



**McGuire Investment Group, LLC
D/B/A McGuire Wealth Management**

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Form ADV Part 2A Brochure
March 4, 2026

This Brochure provides information about the qualifications and business practices of McGuire Investment Group, LLC, D/B/A McGuire Wealth Management. You should review this brochure to understand your relationship with our firm and help you decide whether to hire or retain us as your investment adviser. If you have any questions about the contents of this Brochure, please contact us at (401) 364-5000. 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 our firm also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by our firm name or by using a unique identifying number, known as a CRD number. The CRD number for McGuire Investment Group is 296271. The SEC's website also provides information about any persons affiliated with MWM who are registered as investment adviser representatives of the firm.

McGuire Wealth Management is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Item 2 – Material Changes

This section of the Brochure discusses material changes made to this Brochure since the date of our last annual update in March 2025. Below is a summary of those changes:

- **Item 12 – Brokerage Practices**

Effective October 1, 2025, through March 31, 2026 (or beyond if the program is extended), TradePMR is offering an asset match program to clients of McGuire Wealth Management on new funds and investments transferred into an advisory account managed by McGuire Wealth Management on the TradePMR brokerage platform. Please refer to Item 12 of this brochure for important information related to TradePMR's asset match program.

We encourage you to carefully review this Brochure prior to entering into an investment advisory contract with our firm. If you have any questions about the contents of this Brochure, please contact us at (401) 364-5000.

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Item 4 – Advisory Business

About Our Firm

McGuire Investment Group, LLC, D/B/A McGuire Wealth Management (MWM) (CRD # 296271) has been registered as an investment adviser with the U.S. Securities and Exchange Commission since July 2018. MWM is based in Rhode Island and is organized as a limited liability company under the laws of the State of Rhode Island.

MWM's principal office and place of business is located at 105 Main Street, Wakefield, RI, 02879. Regular business hours are Monday through Friday 9:00 am to 5:00 pm. The firm can be contacted by phone at (401) 364-5000.

The firm is owned by Dennis McGuire, Jr., who is the firm's Chief Compliance Officer, and Sean McGuire.

Types of Advisory Services We Offer

MWM provides general wealth management services to individual investors including portfolio management services and financial planning services. The firm also provides retirement plan services to businesses and other institutional investors.

Advisory services are tailored to the individual needs of a particular client (whether an individual, a family, or a business) through an assessment conducted prior to an engagement. We work with our clients to determine their investment objectives and risk profile and develop a customized investment plan based on their individual needs and goals. This information is then used to develop strategies and solutions to assist the client in meeting their financial goals. Clients may impose restrictions related to the level of discretion granted, the types of investments used, etc. Terms of an actual engagement, including description of service, limitations and restrictions, fees, etc., are all detailed before any engagement begins in a written client agreement.

Investment Management and Wealth Management Services

MWM generally provides discretionary portfolio management services to individuals, families and businesses through the firm's Wrap Fee Program whereby participants in the program receive portfolio management, custodial, reporting and clearing services for one inclusive fee (see our "Form ADV Part 2A Appendix 1- Investment Management Wrap Fee Program Brochure"). In limited circumstances, MWM may also provide non-discretionary portfolio management services to clients. When providing portfolio management services, the firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting.

As part of our wealth management services, MWM provides financial planning, advice or other strategic assistance in areas such as education funding, retirement planning, estate planning, risk

management, employee benefits planning, tax planning, etc. We identify goals and objectives, collect, and analyze data, and formulate a personalized strategy.

Retirement Plan Services

MWM also provides retirement plan services to businesses which may include plan level services such as discretionary management services, non-discretionary management services, and investment advisory/consulting services related to different types of retirement plans. When providing management services, the firm is responsible for implementing recommendations. When the firm is providing advisory services, the client is responsible for implementation of recommendations.

Amount of Assets We Manage

As of December 31, 2025, MWM managed \$1,061,093,863 in client assets, all of which was managed on a discretionary basis. Additionally, the firm provides retirement plan consulting services on approximately \$9,857,216 of retirement plan assets held away.

Item 5 – Fees and Compensation

How We Are Compensated for Our Advisory Services

MWM's fees vary among the different types of advisory services we offer and may be negotiated at our sole discretion. The specific fees and way fees are charged and calculated are described in the client's investment advisory agreement. Clients should carefully review the investment advisory agreement prior to signing it.

Fees for our advisory services may be higher or lower than fees charged by other advisers who offer similar services. Clients may be charged different fees than similarly situated clients for the same services. Clients should carefully review this Brochure to understand the fees and other sources of compensation that exist among our services prior to entering into an investment advisory contract with our firm.

The firm's standard graduated fee schedule is as follows:

Assets Under Management	Annual Advisory Fee
First \$500,000	1.50%
Next \$500,000	1.25%
Next \$4,000,000	0.85%
Next \$5,000,000	0.75%
Amounts over \$10,000,000	0.60%

Fees are calculated and charged quarterly in advance based on the ending balance of the preceding quarter and are typically deducted directly from the client's account.

Upon termination of your advisory agreement with our firm, we will promptly refund any prepaid, unearned fees. Fees for partial quarters are prorated based on the number of days assets are managed.

Investment Management and Wealth Management Services

Investment management services are provided under our “Wrap Fee Program” whereby participants in the program receive portfolio management, financial planning, trading, custody reporting, and clearing services for one all-inclusive fee. A wrap fee program may or may not be the lowest cost option for clients who would like to restrict investments to open-end mutual funds or other long-term investment products. See our “Form ADV Part 2A Appendix 1- Investment Management Wrap Fee Program Brochure” for fee related information.

Retirement Plan Services

Fees charged for retirement plan services may be charged in advance or in arrears depending on the service provided. Fees are asset-based (not to exceed 1.5% annually) and are negotiable depending on the complexity of the service. Fee levels are primarily based on actual services to be provided.

Fees may be deducted directly from client accounts on a quarterly basis, or clients may elect to alternatively pay fees by check or wire transfer. There is a minimum annual fee of \$1,000 per plan.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. Any payments made in advance will be prorated and refunded to the client.

All retirement plan fees paid to MWM are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party.

Other Types of Fees and Expenses You May Incur

Clients may incur certain charges imposed by custodians, brokers, third-party investments and other third parties, such as custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Decisions to reallocate your account assets may result in a redemption fee imposed by one or more mutual funds held in your account. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges and fees are exclusive of and in addition to MWM’s fee. MWM shall not receive any portion of these charges or fees, including any distribution or “12b-1” fees paid by the mutual funds in which your account assets are invested. MWM primarily invests in individual securities that do not have any internal expenses.

There may be times when another broker-dealer is used to execute fixed-income trades (commonly referred to as “trading away” or “step out trades”). In instances where MWM has determined it is in the client’s best interest to utilize another broker-dealer to execute a transaction, the transaction cost

related to the trade will be included in the wrap program fee and any markup will be included in the price of the bond.

Other Types of Compensation We Receive

MWM has contracted with TradePMR, Inc. (“TradePMR”) for brokerage services, including trade processing, collection of management fees, marketing assistance and research. Item 12 – Brokerage Practices further describes the factors that MWM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation.

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

MWM does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), and consequently does not simultaneously manage performance-based and non-performance-based accounts.

Item 7 – Types of Clients

MWM provides services to individuals, businesses, and retirement plans.

The firm generally requires a minimum investment of \$2,000,000 for Wrap Program services; however, we reserve the right to decline accounts if we feel a relationship would not be beneficial or economical for the client or waive the minimum at our discretion.

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

Methods of Analysis and Investment Strategies

MWM’s investment strategy is designed to attempt to meet the client’s overall financial needs and achieve each client’s specific investment goals. An evaluation of a client’s financial data and investment objective is used to construct an investment portfolio and create an investment strategy that adheres to an agreed upon risk tolerance and portfolio allocation.

We base our investment policy and portfolio construction on many factors. One important factor is that we seek investments when they represent value, as measured by price to earnings ratios (P/E), price to sales ratios (P/S), and others. We believe market volatility can create value and opportunity. We attempt to take advantage of those opportunities. We believe investment markets can become inefficient and create opportunities. At times, shares of fundamentally strong companies may have stock prices that sell for less than intrinsic value. This may represent an opportunity for a patient long-term investor. It is our belief that the greatest potential for investment success comes from holding an investment for 3, 5, 7 years or longer and not focusing on the short-term.

All investments can have risk of loss and most investments can fluctuate in market value. We attempt to minimize some of that risk of loss through diversification. We therefore diversify equity investments in numerous ways: by market sectors and industries, by corporate capitalization, by interest rate sensitivity, by economic cycles, and by industry strength, among others.

Our philosophy focuses on investing in many companies that have strong track records of rising revenues and earnings, established management, and are leaders in their respective industries. A large number of our holdings are large capitalization stocks that are considered to be mature, established companies. Our portfolio turnover is typically low.

As part of our own primary research, we employ numerous analytical tools, including fundamental and technical analysis, market sentiment analysis and quantitative analysis when selecting investments for client accounts. Our investment team has over 98 years of combined investment experience.

At times, certain industry sectors may be under-weighted or omitted due to risk or valuation. Other industry sectors may be over-weighted because of potential opportunities. A broad selection of investments may be used to achieve our client's investment goals and objectives (e.g., ETFs, international investments, etc.). At times, the allocation towards equities may be reduced and the allocation in fixed income and other areas may be increased.

We conduct frequent investment reviews of our client portfolios. We are aware of clients' investment objectives, risk tolerance and investment and portfolio suitability. We communicate with clients and review their account objectives and risk tolerance information for accuracy and make changes if needed. At various times, we will rebalance investment allocations within industries and stocks to help achieve clients' long-term investment goals.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, political risk, and loss of capital, among others. Additionally, certain trading strategies can affect investment performance through increased brokerage activity and other transactions. Each client's propensity for risk, however, is thoroughly evaluated, documented, and considered throughout the portfolio implementation process. Although MWM intends to manage risk through the careful selection of investments, no investment strategy can ensure a profit or avoid a loss.

We may recommend a variety of security types for your account in an effort to achieve your individual needs and goals. Described below are the material risks associated with investing in the types of securities we generally use in client accounts.

Product Risks

Equity Securities

In general, prices of equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) are more volatile than those of fixed-income securities. The prices of equity securities could decline in value if the issuer's financial condition declines or in response to overall market and economic conditions. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

Fixed-Income Securities

The return and principal value of bonds fluctuate with changes in market conditions. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations. Changes in interest rates generally have a greater effect on bonds with longer maturities than on those with shorter maturities. If bonds are not held to maturity, they may be worth more or less than their original value. Credit risk refers to the possibility that the issuer of a bond will not be able to make principal and/or interest payments. High yield bonds, also known as "junk bonds," carry higher risk of loss of principal and income than higher rated investment grade bonds.

Mutual Funds

Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds, or U.S. government bonds. There are risks associated with each asset class.

An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although money market funds seek to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax.

Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary from day to day as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. These risks may become magnified depending on how much a fund invests or uses certain strategies. A fund's principal

market segment(s), such as large-cap, mid-cap or small-cap stocks, or growth or value stocks may underperform other market segments or the equity markets as a whole.

You can find additional information regarding these risks in the fund's prospectus.

Exchange-Traded Funds (ETFs)

ETFs are typically investment companies that are legally classified as open-end mutual funds or unit investment trusts. ETFs differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Liquidity risks are higher for ETFs with a large spread. ETFs may be closed and liquidated at the discretion of the issuing company.

International Investing

The risks of investing in foreign securities include loss of value as a result of political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and foreign exchange restrictions; settlement delays; and limited government regulation (including less stringent reporting, accounting, and disclosure standards than are required of U.S. companies). These risks may be greater with investments in emerging markets. Certain investments utilized by MWM may also contain international securities.

Cash and Cash Equivalents

A portion of your assets may be invested in cash or cash equivalents to achieve your investment objective, provide ongoing distributions, and/or take a defensive position. Cash holdings may result in a loss of market exposure.

Investment Strategies Risks

Security Recommendations in Opposing Directions

MWM manages customized portfolios designed to meet individual client needs in accordance with the client's IPS. Customization of client portfolios can lead to MWM recommending that certain clients buy a security and other clients sell the same security, which can result in material differences in account performance between clients.

Operational Risks

Business Continuity

MWM's operations could be disrupted by catastrophic events, such as fires, natural disasters, terrorist attacks, wars or similar emergencies resulting in property damage, network disruptions or prolonged power outages. Despite having contingency plans and conducting regular tests, it's impossible to prepare for every potential event. These risks could significantly impact our firm and our operations.

Pandemic Outbreak

Epidemics or pandemics can introduce market and business uncertainties, including market volatility, business closures, supply chain disruptions, travel restrictions and widespread medical absences. MWM has policies and procedures to manage these situations; however, the unpredictable nature of large outbreaks means not all eventualities can be anticipated or addressed. The COVID-19 pandemic highlighted the importance of having a robust Business Continuity Plan, which allows our personnel to work remotely or on a hybrid office-remote basis. Future incidents might impact operations differently, including those of our firm, product sponsors and key service providers.

Economic and Political Conditions

Economic changes, such as fluctuations in interest rates, inflation, currency values, industry conditions, competition, technological advancements, trade relations, political events and tax laws, can adversely affect investment performance. Economic, political and financial conditions, including military conflicts and sanctions, can cause market volatility, illiquidity and other negative effects. Economic or political instability, diplomatic issues or disasters in regions where client assets are invested could harm many kinds of investments. The potential for recession and its impact on different asset classes is uncertain and beyond our control, with no guarantees that we can predict these developments.

Cybersecurity

MWM and our service providers, counterparts and other market participants rely heavily on information technology and communications systems. These systems face numerous cybersecurity threats that can negatively impact clients, despite efforts to mitigate these risks through advanced technologies, processes and practices aimed at protecting system security and the confidentiality, integrity and availability of our clients' information. Unauthorized access, operational disruptions, data theft or inadvertent disclosure of sensitive information could occur, posing significant risks. A breach or security failure could lead to data or financial loss and system inaccessibility for clients and regulatory penalties, reputational damage or additional compliance costs for our firm.

Custody

MWM is obligated to keep client funds and securities over which it has custody with a qualified custodian. There is a risk of loss if a custodian faces insolvency, fraud or mismanagement. Cash and securities held in a brokerage account may exceed Securities Investor Protection Corporation coverage, which generally protects accounts up to \$500,000, including up to \$250,000 in cash. Clients are at risk if a brokerage firm holding their assets fails to fulfill its obligations or faces distress, potentially impacting your ability to access assets or utilize services. While non-cash assets held in custody at a bank are typically outside a failed bank's estate, client accounts could still be impacted by delays in accessing funds, settling trades or delivering securities due to a bank's failure.

Counterparties

Clients may face credit and liquidity risks from their dealings with various counterparties. Should a counterparty fail due to financial distress, recovering assets or funds under contractual agreements may be delayed or limited. The absence of independent evaluations of counterparties' financial health and a regulated market can increase potential losses, especially under adverse market conditions.

Key Persons

Clients' investment success heavily relies on the experience of our executives. Losing one or more key individuals could adversely impact clients' investment performance due to diminished strategy development, opportunity sourcing, relationship leveraging and investment expertise.

Artificial Intelligence

Certain service providers utilized by our firm to service client accounts may have artificial intelligence components. The use of artificial intelligence and machine learning includes increased risk of data inaccuracies and security vulnerabilities. Due to the rapid advancement of machine learning technologies, future risks related to artificial intelligence are unpredictable. As a measure to mitigate these risks to our clients, MWM performs periodic due diligence of our service providers for assurance that the service providers have appropriate controls in place to protect our clients' information and to limit data inaccuracies when artificial intelligence is used by the service provider.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. MWM is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 10 – Other Financial Industry Activities and Affiliations

MWM does not participate in any other financial industry activities and has no other financial industry affiliations.

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

Our Code of Ethics

MWM has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. The MWM Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and details practices for reviewing the personal securities transactions of supervised persons with access to client information. The Code also requires compliance with applicable securities laws, addresses insider trading, and details possible disciplinary measures for violations. MWM will provide a complete copy of its Code of Ethics to any client upon request to the Chief Compliance Officer. You may request a copy of our Code of Ethics by contacting us at (401) 364-5000.

Trading Conflicts of Interest

Individuals associated with MWM are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by MWM is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, MWM requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. MWM also requires prior approval from the Chief Compliance Officer for investing in any IPOs or private placements (limited offerings).

Participation in Client Transactions

MWM does not effect principal or agency cross securities transactions for client accounts. MWM also does not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells a security to an advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Selection and Recommendation of Broker-Dealers

We do not maintain custody of client assets. Client assets are maintained in an account at a non-affiliated “qualified custodian,” generally a broker-dealer or bank. We are not affiliated with any custodian, but instead all custodians are independently owned and operated. The custodian will hold your assets in an account and we will be able to buy and sell securities on your behalf.

We cannot open accounts for you, but we can assist you in opening an account at whatever custodian/broker you decide to use.

When recommending a custodian or broker for our clients, we consider many different factors, including quality of service, types of services offered, overall capability, execution quality, competitiveness of transaction costs, availability of investment research, reputation of the firm, and financial resources, among other things. In determining the reasonableness of a broker’s compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

Your Brokerage and Custody Costs

MWM’s investment management fees include costs for trade execution and custodial services. We have negotiated competitive pricing and services with the brokers and custodians we recommend that is based on the condition that our clients collectively maintain a certain level of assets at the custodian. We feel this commitment benefits you because we expect the overall rates you pay will be lower than they might be otherwise.

MWM utilizes TradePMR, Inc. (“TradePMR”) for brokerage and trade execution services. TradePMR clears trades and custodies assets with First Clearing, a FINRA member broker-dealer. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC., a non-bank affiliate of Wells Fargo & Company. TradePMR acts as an introducing broker dealer on a fully disclosed basis. TradePMR and First Clearing are members of SIPC and are unaffiliated registered broker dealers and FINRA members. The transaction fees charged by TradePMR or any other designated broker-dealer are separate of MWM’s fee, however, are incorporated into the wrap fee you pay. MWM regularly reviews these programs to seek to ensure that its recommendation is consistent with its fiduciary duty. Factors which MWM considers in recommending TradePMR and First Clearing or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research, and service. The transaction fees charged by these brokers may be higher or lower than those charged by other broker-dealers.

In addition, TradePMR provides MWM with access to its institutional trading and custody services, which are typically not available to retail investors. These brokerage services include the execution of securities transactions, research, and access to mutual funds and other investments that are

otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

MWM has negotiated institutional pricing with TradePMR for brokerage and trade execution services, which we believe to be consistent with our duty to obtain “best execution.” However, this institutional pricing could be higher than what another broker-dealer might charge to effect the same transaction. MWM has determined, in good faith, that this pricing is reasonable in relation to the value of the brokerage and research services received from TradePMR. 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, execution capability, transaction costs, and responsiveness. There may be times when another broker-dealer is used to execute fixed-income trades (commonly referred to as “trading away” or “step out trades”). In instances where MWM has determined it is in the client’s best interest to utilize another broker-dealer to execute a transaction, the cost of the transaction will be included in the wrap program fee. Consistent with the foregoing, while MWM will seek competitive rates, it may not necessarily obtain the lowest possible brokerage costs for client transactions.

TradePMR Asset Match Program

Effective October 1, 2025, through March 31, 2026 (or beyond if the program is extended), TradePMR is offering an asset match program to clients of MWM on new funds and investments transferred into an advisory account managed by MWM on the TradePMR brokerage platform. All securities and options available to trade on the TradePMR brokerage platform are eligible for the asset match. Non-eligible securities and products include private placements, mutual funds held directly with the fund company and are not listed on an exchange, unlisted interval and closed end funds, restricted securities not available for public trading, swaps and other over-the-counter derivatives, control shares, annuities, and any securities not held in an account on the TradePMR brokerage platform. The asset match offer does not apply to qualified plans and 529 accounts or transfers from other accounts held at Wells Fargo Clearing Services, Wells Fargo Advisors Financial Network or Wells Fargo Securities.

The asset match offer is 0.5% of the value of deposits into an advisory account managed by MWM on the TradePMR brokerage platform and is subject to a five-year earn-out period. The asset match will be earned if, on the 10th day of the calendar month following the month in which a deposit is made, no portion of the deposit has been withdrawn. If any portion or all of the deposit is withdrawn prior to the 10th day of the calendar month following the month in which the deposit was made, the match on that portion withdrawn will not be earned. The asset match may have tax implications depending on your account type and circumstances.

Certain limitations apply to the asset match program offered by TradePMR, such as an early removal fee if any assets are transferred out, withdrawn or distributed from an account receiving the asset match that causes the value of the account to be less than the value of the assets deposited into the account during a five (5) year period starting on the calendar day the asset match is credited to

the account. It is important for clients of MWM to review and understand the limitations of TradePMR's asset match program, which can be found on TradePMR's website at [TradePMR's Asset Match Program Terms and Conditions](#).

The asset match program is being offered by TradePMR, as the introducing broker-dealer for MWM's client accounts. In no way is MWM involved in the offering of the asset match program, nor does MWM's recommendation to use TradePMR for brokerage services constitute an endorsement of or recommendation to participate in the asset match program. You should be aware that the more assets there are in your account, the more you will pay in fees to MWM, which creates an incentive for MWM to recommend or encourage you to increase the assets in your account. Further, the early removal fee under the asset match program presents a conflict of interest between MWM and our clients. As a fiduciary, MWM is required to act in the best interest of our clients and seek to obtain the best price and execution for clients' securities transactions. It is MWM's policy to conduct a best execution review, at least annually, of the broker-dealers we recommend to clients to evaluate the broker's brokerage and execution practices. If at any point in the future MWM determines TradePMR no longer provides competitive and quality brokerage services, we may recommend another broker-dealer to our clients, which could result in a client participating in the asset match program to pay an early removal fee to TradePMR if assets are transferred out of an advisory account on the TradePMR brokerage platform. MWM will mitigate this conflict of interest by adhering to our fiduciary duty to seek to achieve best execution for our clients in a manner that the full range of and quality of a broker's services to the client is the most favorable under the circumstances and putting our clients' best interest first.

For more information on TradePMR's asset match program, please refer to TradePMR's website at [TradePMR's Asset Match Program Terms and Conditions](#).

Products and Services Available to Us from Brokers/Custodians

The custodians provide us and our clients with access to its institutional brokerage services, such as trading, custody, reporting, and related services, many of which are not typically available to retail customers. The custodians also make available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Other institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through the custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

The custodians may also make 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. They include investment research, both the custodians' own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodians. In addition to investment research,

the custodians may also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

The custodians may also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers, as well as discounts on products and services from third-party providers and discounted negotiated margin and lending rates for our clients.

The availability of these services from the custodians benefit us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with a particular custodian based on our interests rather than yours, which is a conflict of interest. We believe, however, that our recommendation of a custodian is in the best interests of our clients, and is primarily supported by the scope, quality, and price of the custodian's services and not the custodian's services that benefit only us.

Research and Other Soft Dollar Benefits

MWM does not participate in soft-dollar relationships.

Brokerage for Client Referrals

When selecting broker-dealers for the execution of client securities transactions, MWM does not consider whether we will receive any client referrals from the broker-dealer or any other third-party.

Directed Brokerage

As MWM will not request the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid, clients must direct MWM as to the broker-dealer to be used. The transaction costs charged by these broker-dealers could be higher or lower than those charged by other custodians and broker-dealers, which could result in a higher wrap program fee being charged by MWM. In directing the use of a broker-dealer, it should be understood that MWM will not have authority to negotiate transaction costs among various broker-dealers or obtain volume discounts. As such, best execution may not be achieved. Not all investment advisers require clients to direct the use of specific broker-dealers.

Aggregation of Transactions

MWM may, from time to time, aggregate client orders into blocks in order to facilitate more efficient account management and execution. When aggregating orders, an average price is given to all participants in the block, or other measures are taken, in order to treat all accounts fairly.

Item 13 – Review of Accounts

Review of Accounts

Accounts at MWM are reviewed on a periodic basis. Reviews may be general in nature, addressing investment objectives, risk tolerances or asset allocations, or they may be more detailed, depending on circumstances. The level of detail of the review is generally triggered by factors such as market, political, or economic conditions, or the client's individual financial situation. We encourage our clients to discuss their needs, goals, and objectives with us and keep us informed of any changes. Our clients who receive ongoing investment management services are contacted at least annually to determine whether there have been any changes to their financial situation or investment objectives and whether they wish to impose any reasonable restrictions on the management of their account or reasonably modify any existing restrictions. At this time, we will advise any account changes we feel are necessary to help our clients stay on track with meeting their financial goals and consider whether the current services provided by our firm continue to be suitable for their needs.

Regular Reports Provided to Clients

In addition to the monthly or quarterly statements and confirmations of transactions that clients receive from the custodian, MWM may provide other reports directly to the client from time to time depending on the type of engagement. Investment management clients, for example, may receive periodic holdings and/or performance related reports.

MWM urges clients to carefully review custodial statements and compare them to the reports which we may provide.

Item 14 – Client Referrals and Other Compensation

MWM does not compensate any outside parties for client referrals, nor do we receive any compensation or non-cash economic benefit for client referrals.

MWM does, however, receive economic benefits from our executing broker or custodian in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 above. The firm may also on limited occasions receive travel expense reimbursements for industry meetings related to market analysis, investment strategies, and practice management. The availability to us of these economic benefits is not based on us giving particular investment advice, such as buying or recommending particular securities for our clients. Furthermore, our representatives are required to make all investment decisions and recommendations based solely on the interests of the applicable client.

Item 15 – Custody

As noted in Item 12, MWM recommends that clients' assets be held by a qualified custodian. Although we do not hold assets, we may have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements to you.

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. MWM urges clients to carefully review custodial statements and compare them to any account reports that we might provide.

Item 16 – Investment Discretion

MWM will accept discretionary authority to manage securities accounts on behalf of clients, although we could also accept non-discretionary accounts in very limited circumstances.

When granted authority to manage accounts, MWM customarily has the authority to determine which securities and the amounts that are bought or sold. Any discretionary authority accepted by MWM, however, is subject to the client's risk profile and investment objectives and may be limited by any other limitations provided by the client in writing. MWM will not exercise discretionary authority until it has been given authority to do so in writing. Such authority is granted in the written agreement with the client, and in the written agreement with the third-party custodian.

Item 17 – Voting Client Securities

MWM does not vote proxies on behalf of clients. Clients are solely responsible for receiving and voting proxies for the securities in their account.

Item 18 – Financial Information

Registered investment advisers are required in some cases to provide certain financial information and/or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

MWM has no financial or operating conditions which trigger such additional reporting requirements.