Briggs Wealth Management, Inc.

FORM ADV PART 2A – DISCLOSURE BROCHURE

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January 28, 2022

This disclosure brochure provides clients with information about the qualifications and business practices of Briggs Wealth Management, Inc., an independent investment advisory firm registered with the United States Securities and Exchange Commission ("SEC"). It also describes the services Briggs Wealth Management, Inc. provides as well as background information on those individuals who provide investment advisory services on behalf of Briggs Wealth Management, Inc. Please contact Mark V. Briggs, CFP®, President of Briggs Wealth Management, Inc. at 860-633-8988 if you have any questions about the contents of this disclosure brochure.

The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority. Registration with the SEC does not imply that Briggs Wealth Management, Inc. or any individual providing investment advisory services on behalf of Briggs Wealth Management, Inc. possess a certain level of skill or training. Additional information about Briggs Wealth Management, Inc. is available on the Internet at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Briggs Wealth Management, Inc. is 125518.

Item 2 – Material Changes

This item discusses specific material changes to the Briggs Wealth Management, Inc. disclosure brochure.

Pursuant to current SEC Rules, Briggs Wealth Management, Inc. will ensure that clients receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of the firm's fiscal year which occurs at the end of the calendar year. Briggs Wealth Management, Inc. may further provide other ongoing disclosure information about material changes as necessary. Briggs Wealth Management, Inc. will also provide clients with a new brochure as necessary based on changes or new information, at any time, without charge.

Since the date of its last annual amendment (February 9, 2021), Briggs Wealth Management, Inc. has made the following material changes to thus disclosure brochure:

Item 4 - Advisory Business

Executor Services

Briggs Wealth Management, Inc. has disclosed that it will offer executor services for settling estates.

Item 5 - Fees and Compensation

A. Advisory Fees

Portfolio Management Services Fees

Briggs Wealth Management, Inc. has updated its fee schedule for Portfolio Management Services.

Executor Services Fees

Briggs Wealth Management, Inc. has disclosed its fees for Executor Services.

Item 7 – Types of Clients

Briggs Wealth Management, Inc. has updated its minimum quarterly portfolio management fees to $2,500 and minimum annual fees to $10,000.

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Item 4 - Advisory Business

A. The Company

Briggs Wealth Management, Inc. is a privately-held Connecticut corporation that has been providing investment advisory services since 2000 and as an SEC-registered investment adviser since 2006. Throughout this disclosure brochure, Briggs Wealth Management, Inc. is referred to as the "Company".

The principal owner of the Company is Mark V. Briggs, CPA, CFP®, PFS®.

B. Advisory Services

The Company provides the following investment advisory services:

Portfolio Management Services

The Company provides personalized portfolio management services which consists of giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions, during which a client's goals and objectives are established, the Company assess the client's risk profile and investment guidelines.

The Company will then create and manage a customized portfolio based on the client's risk profile and investment guidelines. The Company will allocate the client's assets among various asset classes based on the client's risk tolerance. The Company's management of the client's account will be based on the client's investment objective (with an eye towards maximizing tax efficiency).

The Company will create a portfolio principally comprised of mutual funds, exchange traded funds (commonly known as "ETFs"), and/or debt and equity securities in accordance with the investment objectives of the client. Each portfolio will be designed with the goal of meeting each client's individual needs. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; the fund's tax efficiency; and the fund's management fee structure.

Portfolio management services will be provided on both a discretionary and non-discretionary basis. For accounts managed on a discretionary basis, the client gives the Company full authority to manage the client's assets in accordance with what the Company deems to be in the client's best interest

based on the client's investment guidelines. Securities will always remain in the name of the client.

Financial Planning Services

Financial planning is primarily an analytical process designed to organize financial data, identify needs and opportunities and evaluate alternative courses of action; it may include analysis of current net worth, income taxes, cash flow and budgeting, investments and asset allocation, retirement planning, employee benefit plan analysis, estate and gift tax planning, education pre-funding and risk management focusing on life, health and disability coverage.

In general, the Company gathers required information through personal interviews. The Company will typically meet with the client to conduct an evaluation of the client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are also reviewed. The Company conducts a financial analysis and prepares a written plan that describes the client's current situation, identifies needs and opportunities and makes suggestions designed to help the client achieve stated goals.

While financial analyses may include investment advice concerning mutual funds and securities, it may also include investment advice with respect to products that may or may not constitute "securities," such as life insurance and annuities. It also takes into consideration estate tax planning issues that may not constitute "investment" advice.

The Company may recommend its own services and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if the Company recommends its own services. The client is under no obligation to act upon any of the recommendations made by the Company under a financial planning engagement and/or engage the services of any such recommended professional, including the Company or any of its related persons. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of the Company's recommendations.

In performing its services, the Company shall not be required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information. If requested by the client, the Company may suggest the services of other professionals for implementation services, but the client is under no obligation to engage the services of any suggested professional. In addition, each client is advised that it remains their responsibility to

promptly notify the Company if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising the Company's previous recommendations and/or services.

Consulting Services

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, reviewing a client's existing portfolio, or any other specific topic. The Company also provides specific consultation and administrative services regarding investment and financial concerns of the client. Additionally, the Company provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, retirement planning and insurance.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

Executor Services

The Company provides various executor services for settling estates. As an executor, the Company may provide all or some of the following services:

1. Locate, collect and take responsibility for the estate's assets until they are distributed to the beneficiaries;
2. Obtain latest Will or Trust;
3. Obtain copy of death certificate;
4. Close out bank accounts and deposit money into an estate account;
5. Set up bank account for incoming funds to pay bills;
6. Obtain a Federal Tax ID # for estate account;
7. Hire a profession team made up of an attorney, accountant, realtor, others as needed;
8. Establish the value of Estate assets and real estate as of the date of death;
9. Maintain property until it can be sold or distributed;
10. Pay the decedent's funeral expenses, debts and estate administration expenses;

11. Manage the estate, eliminate unnecessary costs such as subscriptions, phone, internet fees, etc.;
12. Handles tax matters, including:
    a. Prepares the decedent's final income;
    b. Pays the estate's income and estate taxes;
    c. Coordinates tax planning for the estate and the beneficiaries;
13. Distributes the remaining assets in accordance with the terms of the will or trust;
14. Contact family members and beneficiaries;
15. Notify necessary organizations of the death such as creditors, banks, government agencies;
16. Pay valid debts & taxes; and
17. Submit a detailed accounting to beneficiaries and/or the probate court.

C. Client Tailored Services and Client Imposed Restrictions

The Company offers a full range of investment advisory services which can be tailored to meet the specific needs of each client. In order to provide appropriately individualized services, the Company will work with the client to obtain information regarding the client's financial circumstances, investment objectives, overall financial condition, income and tax status, personal and business assets, risk profile and other information regarding the client's financial and investment needs.

The Company will periodically review with clients their financial circumstances, investment objectives and risk profile. In order for the Company to provide effective advisory services, it is critical that clients provide accurate and complete information to the Company and inform the Company anytime such information needs to be updated or anytime there is a change in their financial circumstances, investment objectives and/or risk profile.

Generally, clients are permitted to impose reasonable restrictions on investing in certain securities or types of securities in their advisory accounts, provided, however, that some restrictions may not be accommodated when utilizing Exchange Traded Funds, mutual funds or with respect to certain third-party products or services made available through the Company. In addition, a restriction request may not be honored if it is

fundamentally inconsistent with the Company's investment philosophy, runs counter to the client's stated investment objectives, or would prevent the Company from properly servicing client accounts.

D. Wrap Fee Programs

The Company does not provide portfolio management services to a wrap fee program(s). Under a wrap fee program, advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and transaction services (*e.g.*, execution of trades) are provided for one fee. This is different than traditional investment management programs whereby services are provided for a fee, but transaction services are billed separately on a per-transaction basis.

E. Assets Under Management

As of December 31, 2021, the total amount of client assets managed by the Company is approximately $213,784,000. Of this amount, approximately $59,547,125 are managed on a non-discretionary basis and $154,237,000 are managed on a discretionary basis.

Item 5 - Fees and Compensation

A. Advisory Fees

Portfolio Management Services Fees

The annual fee for portfolio management services will be charged as a percentage of assets under management. The table below shows the maximum annual fee for portfolio management services. The actual fee charged may be less than the maximum fee shown below depending upon the size and complexity of the client's account:

Asset Under Management	Maximum Annual Fee (%)
First $1 Million	1.25%
Next $1 Million	0.75%
Over $3 Million	0.50%

The Company's annual portfolio management fee is prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable

with respect to such assets may be adjusted or prorated based on the number of days remaining in the quarter. For the initial quarter of portfolio management services, the initial fee shall be calculated on a *pro rata* basis.

Financial Planning and Consulting Services Fees

Financial planning and/or consulting services fees will be charged in one or both of two ways:

1. As a fixed fee, typically ranging from $3,000 to $5,000, depending on the nature and complexity of each client's circumstances.
2. On an hourly basis calculated on a charge of $250 per hour. The length of time it will take to complete the advisory service will depend on the nature and complexity of the individual client's personal circumstances. An estimate for total hours will be determined at the start of the advisory relationship.

Typically, fifty percent (50%) of the Financial Planning Services fee is due upon inception of the advisory relationship, with the balance payable upon completion of the financial planning service. Consulting services fees are payable monthly in arrears or upon completion of the advisory service. Typically, the financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.

Executor Services

Fees for Executor Services are charged on an hourly rate and are based on professional time and support. The Company's Executor Services fees range from $250 to $350 an hour for professional services and from $100 to $150 for support. Fees are based on complexity of the estate and are paid monthly in arrears.

In reviewing a proposed executor fee, the court may ask the Company for a task statement describing:

- size of the estate;
- responsibilities involved;
- character of the work required;
- special problems and difficulties met in doing the work;
- results achieved;
- knowledge, skill and judgment required;
- manner and promptness in which the matter was handled;
- time required; and/or

- other relevant and material circumstances.

B. Payment Method

Unless otherwise agreed to, the Company's portfolio management agreement and/or the separate agreement the client enters into with the account custodian will authorize the Company, through the account custodian, to debit the client's account for the amount of the Company's fee and to directly remit that portfolio management fee to the Company. Details of the portfolio management fee charged are more fully described in the advisory agreement entered into with each client.

In order for the Company's advisory fees to be directly debited from a client's account, the client must provide written authorization permitting the Company to bill the custodian. In addition, the account must be held by a qualified custodian and the qualified custodian must agree to send to the client an account statement on at least a quarterly basis. The account statement must indicate all amounts disbursed from the account including the amount of advisory fees paid directly to the Company. Clients are informed that it is their responsibility to verify the accuracy of the fee calculation and that the account custodian will not determine whether the fee is properly calculated.

C. Additional Fees and Expenses

Mutual Fund Fees and Exchange Traded Funds

All fees paid to the Company for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and Exchange Traded Funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay a deferred sales charge. A client could invest in a fund directly, without the services of the Company. In that case, the client would not receive the services provided by the Company which are designed, among other things, to assist the client in determining which funds are most appropriate to each client's financial condition and objectives. To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by the Company to fully understand the total amount of fees

to be paid by the client and to thereby evaluate the advisory services being provided.

Trading and Other Costs

All fees paid to the Company for investment advisory services are separate and distinct from transaction fees charged by broker-dealers associated with the purchase and sale of mutual funds, Exchange Traded Funds, fixed-income and equity securities and options. In addition, fees do not include the services of any co-fiduciaries, accountants, broker-dealers or attorneys. Please see the section entitled "Brokerage Practices" on page 17 of this disclosure brochure for additional information on brokerage and other transaction costs.

Professional Fees

Fees do not include the services of any co-fiduciaries, accountants, broker dealers or attorneys. Accordingly, the fees of any additional professionals engaged by a client, will be billed directly by such professional(s).

D. Termination and Refunds

A client agreement may be canceled by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The Company will refund fees by sending the client a check. The client has the right to terminate an agreement without penalty within five (5) business days after entering into the agreement.

E. Important Additional Information

Fees Only

The Company is compensated solely by fees paid by its clients and does not accept commissions or compensation from any other source (i.e., mutual funds, insurance products or any other investment product).

Fees Negotiable

The Company retains the right to modify fees, including minimum account sizes, in its sole and absolute discretion, on a client-by-client basis based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono*

activities, etc.). The Company may combine related household accounts for fee calculation and minimum annual fee purposes.

Fee Offset

If a financial planning and/or consulting services client engages the Company for additional investment advisory services, the Company may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

Prior Fee Schedules

The fees (including any minimum fees) charged to portfolio management clients whose assets have been managed by the Company prior to 2007 may differ from the fees charged to new advisory clients of the Company.

F. IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.

    a) Employer retirement plans generally have a more limited investment menu than IRAs.

    b) Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.

2. Your current plan may have lower fees than our fees.

    a) If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.

    b) You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.

3. Our strategy may have higher risk than the option(s) provided to you in your plan.

4. Your current plan may also offer financial advice.

5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.

6. Your 401k may offer more liability protection than a rollover IRA; each state may vary. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.

7. You may be able to take out a loan on your 401k, but not from an IRA.

8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.

9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.

10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you.

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

The Company does not accept performance-based fees or engage in side-by-side management of client accounts. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. The Company's fees are calculated as described above in Item 5 - Fees and Compensation - and are not charged on the basis of a share of the capital gains upon, or capital appreciation of, the funds in a client's account.

Item 7 - Types of Clients

The Company provides investment advisory services to individuals (including high net worth individuals), pension and profit sharing plans, trusts, estates, corporations and other types of business entities.

Engaging the Services of the Company

All clients wishing to engage the Company for investment advisory services must first complete the applicable investment advisory agreement as well as any other document or questionnaire provided by the Company. The Company may only implement its investment management recommendations after the client has arranged for and furnished the Company with all

information and authorizations regarding accounts with the appropriate broker-dealer/custodian.

The investment advisory agreement describes the services and responsibilities of the Company to the client. It also outlines the Company's fee in detail. Upon completion of the investment advisory agreement, the Company will be considered engaged by the client. In addition, clients must complete certain broker-dealer/custodial documentation. Neither the Company nor the client may assign the investment advisory agreement without the consent of the other party. Transactions that do not result in a change of actual control or management of the Company are not to be considered an assignment.

A copy of the Company's privacy policy notice and this written disclosure statement are provided to each client prior to or contemporaneously with the execution of the investment advisory agreement. Any client who has not received a copy of the Company's written disclosure statement at least forty eight (48) hours prior to executing the investment advisory agreement shall have five (5) business days subsequent to executing the agreement to terminate the Company's services without penalty.

The Company's clients are advised to promptly notify the Company if there are ever any changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon the Company's management services.

Conditions for Managing Accounts

Portfolio Management Services

The Company requires new clients have a minimum account size of $1,000,000 for portfolio management services, although the Company retains the right to reduce or waive this minimum account size. Accounts of less than $1,000,000 may be set up when the client and the Company anticipate the client will add additional funds to the accounts bringing the total to $1,000,000 within a reasonable time. Other exceptions will apply to employees of the Company and their relatives, or relatives of existing clients. Economic hardship circumstances may also be taken into consideration.

The Company also requires a minimum quarterly fee of $2,500 (which equals $10,000 on an annual basis) for portfolio management services. The Company retains the right to reduce or waive the minimum annual fee. In the event a client only pays the minimum quarterly fee of $2,500 for four consecutive

quarters, the minimum quarterly fee can be increased at the discretion of the Company by five percent (5%) per year.

Financial Planning Services

There is no minimum account size requirement for financial planning services clients. The Company does require a minimum financial planning fee of $3,000. However, clients retaining the Company for portfolio management services may have this fee offset by their portfolio management fee. There is no minimum consulting fee.

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

The Company both analyzes securities and evaluates the client's investments to ascertain that the fundamental features synchronize with the client's objectives. Commercially available services concerning investments, as well as taxation, numerous financial newspapers and periodicals are all used for securities evaluation. Outside consultants may also be employed to provide additional expertise in unique situations. The Company's advice is long term oriented. After ascertaining that the client's short term cash flow needs are met, investment strategies are designed to help the client achieve his/her goals for future financial security.

A. Methods of Analysis and Investment Strategies

Methods of Analysis

The security analysis method employed by the Company is fundamental analysis.

Fundamental Analysis

Fundamental analysis is a method of evaluating securities by attempting to measure the intrinsic value of a stock. Fundamental analysts study the overall economy and industry conditions, the financial condition of a company, details regarding the company's product line, and the experience and expertise of the company's management. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Investment Strategies

The Company will use all or some of the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizons, among other considerations:

Long-Term Purchases

Securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short-Term Purchases

Securities are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Option Writing

An investment strategy utilizing option writing involves selling (writing) an option. An option is the right, but not the obligation, to buy or sell a particular security at a specified price before the expiration date of the option. When an investor sells (writes) an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The seller pays the buyer a premium (the market price of the option at a particular time) in exchange for writing the option.

Types of Investments

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments may include domestic and foreign equity securities, exchange-traded funds (ETFs), corporate debt securities, commercial paper, certificates of deposit, municipal and United States government securities, mutual funds, variable annuities, options and real estate investment trusts (REITS).

Sources of Information

In conducting security analysis, the Company may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, annual reports, prospectuses, filings with the U.S. Securities and Exchange Commission and company press releases.

Investing Involves Risk

Investing in securities involves risk of loss that each client should be prepared to bear. The value of a client's investment may be affected by one or more of the following risks, any of which could cause a client's portfolio return, the price of the portfolio's shares or the portfolio's yield to fluctuate:

- *Market Risk*. The value of portfolio assets will fluctuate as the stock or bond market fluctuates. The value of investments may decline, sometimes rapidly and unpredictably, simply because of economic changes or other events that affect large portions of the market.
- *Management Risk*. A client's portfolio is subject to management risk because it is actively managed by the Company's investment professionals. The Company will apply its investment techniques and risk analysis in making investment decisions for a client's portfolio, but there is no guarantee that these techniques and the Company's judgment will produce the intended results.
- *Interest Rate Risk*. Changes in interest rates will affect the value of a portfolio's investments in fixed-income securities. When interest rates rise, the value of investments in fixed-income securities tend to fall and this decrease in value may not be offset by higher income from new investments. Interest rate risk is generally greater for fixed-income securities with longer maturities or durations.
- *Credit Risk*. An issuer or guarantor of a fixed-income security, or the counterparty to a derivatives or other contract, may be unable or unwilling to make timely payments of interest or principal, or to otherwise honor its obligations. The issuer or guarantor may default causing a loss of the full principal amount of a security. The degree of risk for a particular security may be reflected in its credit rating. There is the possibility that the credit rating of a fixed-income security may be downgraded after purchase, which may adversely affect the value of the security. Investments in fixed-income securities with lower ratings tend to have a higher probability that an issuer will default or fail to meet its payment obligations.
- *Allocation Risk*. The allocation of investments among different asset classes may have a significant effect on portfolio value when one of these asset classes is performing more poorly than the others. As investments will be periodically reallocated, there will be transaction costs which may be, over time, significant. In addition, there is a risk that certain asset allocation decisions may not achieve the desired results and, as a result, a client's portfolio may incur significant losses.
- *Foreign (Non-U.S.) Risk*. A portfolio's investments in securities of non-U.S. issuers may involve more risk than those of U.S. issuers. There

securities may fluctuate more widely in price and may be less liquid due to adverse market, economic, political, regulatory or other factors.

- *Emerging Markets Risk*. Securities of companies in emerging markets may be more volatile than those of companies in developed markets. By definition, markets, economies and government institutions are generally less developed in emerging market countries. Investment in securities of companies in emerging markets may entail special risks relating to the potential for social instability and the risks of expropriation, nationalization or confiscation. Investors may also face the imposition of restrictions on foreign investment or the repatriation of capital and a lack of hedging instruments.
- *Currency Risk*. Fluctuations in currency exchange rates may negatively affect the value of a portfolio's investments or reduce its returns.
- *Derivatives Risk*. Certain strategies involve the use of derivatives to create market exposure. Derivatives may be illiquid, difficult to price and leveraged so that small changes may produce disproportionate losses for a client's portfolio and may be subject to counterparty risk to a greater degree than more traditional investments. Because of their complex nature, some derivatives may not perform as intended. As a result, a portfolio may not realize the anticipated benefits from a derivative it holds or it may realize losses. Derivative transactions may create investment leverage, which may increase a portfolio's volatility and may require the portfolio to liquidate portfolio securities when it may not be advantageous to do so.
- *Capitalization Risk*. Investments in small- and mid-capitalization companies may be more volatile than investments in large-capitalization companies. Investments in small-capitalization companies may have additional risks because these companies have limited product lines, markets or financial resources.
- *Liquidity Risk*. Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing the Company from selling out of such illiquid securities at an advantageous price. Derivatives and securities involving substantial market and credit risk also tend to involve greater liquidity risk.
- *Issuer Specific Risk*. The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may comprise a variety of factors, including, but not limited to, management issues or other corporate disruption, political factors adversely affecting governmental issuers, a

decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer's competitive position.

- *Concentrated Portfolios Risk*. Certain investment strategies focus on particular asset classes, countries, regions, industries, sectors or types of investments. Concentrated portfolios are an aggressive and highly volatile approach to trading and investing. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic prices swings. In addition, the rise or drop in price of any given holding is likely to have a larger impact on portfolio performance than a more broadly diversified portfolio.
- *Legal or Legislative Risk*. Legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finances.

B. Risks Associated with Investment Strategies and Methods of Analysis

Risks Associated with Investment Strategies

Long-Term Purchases

Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or your particular investments will decrease in value even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost (e.g., "locking-up" assets that may be better utilized in the short-term in other investments).

Short-Term Purchases

Using a short-term purchase strategy generally assumes that the performance of the financial markets can be accurately predicted over the short-term. The risk associated with a short-term purchase strategy is that there are many factors that may affect market performance in the short-term including interest rate fluctuations, cyclical earnings, etc. Such factors may have a smaller impact over the longer-term. In addition, short-term trading may incur a disproportionately higher amount of transaction costs compared to long-term trading.

Risk Associated with Methods of Analysis

The analysis of securities requires subjective assessments and decision-making by experienced investment professionals, however, there is always the risk of an error in judgment.

The Company's securities analysis methods rely on the assumption that the companies whose securities the firm purchases and sells, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While the Company is alert to indications that data may be incorrect, there is always the risk that the firm's analysis may be compromised by inaccurate or misleading information.

Fundamental Analysis

Fundamental analysis, when used in isolation, has a number of risks:

- Information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- The data used may be out of date.
- It ignores the influence of random events such as oil spills, product defects being exposed, acts of God and so on.
- It assumes that there is no monopolistic power over markets.
- The market may fail to reach expectations of perceived value.

C. Risks Associated with Specific Securities Utilized

Common Stocks

The major risks associated with investing in common stocks relate to the issuer's capitalization, quality of the issuer's management, quality and cost of the issuer's services, the issuer's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk and the issuer's ability to create shareholder value (*e.g.*, increase the value of the company's stock price).

Fixed-Income Securities

Different forms of fixed-income instruments, such as bonds, money market funds, and certificates of deposit may be affected by various forms of risk, including:

- *Interest Rate Risk*. The risk that the value of the fixed-income holding will decrease because of an increase in interest rates.
- *Liquidity Risk*. The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed-income securities are generally liquid (*e.g.*, corporate bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also the risk of not being able to purchase a particular issue at the desired price.
- *Credit Risk*. The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments.
- *Reinvestment Risk*. With declining interest rates, investors may have to reinvest income or principal at a lower rate.
- *Duration Risk*. Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Municipal Bonds

In addition to the risks set forth under "Fixed-Income Securities" above, municipal bonds are susceptible to events in the municipality that issued the bond or the security posted for the bond. These events may include economic or political policy changes, changes in law, tax base erosion, state constitutional limits on tax increases, budget deficits or other financial difficulties and changes in the credit rating assigned to municipal issues.

Exchange Traded Funds

ETFs are subject to risks similar to those of stocks. Investment returns will fluctuate and are subject to market volatility, so that when shares are sold they may be worth more or less than their original cost. ETF shares are bought and sold at market price (not Net Asset Value) and are not individually redeemed from the fund. There is also the risk that a manager may deviate from the stated investment mandate or strategy of the ETF which could make the holdings less suitable for a client's portfolio. ETFs may also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. In addition, while many ETFs are known for their potential tax

efficiency and higher "qualified dividend income" (QDI) percentages, there are assets classes within these ETFs or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies that may be part of an ETF's portfolio, may be considered "non-qualified" under certain tax code provisions.

Equity Funds

The major risks associated with investing in equity mutual funds is similar to the risks associated with investing directly in equity securities, including market risk, which is the risk that investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Other risks include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification and the type and amount of sector diversification within specific industries. In addition, there is the risk that a manager may deviate from the stated investment mandate or strategy of the mutual fund which could make the holdings less suitable for a client's portfolio. Also, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold their shares in the fund. Mutual funds may also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees.

Fixed-Income Funds

In addition to the risks associated with investing in equity mutual funds, fixed-income mutual funds also the same risks as set forth under "Fixed-Income Securities" listed above.

Indexed Funds

Indexed Funds have the potential to be affected by "tracking error risk" which means a deviation from a stated benchmark index. Since the core of a portfolio may attempt to closely replicate a benchmark, the source of the tracking error (deviation) may come from a "sample index" that may not closely align the benchmark. In addition, while many index mutual funds are known for their potential tax efficiency and higher "qualified dividend income" (QDI) percentages, there are assets classes within these funds or holding periods that may not benefit. Shorter holding periods, as well as

commodities and currencies that may be part of a fund's portfolio, may be considered "non-qualified" under certain tax code provisions.

Options

There are numerous risks associated with transactions in options on securities or securities indexes. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. In the case of index options, the client incurs basis risk between the performance of the underlying portfolio and the performance of the underlying index. For example, the underlying portfolio may decline in value while the underlying index may increase in value, resulting in a loss on the call option while the underlying portfolio declines as well.

Real Estate Related Securities

Investing in real estate related securities includes, among others, the following risks: possible declines in the value of real estate; risks related to general and local economic conditions, including increases in the rate of inflation, possible lack of availability of mortgage funds, overbuilding, extending vacancies of properties, increases in competition, property taxes and operating expenses, changes in zoning laws, costs resulting from clean up of, and liability to third-parties for damages resulting from, environmental problems, casualty and condemnation losses, uninsured damages from floods, earthquakes or other natural disasters, limitations on and variations in rents and changes in interest rates. Investing in Real Estate Investment Trusts ("REITs") involves certain unique risks in addition to those risks associated with investing in real estate in general. REITs are dependent upon the skills of management, are not diversified and are subject to cash flow dependency, default by borrowers and self-liquidation.

Note that there may be other circumstances not described here that could adversely affect a client's investment and prevent their portfolio from reaching its objective.

D. Cash Management

Cash in client accounts is typically held in a Schwab money market fund although when deemed advisable, a portion of the client's cash balance may be held in a short-term bond fund. Because the Company considers the management of cash balances as an integral part of its investment management strategy, the Company includes any such cash balances when calculating it asset-based fees. To the extent that client assets are invested in

money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus.

Item 9 - Disciplinary History

The Company is required to disclose any legal or disciplinary events that are material to a client's or a prospective client's evaluation of the firm's advisory business or the integrity of the Company's management. Neither the Company nor its management personnel have ever been disciplined by a regulatory agency.

Item 10 - Other Financial Industry Activities and Affiliations

A. Broker-Dealer Registration and Registered Representatives

The Company is not registered, nor does it have an application pending to register, as a broker-dealer. No management person is registered, nor does any management person have an application pending to register, as a registered representative of a broker-dealer.

B. Futures and Commodity Registration

The Company is not registered, nor does it have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor. No management person is registered, nor does any management person have an application pending to register, as an associated person of a futures commission merchant, commodity pool operator or a commodity trading advisor.

C. Financial Industry Affiliations

The Company is a state licensed CPA firm. The Company is compensated separately for its tax/accounting services.

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

Code of Ethics

The Company has adopted a Code of Ethics to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that the Company and its employees owe a fiduciary duty to its clients. Accordingly, the Company expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws. The Company and its employees are required to adhere to the Code of Ethics. At all times, the Company and its employees must (i) place client interests ahead of the Company's; (ii) engage in personal investing that is in full compliance with the Company's Code of Ethics; and (iii) avoid taking advantage of their position. Clients and prospective clients may request a copy of the Company's Code of Ethics by contacting Mark Briggs, President of the Company, at
860-633-8988

Participation or Interest in Client Transactions

Individuals associated with the Company may buy, sell, or hold in their personal accounts the same securities that they recommend to clients.

At times, the Company or its related persons may purchase securities that it deems appropriate only for its or their own account. Based on the experience of the Company or its related persons holding the securities and on further research and due diligence, the Company may at a later time purchase such securities for client accounts at prices which might be higher or lower than those originally paid.

Item 12 - Brokerage Practices

A. Broker Selection

The Company will generally recommend that clients utilize the brokerage and clearing services of Charles Schwab & Co., Inc., a FINRA-registered broker-dealer, for investment management accounts.

Best Execution

Best execution has been defined by the SEC as the "execution of securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances." The best execution responsibility applies to the circumstances of each particular transaction and an investment adviser must consider the full range and quality of a broker-dealer's services, including, among other

things, execution capability, commission rates, the value of any research, financial responsibility and responsiveness.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while the Company will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

If the client requests the Company to arrange for the execution of securities brokerage transactions for the client's account, the Company shall direct such transactions through broker-dealers that the Company reasonably believes will provide best execution. The Company shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

Broker Analysis

The Company evaluates a wide range of criteria in seeking the most favorable price and market for the execution of transactions. These include the broker-dealer's trading costs, efficiency of execution and error resolution, financial strength and stability, capability, positioning and distribution capabilities, information in regard to the availability of securities, trading patterns, statistical or factual information, opinion pertaining to trading and prior performance in serving the Company.

Also in consideration is such broker-dealers' provision or payment of the costs of research and other investment management-related services (the provisional payment of such costs by brokers are referred to as payment made by "soft dollars", as further discussed in the "Research/Soft Dollars Benefits" section immediately below). Accordingly, if the Company determines in good faith that the amount of trading costs charged by a broker-dealer is reasonable in relation to the value of the brokerage and research or investment management-related services provided by such broker, the client may pay trading costs to such broker in an amount greater than the amount another broker might charge.

The Company's Chief Compliance Officer is responsible for continuously monitoring and evaluation the performance and execution capabilities of brokers that transact orders for our client accounts to ensure consistent quality executions. In addition, the Company periodically reviews its transaction costs in light of current market circumstances and other relevant information.

Research/Soft Dollar Benefits

The Company uses Charles Schwab & Co.'s ("Schwab"), Schwab Institutional (Schwab Institutional) service. There is no direct link between the Company's use of Schwab Institutional and the investment advice it gives to its clients, although the Company receives economic benefits through its participation in the program that are typically not available to Schwab retail investors.

As a user Schwab Institutional, Schwab makes available to the Company other products and services that benefit the Company, but may not benefit its clients' accounts. Some of these other products and services assist the Company in managing and administering clients' accounts, including:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk serving Schwab Institutional participants exclusively;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts;
- Ability to have investment advisory fees deducted directly from client account;
- Access, for a fee, to an electronic communication network for client order entry and account information;
- Receipt of compliance publications; and
- Access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors.

Schwab Institutional also makes available to the Company other services intended to help the Company manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab Institutional may make available, arrange and/or pay for these types of services rendered to the Company by independent third parties.

Additional benefits received because of the Company's use of Schwab Institutional may depend upon the number of transactions directed to, or amount of assets custodied by, Charles Schwab & Co., Inc. The Company is

required to maintain a minimum level of client assets with Schwab Institutional to avoid a quarterly service fee. While as a fiduciary the Company endeavors to act in its clients' best interests, the Company's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to the Company of the availability of some of the foregoing products and services and not solely on the nature cost or quality of custody and brokerage provided by Schwab which may create a conflict of interest.

Directed Brokerage

Company Directed Brokerage

The Company does not have the discretionary authority to determine the broker-dealer to be used. As stated above, clients in need of brokerage will have Charles Schwab & Co., Inc. Institutional Services Group ("Schwab") recommended to them. While there is no direct linkage between the investment advice given and usage of Schwab, economic benefits are received which would not be received if the Company did not give investment advice to clients (please see additional disclosures in the "Research/Soft Dollars Benefits" section directly above). The Company does not participate in any transaction fees or commissions paid to the broker dealer or custodian and does not receive any fees or commissions for the opening or maintenance of client accounts at recommended brokers.

Not all investment advisers require their clients to direct brokerage. The Company is required to disclose that by directing brokerage, the Company may not be able to achieve most favorable execution of client transactions and this practice may cost clients more money.

Client Directed Brokerage

Certain clients may direct the Company to use particular brokers for executing transactions in their accounts. With regard to client directed brokerage, the Company is required to disclose that the Company may be unable to negotiate commissions, block or batch orders or otherwise achieve the benefits described above, including best execution. Directed brokerage commission rates may be higher than the rates the Company might pay for transactions in non-directed accounts. Therefore, directing brokerage may cost clients more money. The Company reserves the right to decline acceptance of any client account that directs the use of a broker dealer if the Company believes that the broker dealer would adversely affect the Company's fiduciary duty to the client and/or ability to effectively service the client portfolio.

As a general rule, the Company encourages each client to compare the possible costs or disadvantages of directed brokerage against the value of custodial or other services provided by the broker to the client in exchange for the directed brokerage designation.

B. Trade Aggregation/Allocation

Portfolio Management

Transactions for each client generally will be made independently, unless the Company decides to purchase or sell the same securities for several clients at approximately the same time. The Company may (but is not obligated to) combine or "batch" such orders to:

- Obtain best execution;
- Negotiate more favorable commission rates; or
- Allocate equitably among the Company's clients, differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently.

Under this procedure, transactions will generally be averaged as to price and allocated among the Company's clients pro rata. In the event that the Company determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include:

- When only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates;
- Allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
- If an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed);
- With respect to sale allocations, allocations may be given to accounts low in cash;
- In cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Company

may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or

- In cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Financial Planning and Consulting

The Company's financial planning and consulting practice, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price.

C. Trade Errors

Trade errors are promptly reported to the custodian and will be rectified by the custodian with no adverse financial effect on the client. In the event that a trade error results in a gain for a client, the client will be permitted to retain any such gain in their account.

Item 13 - Review of Accounts

Portfolio Management Services

Reviews

While the underlying securities within Portfolio Management Services accounts are continuously monitored, these accounts are reviewed no less frequently than quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines, ensuring that the structure of the portfolio is coordinated with these objectives. In addition, investment returns will be measured against the appropriate benchmarks in each asset class. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

Reports

Clients will receive statements from the custodian at least quarterly. Additionally, monthly statements will be generated as a result of investment activity by the client's custodian. Confirmation statements will be issued for all trading activity. Monthly and/or quarterly statements will include

portfolio holdings, dates and amounts of transactions, cost basis and current and prior statement values.

In addition, reports issued by the custodian, the Company creates its own quarterly client reports that are either mailed directly to the client or posted on the Company's web site.

Financial Planning

Reviews

These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

Reports

Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for at the inception of the advisory relationship.

Consulting Services

Reviews

These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

Reports

Due to the nature of this service, the Company will not typically provide reports unless contracted for at the inception of the advisory relationship.

All client accounts are reviewed by the President of the Company in conjunction with the Para-Planner.

Item 14 - Client Referrals and Other Compensation

A. Economic Benefits

The Company does not receive any economic benefits (e.g., sales incentives, prizes) from non-clients for providing investment advice.

B. Client Referrals

The Company does not use solicitors to refer clients to the Company.

Item 15 - Custody

Custody of client assets will be maintained with the independent custodian selected by the client. The Company will not have physical custody of any assets in the client's account *except as permitted for payment of advisory fees*. Clients will be solely responsible for paying all fees or charges of the custodian. Clients will authorize the Company to give the custodian instructions for the purchase, sale, conversion, redemption, exchange or retention of any security, cash or cash equivalent or other investment for the client's account.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client's account during the period covered by the account statement, and the funds, securities and other property in the client's account at the end of the period. *Clients are urged to carefully review the account statement sent by the broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any statements provided by the Company*.

Item 16 - Investment Discretion

For those client accounts over which the Company has discretion, the Company requests that it be provided with written authority (e.g., limited power of attorney contained in the Company's investment management agreement) to determine the types and amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing.

The Company generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are effected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. The Company's authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between the Company and the client.

Item 17 - Voting Client Securities

Proxy Voting

The act of managing assets of clients may include the voting of proxies related to such managed assets. Where the power to vote in person or by proxy has been delegated, directly or indirectly, to the investment adviser, the investment adviser has the fiduciary responsibility for (a) voting in a manner that is in the best interests of the client and (b) properly dealing with potential conflicts of interest arising from proxy proposals being voted upon. Accordingly, the Company has instituted proxy voting policies and procedures that are designed to (i) ensure that proxies are voting in an appropriate manner and (ii) complement the Company's investment policies and procedures regarding its general responsibility to monitor the performance and/or corporate events of companies which are issuers of securities held in managed accounts.

The Company's general policy is to vote proxy proposals, amendments, consents or resolutions relating to client securities (collectively, "proxies"), in a manner that serves the best interests of the client as the Company determines in its sole discretion, taking into account the following factors: (i) the impact on the value of the securities; (ii) the costs and benefits associated with the proposal; and (iii) the customary industry and business practices. Clients may request a copy of the Company's Proxy Voting Policies by contacting Mark Briggs, President of the Company, at 860-633-8988.

Class Action Settlements

The Company, if requested by the client, will assist with class action claims. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.

Item 18 - Financial Information

A. Prepayment of Fees

Because the Company does not require or accept prepayment of more than $500 in fees six months or more in advance, the Company is not required include a balance sheet with this disclosure brochure.

B. Financial Condition

The Company does not have any adverse financial conditions to disclose.

C. Bankruptcy

The Company has never been the subject of a bankruptcy petition.

Item 19 - Additional Information

Privacy Notice

The Company views protecting its clients' private information as a top priority and has instituted policies and procedures to ensure that client information is private and secure. The Company does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties, except as permitted or required by law. In the course of servicing a client's account, the Company may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers, etc. The Company restricts internal access to nonpublic personal information about the client to those persons who need access to that information in order to provide services to the client and to perform administrative functions for the Company. As emphasized above, it has always been and will always be the Company's policy never to sell information about current or former clients or their accounts to anyone. It is also the Company's policy not to share information unless required to process a transaction, at the request of a client, or as required by law. For the full text of the Company's Privacy Policy, please contact Mark Briggs, President of the Company, at 860-633-8988.

Requests for Additional Information

Clients may contact Mark Briggs, President of the Company, at 860-633-8988 to request additional information or submit a complaint. Written complaints should be sent to Briggs Wealth Management, Inc., 59 Sycamore Street, Glastonbury, CT 06033.