



TRINITY WEALTH MANAGEMENT

WRAP-FEE PROGRAM BROCHURE

6710 72nd Street
Lubbock TX 79424

Brent D Dickerson, CFP[®]
806-584-8418
brent@TrinityWM.com

www.TrinityWM.com

www.BrentDickerson.com

www.NursePractitioner-FinancialPlanning.com

www.CharitableFP.com

www.Wild-Blue.us

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This wrap fee program brochure provides information about the qualifications and business practices of Trinity Wealth Management. If you have any questions about the contents of this brochure, please contact us at 806-584-8418 and/or at brent@TrinityWM.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 Trinity Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Our Firm is required to advise you of an material changes to our Wrap Fee Program Brochure (“Wrap Brochure”) since our last filing. Trinity Wealth Management has made the following changes to the Wrap Brochure:

1. We have updated our fee schedule (Service Fees and Compensation, Fees and Compensation) to include new fee structures to offer to clients. These fee structures remain fee-only (do not include commission remuneration) and are as follows:
 - Traditional Model
 - Retainer Model
 - Hourly Model
 - Income Model
2. We have added Betterment Institutional as a custodian and Sub-Advisor.
3. Portfolio Requirements
 - Updated language
4. Billing
 - Changed from “in advance” to “in arrears”

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SERVICES, FEES AND COMPENSATION

ADVISORY FIRM DESCRIPTION

Trinity Wealth Management (“TWM” or the “Firm”) has been in business since March, 2014 and approved by the State of Texas Securities Board as of June, 2014. The principal owner and founder is Brent Douglas Dickerson. TWM provides its clients with investment advisory service, which includes comprehensive wealth management services and financial planning services.

WRAP-FEE PROGRAM DESCRIPTION

The TWM Wrap-Fee Program (the “Program”) is a fee-only investment management program sponsored by TWM. The Program provides individuals, trusts, estates, and charitable organizations the ability to trade in individual debt and securities, mutual funds, exchange traded funds, index funds, and other eligible securities without incurring separate brokerage commissions or transaction charges.

TWM’s investment management service includes, but is not limited to:

- Determining Client’s investment goals
- Evaluating current assets
- Determining projected cash flow needs
- Determining any investment constraints
- Determining client risk tolerance and capacity
- Developing an asset allocation, including specific investment recommendations
- Placing trades in the client’s account as appropriate
- Ongoing support:
 - Support to the client for the investment account establishment and/or transfer assistance
 - Portfolio monitoring
- Quarterly reports

FEES AND COMPENSATION

PROGRAM FEES

Clients of TWM will have four (4) models from which to choose – the Traditional, Retainer, Hourly, and Income. Each model has its own purpose to fit the specific needs of the individual client. The client is free to choose from whichever fee model they believe fits their cash flow needs best, and are free to change fee models at any time. If a client so chooses to change their model of fee payment, the current model will stay in effect until the end of the current quarterly billing cycle is complete, and the new model will take effect from that point forward. Because of the administrative complexities of the fee model changes, clients must give at least 30 days’ notice before the end of the quarterly billing cycle. If less than 30 days’ notice is given, then the notice will be

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deemed to have been given in the following quarterly billing cycle and the changes will then take place after that billing cycle is complete.

Program assets are aggregated by family with the minimum annual fee being \$1,000 for all models, which is negotiable. For assets under management, fees will typically be deducted from the client’s account(s) under management by the custodian of client account(s). Other methods of payment can be negotiated to accommodate a client’s need to pay in a method other than stated above. Clients can choose to pay their fee by account deduction, bank draft, check, or credit/debit card transaction.

TRADITIONAL FEE MODEL

The Traditional fee model is employed by many other fee-only financial advisors and wealth managers. This model is targeted towards clients who seek the services of an asset manager more than a financial planning relationship. Financial planning services are included in this model, but investment management is the top priority. This model is a best fit for those who are established in their financial means and possibly nearing retirement. They have accumulated investable assets and need advice on creating a well-diversified portfolio of low correlated assets. They may also be nearing the de-cumulation phase of their life (i.e. retirement) and in need of a plan for dispersement. The following tables define the Traditional fee:

Regular Assets Under Management	Annual Fee
\$50,000 or Less	Minimum Annual Fee
\$50,001 – \$1,000,000	1.00%
\$1,000,001 – \$2,000,000	0.80%
\$2,000,001 – \$5,000,000	0.60%
Greater than \$5,000,000	0.40%

HONORARY DISCOUNTS

TWM honors active and retired service members of the armed forces of the USA. We also honor all first-responders, such as Firefighters, Police Officers, and Paramedics. Therefore,, if a client is a current member or veteran of any of these groups the above listed table of fees will be discounted by 25%. The following schedule of fees will pertain to memembers of these groups.

Discounted Assets Under Management	Annual Fee
\$50,000 or Less	25% Minimum Annual Fee
\$50,001 – \$1,000,000	0.75%
\$1,000,001 – \$2,000,000	0.60%
\$2,000,001 – \$5,000,000	0.45%
Greater than \$5,000,000	0.30%

INCOME BASED FEE MODEL

The Income Based fee model is one designed to provide financial advisory and wealth management services to “newly minted” and/or thriving professionals. This category of client may include, but is certainly not limited to, doctors, lawyers, dentists, professors, realtors, nurses, and nurse practitioners. These individuals may have a great deal of student loan debt, but with the potential for high salaries and earnings. It is important to these clients to exhibit wise money strategies in order to reach goals, maintain lifestyles, and protect assets from litigation or other risk of loss. Therefore, more complex strategies may exist, thus, creating the need for more time with an advisor. This often gives rise to longer hours of work and more in-depth planning processes. This fee model is a hybrid approach to paying for service. The client pays a fee based on income and net-worth. Payments are typically arranged as an upfront and monthly ongoing basis. However, these fees may be paid to fit the client’s need, but services cannot be paid more than 6 months in advance. The following table helps to define the fee model:

Client Factors	Annual Fee
Minimum Annual Fee	\$1,000.00
Client Annual Income	1.00%
Client Total Positive Net Worth (>\$0)	0.50%

Honorary Client Factors	Annual Fee
Minimum Annual Fee	\$1,000.00
Client Annual Income	0.75%
Client Total Positive Net Worth (>\$0)	0.375%

The annual income portion of the fee will be reviewed each year and determined based on the Adjusted Gross Income (AGI) of the client as reported to the Internal Revenue Service on the previous year’s tax return. This review will take place during the client’s required annual financial planning meeting. The net worth portion of the fee will be calculated based on the net worth statement derived from the client’s annual financial plan update following the required annual financial planning meeting.

RETAINER FEE MODEL

The Retainer model is designed to help young to middle-aged individuals begin a successful path towards attaining their life goals. Clients fitting this model may need help working with their cash-flows and budgeting so that they can begin to pay down debts, save for the future, and start to live a better life. This fee model works best for those in their 20s and 30s, and sometimes those older than this if in a particular situation. This fee model is simple and straight forward as it is an upfront fee plus an ongoing monthly payment of the annual fee. The fee model works with the client’s needs in order to balance the upfront cost and ongoing payments. The annual fee is, as with the other models, a minimum of \$1,000 (\$750 with the honor discount) annually. The assessed fee is determined by complexity of the planning engagement. The percentage of the fee paid upfront is customizable to the client’s need, and the remainder is then divided among 11 monthly payments. The upfront fee shall not be above 50% of the annual fee for service, and shall not be lower than 25% of the annual fee for service. The table below is used as an example of a client paying \$1,000 fee with 45% upfront and 5% monthly, thereafter. Because the annual payment for service is spread over 12 months, this plan acts as a retainer, or subscription, for service.

Total Annual Fee	\$1,000.00
45% Upfront (Month 1)	\$450.00
5% Month 2	\$ 50.00
5% Month 3	\$ 50.00
5% Month 4	\$ 50.00
5% Month 5	\$ 50.00
5% Month 6	\$ 50.00
5% Month 7	\$ 50.00
5% Month 8	\$ 50.00
5% Month 9	\$ 50.00
5% Month 10	\$ 50.00
5% Month 11	\$ 50.00
5% Month 12	\$ 50.00

HOURLY FEE MODEL

Some clients will require only a specific engagement, such as financial counseling, retirement analysis, asset allocation modeling, etc. TWM will work on an hourly basis. This limited scope of engagement is specifically for a single-time engagement. If a client desires an ongoing arrangement, then one of the previously referenced fee models must be selected. The typical hourly fee for services will range from \$100-per-hour to \$300-per-hour depending on the scope and complexity of the services needed. These fees are negotiable, but shall not be lower or higher than the range specified above. Any minimums referenced in other fee models do not apply to the hourly fee model. Furthermore, this fee model shall not be included in the Program fee models. The Hourly fee model is wholly separate from the above mentioned Program fee models.

BILLING

Fees are generally billed according to the fee model under which the client is being charged. The fees are billed in arrears, unless otherwise specified in that model definition as listed above. For example, all fees are typically billed in arrears except for the upfront fee charged on the monthly retainer model. Fees for the next fee period are calculated based on the portfolio valuation, including interest, as of the close of market on the last business day of

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the previous fee period. (i.e. monthly, quarterly, etc.) Additional deposits and withdrawals of funds and/or securities to the Program may be made to the account at any time.

TWM's Investment Advisory Agreement and the client's agreement with the account custodian will authorize the custodian to deduct the fee from the client's account. This method provides for the custodian to send the client a statement, at least quarterly, indicating all amounts disbursed from the client's account, including the amount of the fee paid directly to TWM. This fee deduction is deemed a form of custody by the Securities and Exchange Commission, although all client securities, investments and funds are held by an outside custodian. The Firm may direct the movement of funds from one account in the client's name to another account in the client's name, but has no access to funds or securities except for this deduction of fees.

TWM typically chooses to have funds deducted from client accounts; however, other methods of payment are available based on the client's preference. For example, a client may choose to pay by check, ACH, or other means that can be agreed upon by the advisor and client.

COMPREHENSIVE WEALTH MANAGEMENT FEES

Because of the differing nature of each family's needs, this service is provided on a proposal basis, where the Firm outlines to the family (or individual) what will be provided at what price. An agreement for Comprehensive Wealth Management, which will contain the proposal as an addendum, will be executed and will show exactly what services the client will receive from the Firm, any reports and regular meetings, and what fees the client will be paying. The Firm may charge a flat fee for comprehensive planning, (e.g., \$1,000) or the Firm may charge hourly for smaller projects (typically \$100 - \$300/hour). These fees and associated services are included in the client's annual Program fee (e.g. Traditional Fee Model, etc.).

FEE COMPARISON

Under the Program, clients receive both investment advisory services and the execution of transactions in eligible securities for a single, combined annualized fee, the Program Fee. Participation in the program may cost the client more or less than purchasing such services separately elsewhere. For example, the number of transactions made in the client's account, as well as the commissions charged for each transaction, will determine the relative cost of the Program versus paying for the execution on a per-transaction basis and paying a separate fee for advisory services. The Program Fee may be higher or lower than fees charged by other sponsors of comparable investment advisory programs. TWM receives the entire Program Fee, and then reimburses the broker/dealer for the transaction fees a client's account incurred, if any, during the prior quarter. Thus, TWM receives and retains the majority of the quarterly Program Fee. This fee may be higher or lower than fees available elsewhere should the client opt to pay for investment advice and transaction fees separately. TWM offers only the Program Fee to its clients in order to eliminate client concerns regarding variable transaction costs.

ADDITIONAL COSTS

The Program Fee includes transaction fees, but is separate from all other account fees including exchange, wire transfer or margin interest fees charged by the custodian.

When TWM recommends a mutual fund for a client's account, two separate fees may be charged to the client, either directly or indirectly. The first fee is TWM's investment management fee where the fund is included in the asset base for the quarterly fee calculation. The second is the set of internal fees charged by the investment company for the fund's investment management, marketing, administration and marketing assistance. These

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internal expenses are disclosed in each fund's prospectus which is provided to each client by the custodian. This set of fees also applies to any ETF or money market fund purchased in the client's account.

OTHER COMPENSATION FOR PARTICIPATION IN WRAP-FEE PROGRAM

THE CUSTODIANS AND BROKERS TWM USES.

Currently, TWM employs two Custodians and affiliated Brokers to custody and transact client investment accounts. TWM will make a determination, based on the scope, need, or other factors of the relationship to determine, at the firm's discretion, which custodian/broker is to be used for a client's account.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including, but not limited to:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.

SHAREHOLDER SERVICES GROUP (SSG)

TWM may recommend various qualified custodians for clients. TWM has an arrangement through which Shareholder Services Group (SSG) provides TWM with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. SSG's institutional platform services that assist Trinity Wealth Management in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting. SSG also offers other services intended to help Trinity Wealth Management manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Trinity Wealth Management may contract directly. Trinity Wealth Management receives these benefits as a result of its clients' relationships with SSG, but has no formal soft dollar arrangements and receives no compensation from SSG. These benefits provided by SSG might assist Trinity Wealth Management with its administration of client accounts, and thus slightly help its profitability, creating a potential conflict of interest with clients. Trinity Wealth Management believes this is not a material conflict. Trinity Wealth Management is independently operated and owned and is not affiliated with SSG. Trinity Wealth Management recommends SSG as a "qualified custodian" for clients' accounts, with each client signing a separate agreement with SSG. In recommending a custodian, Trinity Wealth Management considers the range and quality of the products the custodian offers, the technical support provided, execution quality, commission rates, the financial responsibility and responsiveness of the custodian to both Trinity Wealth Management and its clients. Trinity Wealth Management recognizes its responsibility to attain best execution and recognizes that limiting its custodial relationships may affect its ability to provide best execution on a trade-by-trade basis. However, Trinity

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Wealth Management evaluates its entire custodial relationship in assessing best execution on a client-by-client basis.

BETTERMENT INSTITUTIONAL

We may also recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker- dealer, member SIPC, as the qualified custodian depending on the need, scope, nature of the engagement, or other factors as determined at the Firm’s discretion. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment Institutional’s platform.

For our clients’ accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services, but is compensated as part of the Betterment Institutional platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above. Because Betterment does not charge commissions for transactions, but rather a fee on a percentage of asset accounts, TWM will reduce the compensation received from any AUM fee charged to clients in the Traditional fee model. The following table should help in clarifying this situation.

Total Household Account Value	TWM AUM fee	Betterment AUM fee	Total AUM fee
\$1,000,000	0.75%	0.25%	1.00%

In other words, regardless of which custodian, a client at this asset level will always pay the 1.00% annual fee.

Betterment Securities serves as broker dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like us (“Betterment Institutional”). Betterment Institutional also makes available various support services which may not be available to Betterment’s retail customers. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Betterment Institutional’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional’s support services:

- **SERVICES THAT BENEFIT YOU.** Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities’ services described in this paragraph generally benefit you and your account.
- **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment Institutional also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts, such as software and technology that may:

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- Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts. In
- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Provide pricing and other market data.
- Assist with back-office functions, recordkeeping, and client reporting.
- **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment Institutional, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
 - Educational conferences and events.
 - Consulting on technology, compliance, legal, and business needs.
 - Publications and conferences on practice management and business succession.

The availability of these services from Betterment Institutional benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment Institutional and Betterment Securities' services that benefit only us.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Betterment Securities to deduct our advisory fees directly from your account. Betterment Securities maintains actual custody of your assets. Your statements will be available for you to review on the activity section of your Betterment Institutional account portal. You will also receive account statements directly from Betterment Securities at least quarterly at www.bettermentsecurities.com. You should carefully review those statements promptly.

PORTFOLIO REQUIREMENTS AND TYPES OF CLIENTS

PORTFOLIO REQUIREMENTS

TWM prefers a minimum investment amount to start of \$50,000 in order to meet the minimum fee required; however, we understand that not all clients will meet this minimum. Therefore, TWM reserves the right to waive or lower this minimum as needed.

TYPES OF CLIENTS

TWM provides investment supervisory services and manages investment advisory accounts for:

- Individuals
- High Net Worth (HNW) Individuals
- Trusts, estates, or charitable organizations
- Corporations or other business entities

PORTFOLIO MANAGER SELECTION AND EVALUATION

TWM is not the only portfolio manager for the Program described in this wrap-fee program brochure. TWM does offer access to Betterment Institutional portfolio managers, but offers one fee to its clients in order to eliminate concerns regarding variable transaction costs. To the extent that TWM receives the Program Fee as a result of recommending itself, the Firm is in a conflict of interest with its clients.

ADDITIONAL FIRM INFORMATION

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

TWM does not receive performance-based fees on any accounts. Side-by-Side management would apply if the Firm managed both accounts paying such fees and accounts not paying performance fees.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

TWM may use a combination of the following types of analysis, or may ignore certain types of analysis, in evaluating investments or managers of funds for client accounts:

- Charting – Analysis of charts of past securities performance
- Fundamental – Analysis of financial attributes of a company, such as revenue growth, debt-to-equity ratio, inventory turnover, etc.
- Technical – Analysis which assumes past performance is a predictor of future performance.
- Cyclical – Analysis based on business, industry, calendar or historical cycles.

The investment strategies TWM uses to implement advice include, but are not limited to:

- Long-term purchases (securities held at least a year)
- Short-term purchases (securities sold within a year)

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Investment strategies for clients' accounts are structured to meet each client's objectives. Asset allocation is the major differentiation between strategies. Diversification is accomplished within and across poorly correlated asset categories by varying sectors, time horizons income production, and other factors.

TWM does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that the Firm may use, or the success of the Firm's overall management of the account. The client understands that investment decisions made for the client's account by the Firm are subject to various market, economic, political and business risks, and that those investment decisions will not always be profitable. Trading in uncovered options increases risk of loss, such that losses may exceed the amount initially invested. Clients are reminded that investing in any security entails risk of loss which they should be willing to bear.

CLIENT INFORMATION PROVIDED TO TWM

After an analysis of the information provided by the client, TWM assists the client in developing an appropriate investment strategy for the assets in his/her account (the "Investment Strategy" or "Investment Policy"). Thereafter, clients are contacted periodically and are requested to provide TWM with information regarding changes to their financial situation or investment objectives. TWM periodically reassesses the current Investment Policy based on any other information provided by the client regarding his/her client profile. TWM will share information, as required, in the process of providing portfolio management services with sub-managers, such as Betterment Institutional, with client understanding that this is necessary for proper management of assets.

The agreement that clients enter with TWM provides that the client grants TWM limited discretion (through a limited power of attorney (POA)) to determine both the securities purchased and sold and the amounts of those purchases and sales. Clients may place restrictions on TWM's discretion in writing.

CLIENT CONTACT WITH TWM

All clients are encouraged to contact or meet on at least an annual basis (semi-annually is preferred) with TWM to review their account reports, update their client information and determine whether changes should be made to their Investment Policy. There are no restrictions on clients to contact or consult with TWM regarding the Program or their account(s).

ADDITIONAL INFORMATION

DISCIPLINARY INFORMATION

There have been no disciplinary actions against TWM, Mr. Dickerson, nor any individuals associated with the Firm.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

TWM has no other financial industry activities or affiliations.

CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

TWM has adopted a Code of Ethics which describes the general standards of conduct that the Firm expects of all Firm personnel, including Mr. Dickerson, (collectively referred to as “employees”) and focuses on three specific areas where employee conducts has the potential to adversely affect the client:

1. Misuse of confidential information,
2. Personal securities trading, and
3. Outside business activities.

Failure to uphold the Code of Ethics may result in disciplinary sanctions, including termination with the Firm. Any client or prospective client may request a copy of the Firm’s Code of Ethics which will be provided at no cost.

The following basic principles guide all aspects of the Firm’s business and represent the minimum requirements to which the Firm expects employees to adhere:

- TWM and its employees have a fiduciary duty to place the interests of the client before the interests of the employee and before the firm.
- The firm must fully disclose all material facts about conflicts of which it is aware between the firm and its employees’ interests on the one hand and the clients’ interests on the other.
- Employees must work on the firm’s behalf and on their own behalf consistently with the firm’s disclosures and to manage the impacts of those conflicts.
- The firm and its employees must not take inappropriate advantage of their positions of trust with or responsibility to clients.
- The firm and its employees must always comply with all applicable securities laws.

MISUSE OF NONPUBLIC INFORMATION

The Code of Ethics contains a policy against the use of nonpublic information in conducting business for the Firm. Employees may not convey nonpublic information nor depend upon it in placing personal or client securities trades.

PERSONAL SECURITIES TRADING

Mr. Dickerson or individuals associated with the Firm may buy, sell, or hold in their personal accounts the same securities the Firm recommends to its clients. Such trades may occur simultaneously with or after trades placed in behalf of clients and receive average pricing or after trades with clients always receiving the same or better pricing.

To avoid conflicts of interest, the Firm has established the following policies:

- An officer, director, or employee of TWM shall not buy or sell securities for a personal portfolio when the decision to purchase is substantially derived, in whole or in part, by reason of employment with the Firm, unless the information is also available to the investing public on reasonable inquiry. No person associated with TWM shall prefer his or her own interest to that of any client. Employees may participate in block trades.
- Employee accounts are encouraged to be held at Shareholder Services Group (SSG) or Betterment Institutional so the Firm is able to monitor any trades that employees have placed in their personal accounts.
- Employees are required to submit reports of personal securities trades on a quarterly basis, and securities holdings annually. These are reviewed by the Chief Compliance Officer (CCO) to ensure compliance with the Firm's policies.

The firm's Code of Ethics allows the purchase of IPOs or private placements only with prior permission from Mr. Dickerson, the Firm's CCO. Clients may request to review a copy of the Firm's Code of Ethics, which contains the employee trading policy.

OUTSIDE BUSINESS ACTIVITIES

Employees are required to report any outside business activities generating revenue. If any are deemed to be in conflict with clients, such conflicts will be fully disclosed.

REVIEW OF ACCOUNTS

Mr. Dickerson conducts all account reviews. Reviews are conducted as a matter of course at least quarterly and consist of looking at portfolio holdings, cash flows, and market activity in light of client objectives and goals. Additional reviews may be triggered by events such as a client meeting, change in a client's risk tolerance or capacity, financial position or investment objective, change in company or fund managers, unusual market or economic circumstances or other unforeseen events.

The Firm or one of its custodians provides clients with quarterly written/electronic statements of portfolio holdings and annual written/electronic summaries of income and investment management fees paid. The custodian provides detailed written statements of realized gains/losses on IRS for 1099. All clients are encouraged to contact or meet on at least an annual (semi-annual preferred) basis with TWM to review their account reports, update their client information and determine whether changes should be made to their investment policy.

CLIENT REFERRALS AND OTHER COMPENSATION

TWM does not compensate any person directly or indirectly for client referrals.

FINANCIAL INFORMATION

There is no financial condition that is reasonably likely to impair TWM's ability to meet its contractual commitments to its clients.

CLIENT ASSETS UNDER MANAGEMENT

As of May 18, 2016, TWM's Program had \$20,000 of discretionary assets under management.

TERMINATION

The typical Program agreement TWM enters into with clients allows for either party to terminate the agreement immediately upon receipt of written notice. The client may terminate the agreement without penalty within five (5) business days after entering the agreement. Otherwise, at the date of termination, the client agrees to pay fees due the Firm on a pro rata basis. The Firm will provide clients of the Program services with summary statements on a year-to-date basis upon termination.

Either the client, or the Firm, may terminate the typical Investment Management or Comprehensive Wealth Management agreement TWM enters into with clients at any time upon written receipt of notice from the other party, and any fees due to the Firm or to outside parties will be paid promptly by the client. To the extent that prepaid fees have not yet been earned, those fees will be promptly refunded to the client. The Firm refunds any unused portion of the fee based on the number of days remaining in the quarter.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Neither the Firm nor any of its officers or principals has been involved in an award in an arbitration claim alleging damages, or an award of being found liable in a civil, self-regulatory organization (SRO), or administrative proceeding. Neither the Firm nor any of its officers or principals has a relationship or arrangement with an issuer of securities.