2 - Material Changes

As of October 1st 2023, through a DBA filing, Morton Wealth Advisors will be doing business as MWA Asset Management. All other aspects of our business, including our business structure, ownership and legal structure remain the same.

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Item 4 – Advisory Business

MWA Asset Management (“MWA”) provides advisory services, management of client assets and financial planning. MWA started in 2006 and is owned by Randall Tavilla and Michael Capobianco.

MWA manages client assets on a case by case basis and provides customized asset management based on client needs. From there each portfolio is diversified among assets classes depending on each client’s objectives and circumstances. Clients may impose restriction on investing in certain types of securities.

Services offered by MWA include:

- Asset allocation strategies
- Formulation of investment guidelines and objectives
- Review of existing portfolio
- Implementation of portfolio recommendations
- Income and cash flow projection
- Asset Management Services

Asset management accounts are managed on a discretionary and non-discretionary basis. As of March 29, 2023, MWA manages \$184,570,753 on a discretionary basis.

Item 5 – Fees and Compensation

MWA provides investment advisory services for a percentage of the assets managed or advised on. Management fees typically start at 1.5% of assets under management, however the fee may be higher or lower based upon the amount of the assets and the scope of the management services provided. All clients are informed of fee arrangement prior to signing any agreement. At the beginning of each quarter MWA charges a fee for the upcoming quarter. If a client terminates his or her agreement with MWA prior to the end of a quarter, a pro rata portion of the management fee will be refunded. We normally deduct our fees from client accounts.

Clients may pay a broker-dealer transaction fee or commission for buying or selling securities. See Item 12 below. These commissions, mark-ups and mark-downs will be paid directly from your account to the broker-dealer who completes the purchase or sale. Purchase and sale of ETFs and certain mutual funds may also involve a broker's fee. In addition, mutual funds charge management fees, fund expenses, and possibly a distribution fee in their net price. Such expenses and fees are described in their prospectuses.

Certain clients of MWA may enter into investment management agreements with a third-party investment adviser to manage a portion of his/her/its assets. The fees charged by MWA to such clients and the fees charged by the third-party investment adviser to such clients are fully disclosed to such clients and no portion of the fee paid by the applicable clients to the third-party investment adviser inures to the benefit of MWA or its principals.

Certain clients of MWA have elected to have access to performance reporting technology offered by a third party. The \$75 annual account maintenance fee is paid by each applicable client to MWA and MWA in turn, pays the full amount of such fee to such third party on behalf of the client. No portion of such fee inures to the benefit of MWA or its principals.

Item 6 - Performance Based Fees and Side by Side Management

MWA does not charge Performance Based Fees

Item 7 - Types of Clients

MWA provides investment advice and investment management services to: Individuals, Pensions/Profit Sharing Plans, Trusts, Estates, and Charitable Organizations. The minimum account size for opening an account with us is typically \$250,000.

Item 8 - Method of Analysis, Investment Strategies, Risk of Loss

In order to determine a suitable course of action for a client, we perform a review of variables presented on a customized basis. The review may include investment objectives, income and tax status, personal and business assets, risk profile, liquidity needs and constraints and other relevant factors. After analyzing the variables and assets presented, an investment plan will be outlined to the client which can be implemented at MWA. MWA uses various internal and external research and third-party vendor products to manage assets. Examples of third-party sources used to assist in managing assets include; S&P Research, Bloomberg, Morningstar, various ETF and securities screens, news services and statistical ratings organizations, Money Tree Financial Planning Software, money.net, Moody's Research.

Investing in securities involves risk of loss that clients should be prepared to bear. This includes the risk of capital (invested amount) and any profits that have been realized. Stock and bond markets may fluctuate substantially over time, and performance of any investment is not guaranteed.

Our investment strategies may not achieve their objectives, and may not be intended to be a complete investment program.

The principal risks of our portfolios are:

- Market Risk
- Equity Securities Risk
- Fixed income risk (including issuer default risk, interest rate risk, duration risk)
- Turnover Risk

Item 9 – Disciplinary Information

There are no legal or disciplinary events that are material to our client's or prospective client's evaluation of our advisory business or the integrity of our management.

Each client of MWA can obtain the disciplinary history of the Advisor or its representatives from the SEC upon request.

Item 10 - Other Financial Industry Activities and Affiliations

Principals of MWA are licensed as insurance agents and can offer life, disability and fixed annuities. MWA can advise and manage variable annuities with a signed management agreement. All compensation received from insurance sales will be separate. We may make differing recommendations with respect to the same securities or insurance products to different advisory clients. All recommendations made are specific to each client's needs and current financial situation.

Mr. Capobianco is a minority owner in Lattanzi Financial Services, a Massachusetts registered advisory firm.

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

A client or a prospective client will be provided a copy of MWA Code of Ethics, upon request. It is the expressed policy of MWA that employees shall not have priority in any purchase or sale over client accounts. Our Code of Ethics policies seek to ensure that our personnel:

- Observe applicable legal and ethical standards in performance of their duties;
- At all times place the interest of our clients first;
- Disclose all conflicts;
- Adhere to the highest standards of loyalty, candor and care in all matters relating to our clients; and
- Not use any material non-public information in securities trading.

MWA or individuals associated with MWA may buy or sell for their personal accounts investment products identical to those recommended to clients. See Item 10 above regarding certain affiliated entities of MWA.

Item 12 - Brokerage Practices

MWA may recommend to clients that they establish accounts with certain broker dealers so that we are only dealing with a relatively small group of broker-dealers for administrative and operational purposes. In executing securities transactions for client accounts, MWA seeks to obtain best execution based on several factors, which may include execution capability, commission rates, financial stability and responsiveness. We do not receive research or other products or services other than execution from a broker dealer or a third party in connection with client securities transactions.

In most cases, MWA will trade securities on an individual account basis. When we deem the purchase and sale of securities to be in the best interest of more than one account, we may aggregate the securities to be purchased or sold, subject to our duty to seek best execution. The purchase price or sales price and related commissions will be allocated to each account on an average basis.

Item 13 –Review of Accounts

MWA reviews each client's account at least weekly for asset allocation, securities, ETF and mutual fund screening and performance. Portfolios are typically reviewed at least annually with clients. Michael Capobianco and Randall Tavilla conduct portfolio reviews. Monthly written statements come from the broker-dealer that has custody of each client account.

Item 14 - Client Referrals from Solicitors

MWA has contracted with an independent solicitor to obtain new clients. Solicitors are paid a fee by us for each referral that becomes a client. Any such contracts will be structured in compliance with all applicable rules and regulations. We will disclose to each new client, the name of the solicitor and the nature of its compensation when they enter into an agreement with MWA.

Item 15 - Custody

Client accounts and assets are held at independent broker-dealers selected by each client. These independent broker-dealers will send account statements to our clients for review on at least a quarterly basis. Clients should carefully review these account statements.

Item 16 - Investment Discretion

Pursuant to the advisory agreement entered into between MWA and each client, we have discretionary authority to manage the client's account. Client may also elect to have a nondiscretionary account or non-discretionary assets with Advisor.

Item 17 - Voting

MWA will not have proxy voting authority over client's securities. Clients receive proxy materials directly from the custodians in which their securities are maintained.

Item 18 - Financial Information

MWA is not required to provide our balance sheet to clients, we do not require prepayment of fees 6 months or more in advance. MWA has never been the subject of a bankruptcy petition. We have no financial condition that is reasonably likely to impair our ability to meet our contractual obligations to clients.

