



## **FIRM BROCHURE**

### ADV PART 2A

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Dated: March 19, 2021

### **ITEM 1 – COVER PAGE**

This ADV Part 2A Firm Brochure provides information about the qualifications and advisory business practices of FMB Wealth Management (“FMBWM”). FMBWM is a Registered Investment Advisor with the United States Securities and Exchange Commission (“SEC”) under the Investment Advisers Act of 1940, as amended (the “Advisers Act”). However, such registration of an investment advisor does not imply any level of skill or training. If you have any questions about the contents of this brochure, please contact us at (805) 446-4494 or by email at [info@fmbwealth.com](mailto:info@fmbwealth.com).

The information contained in this brochure has not been approved or verified by the SEC or by any state securities regulatory authority. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about FMB Wealth Management is also available on the SEC’s website at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov).

## ITEM 2 – MATERIAL CHANGES

### **Annual Update**

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This Brochure dated March 19, 2021 is our amended and most current Brochure, retiring our prior Brochure dated September 10, 2020.

### **Material Changes Since the Last Update**

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This section is intended to point out any material changes that have been made to our business and in this ADV Part 2A Disclosure Brochure since our prior Brochure, and to provide you with a summary of those material changes. We must state clearly that we are discussing only *material changes* since the last update of our Brochure.

Since our prior ADV Part 2A Firm Disclosure Brochure dated September 10, 2020 there have been no material changes to FMB's business.

### **Full Brochure Available**

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If you are receiving this information as a summary disclosure page, you may receive a complete copy of our firm's Brochure by contacting us by telephone at (805) 446-4494 or by email at [info@fmbwealth.com](mailto:info@fmbwealth.com).

Please review this Form ADV Part 2A Disclosure Brochure carefully for other important disclosures and information describing our firm and services we offer.

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## ITEM 4 – ADVISORY BUSINESS

### A. Advisor Background

FMB Wealth Management (“FMBWM”) is a privately-owned Registered Investment Advisor (RIA) registered with the Securities and Exchange Commission (SEC) ([www.sec.gov](http://www.sec.gov)) under the Investment Advisor’s Act of 1940, as amended. FMBWM’s registration with the SEC became active in 2001. FMBWM’s principal office is located in Westlake Village, California, with two branch offices, available by appointment only, located in Hermosa Beach, California and Rolling Hills Estates, California.

FMBWM’s principal majority shareholder and owner is Debra A. Fields, CFP®. Evan Z. Miller, CFP® and Grant Blindbury, CFP® are minority shareholders.

FMBWM and its investment advisor representatives (“IARs”) are considered “fiduciaries” and provide investment advice in the best interests of their clients as part of their fiduciary duty and impartial conduct standards.

### Management and Advisory Personnel

#### Debra A. Fields, CFP®

**Year of Birth:** 1958

**Designations:** CFP® (Certified Financial Planner™)

**Education:** BA French/Business, University of Redlands, 1980  
CFP® Certified Financial Planning Board of Standards, 1987

**Business** **FMB Wealth Management**

**Background:** President, CFO, Secretary (2018 – present)  
Secretary, Treasurer, and Director (2001 - present)

#### **FMB Retirement Services**

President, CFO, Secretary (2018 – present)  
Secretary, Treasurer and Director (2012 – present)

#### **FMB Insurance Services**

President, Secretary (2018 – present)  
Secretary, Treasurer and Director (2016 – present)

**Reportable Disclosures:** Ms. Fields has not been involved in a disclosure event where she was found liable in any civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

### Other Business

**Activities:** Debra A. Fields does not have any other business activities other than administrative management of FMBWM’s related advisor, FMB Retirement Services and FMBWM’s related insurance agency, FMB Insurance Services.

**Grant E. Blindbury, CFP®**

**Year of Birth:** 1979

**Designations:** CFP® (Certified Financial Planner™)

**Licenses:** NASAA Uniform Combined State Law Examination (Series 66)  
California Life, Health and Disability Insurance licensed

**Education:** BA Business, UCLA, 2001  
CFP® Certified Financial Planning Board of Standards, 2008

**Business** **FMB Wealth Management**, 2001 - present

**Background:** Partner, Director, Investment Advisor Representative

**FMB Retirement Services**, 2012 - present  
Partner, Director, Investment Advisor Representative

**Independent Financial Group**, 2005 - 2012  
Registered Representative

**Reportable Disclosures:** Mr. Blindbury has not been involved in a disclosure event where he was found liable in any civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

**Other Business**

**Activities:** Grant E. Blindbury is licensed to sell insurance products in the State of California and could receive insurance commissions for doing so.

Mr. Blindbury is a Director, Partner and IAR with FMBWM's affiliated Advisor through common ownership, FMB Retirement Services ("FMBRS").

Mr. Blindbury reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

**Evan Z. Miller, CFP®, CDFIA®**

**Year of Birth:** 1979

**Designations:** CFP® (Certified Financial Planner™)  
CDFIA® (Certified Divorce Financial Analyst®)

**Licenses:** NASAA Uniform Combined State Law Examination (Series 66)

**Education:** BA Business Economics, UCLA, 2001  
CFP® Certified Financial Planning Board of Standards, 2008

**Business** **FMB Wealth Management**, 2001 - present

**Background:** Partner, Director, Investment Advisor Representative

**FMB Retirement Services**, 2012 - present

Partner, Director, Investment Advisor Representative

**Independent Financial Group, 2005 - 2012**

Registered Representative

**Reportable Disclosures:** Evan Z. Miller has not been involved in a disclosure event where he was found liable in a civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

**Other Business**

**Activities:** Mr. Miller is a Director, Partner and IAR with FMBWM's affiliated Advisor through common ownership, FMB Retirement Services ("FMBRS"). Mr. Miller is also licensed to offer life, health and disability insurance in the State of California. Mr. Miller could receive insurance commissions for doing so directly from the individual insurance companies. This is not a substantial source of Mr. Miller's income and does not involve a substantial amount of Mr. Miller's time.

Additional locations may be available for meetings with Mr. Miller *by confirmed appointment only*:

555 Pier Avenue, Suite 4  
Hermosa Beach, CA 90254

28441 Highridge Road, Suite 110  
Rolling Hills Estates, CA 90274

Mr. Miller reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

**Jeremy J. Fields, CFP®, AIF®, RF™**

**Year of Birth:** 1988

**Designations:** CFP® (Certified Financial Planner™)  
AIF® (Accredited Investment Fiduciary®)  
RF™ (Registered Fiduciary™)

**Licenses:** NASAA Uniform State Investment Advisor Law Exam (Series 65)  
California Life, Health and Disability Insurance licensed

**Education:** University of San Diego, 2007 - 2010

**Business Background:** Partner, Investment Advisor Representative

**FMB Wealth Management, 2012 - present**

Managing Director, Investment Advisor Representative  
**FMB Retirement Services, 2012 - present**

Chief Financial Officer  
**FMB Insurance Services, 2018 - present**

**Reportable** Jeremy J. Fields has not been involved in a disclosure event where he was found

**Disclosures:** liable in any civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

#### **Other Business**

**Activities:** Jeremy J. Fields is a registered IAR employee with FMBWM's affiliated RIA under common ownership, FMB Retirement Services ("FMBRS").

Mr. Fields is also licensed to offer life, health and disability insurance in the State of California. Mr. Fields could receive insurance commissions for doing so directly from the individual insurance companies. This is not a substantial source of Mr. Fields' income and does not involve a substantial amount of Mr. Fields' time.

Jeremy J. Fields reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

#### **Daniel L. Mock, CFP®, M.S.**

**Year of Birth:** 1991

**Designations:** CFP® (Certified Financial Planner™)  
M.S. (Masters of Science)

**Licenses:** NASAA Uniform State Investment Adviser Law Exam (Series 65)  
California Life, Health and Disability Insurance licensed

**Education:** B.A. Economics, California Lutheran University  
B.A. Political Science, California Lutheran University  
Masters of Science (M.S.), Quantitative Economics, California Lutheran University

**Business** Intern

**Background:** **FMB Wealth Management;** 5/2013 – 8/2014

Investment Advisor Representative  
**FMB Retirement Services;** 8/2014 – Present

Partner, Investment Advisor Representative  
**FMB Wealth Management;** 8/2014 – Present

**Reportable Disclosures:** Daniel Mock has not been involved in any disclosure event where he was found liable in an arbitration claim alleging damages in excess of \$2,500, or found liable in a civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

#### **Other Business**

**Activities:** Mr. Mock is a registered IAR employee with FMBWM's affiliated RIA under common ownership, FMB Retirement Services ("FMBRS").

In addition, Mr. Mock is licensed to offer life, health and disability insurance in the State of California. Mr. Mock could receive insurance commissions for doing so directly from the individual insurance companies.

Daniel Mock reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

**Andrew J. Miller**

**Year of birth:** 1979

**Licenses:** NASAA Uniform State Investment Adviser Law Exam (Series 65)

**Education:** Bachelor of Science in Kinesiology, California State University, Northridge

**Business** Investment Advisor Representative

**Background:** **FMB Wealth Management;** 8/2016 – Present

Investment Advisor Representative

**FMB Retirement Services;** 1/2020 – Present

**Reportable Disclosures:** Mr. Miller has not been involved in any disclosure event where he was found liable in an arbitration claim, or found liable in a civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

**Other**

**Business:** Mr. Miller is also licensed to offer life, health and disability insurance in the State of California. Mr. Miller could receive insurance commissions for doing so directly from the individual insurance companies. This is not a substantial source of Mr. Miller's income and does not involve a substantial amount of Mr. Miller's time.

Andrew J. Miller reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

**Jake L. Berman**

**Year of birth:** 1995

**Licenses:** NASAA Uniform State Investment Adviser Law Exam (Series 65)

**Education:** Bachelor of Science in Business Administration, California State University Channel Islands, May 2017

**Business** Wealth Management Coordinator

**Background:** **FMB Wealth Management;** 9/2017 – Present

Intern

**FMB Wealth Management;** 4/2017 – 8/2017

**Reportable Disclosures:** Mr. Berman has not been involved in any disclosure event where he was found liable in an arbitration claim, or found liable in a civil, self-regulatory organization, or administrative proceeding; and has not been the subject of a bankruptcy petition.

**Other**

**Business Activities:** Mr. Berman has no other business activities.

Jake Berman reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

**Rachel Shin**

**Year of birth:** 1995

**Licenses:** NASAA Uniform State Investment Adviser Law Exam (Series 65)

**Education:** Bachelor of Arts in Business Administration, Concentration in Finance and Financial Planning - California State University Fullerton, May 2019  
Successfully completed the CFP® program and examination, March 2020

**Business** Intern

**Background:** **McCarthy Wealth Management;** 11/2018 – 04/2019

Advisor Support

**FMB Wealth Management/FMB Retirement Services;** 10/2019 – 07/2020

Investment Advisor Representative

**FMB Wealth Management;** 07/2020 – Present

Investment Advisor Representative

**FMB Retirement Services;** 07/2020 - Present

**Reportable Disclosures:** Ms. Shin has not been involved in any disclosure event where she was found liable in an arbitration claim, or found liable in a civil, self-regulatory organization, or administrative proceeding; she has not been the subject of a bankruptcy petition.

**Other**

**Business:** Ms. Shin is also licensed to offer life, health and disability insurance in the State of California. Ms. Shin could receive insurance commissions for doing so directly from the individual insurance companies. This is not a substantial source of Ms. Shin's income and does not involve a substantial amount of Ms. Shin's time.

Rachel Shin reports directly to Debra Fields for all FMBWM business. You may contact Ms. Fields at (805) 446-4494.

## B. Use of Professional Designations:

**Certified Financial Planner™ (CFP®).** The Certified Financial Planner™, CFP® and federally registered “CFP” marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP® Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Accredited Investment Fiduciary (AIF®).** The AIF® (Accredited Investment Fiduciary®) professional designation is the first and only designation that demonstrates knowledge and competency in the area of fiduciary responsibility. With the media awash with stories of financial scandals, investors are demanding that investment advisors embrace a higher standard of practice than ever before. The AIF® professional designation and certification is issued by the Center for Fiduciary Studies, and the training is the best way for investment fiduciaries and professionals to absorb the Prudent Practices, their legal underpinnings and how to apply them within existing fiduciary policies and procedures.

Holders of the AIF® mark have successfully completed this specialized program on investment fiduciary standards and subsequently passed a comprehensive examination. To qualify for the AIF® Designation, candidates must meet minimum criteria for Screening, Education and Training standards, Professional Development standards, and Relevant Industry Experience standards.

The AIF® training concludes with an examination in order to apply for and earn the AIF® Designation. The AIF® final exam is a proctored exam. The requirement for a proctor ensures the integrity of the examination process as one of the high standards for earning the AIF® Designation.

**Certified Divorce Financial Analyst® (CDFA®).** A Certified Divorce Financial Analyst® is a trained professional who has passed certain tests to become a financial analyst specializing in divorce issues. A Certified Divorce Financial Analyst® is commonly used where there are large marital assets or a business to be divided.

The role of the CDFA® includes acting as an advisor to one party's divorce lawyer, or as a mediator for both parties. A CDFA® uses his or her knowledge of tax law, asset distribution, and short- and long-term financial planning to achieve an equitable settlement.

To become a CDFA®, a person must have two years of financial planning or legal experience. After attaining the proper work experience, candidates are required to complete a four-step modular program and exam designed by The Institute for Divorce Financial Analysts (IDFA™). IDFA™ is the premier national organization dedicated to the certification, education, and promotion of the use of financial professionals in the divorce arena. The Institute provides comprehensive training using a variety of knowledge and skill-building techniques. Candidates will learn how to help their clients with financial issues that will affect the rest of their lives, and they will receive the Certified Divorce Financial Analyst® (CDFA®) designation after successfully completing the course. The program is a self-study system, covering financial and tax issues, with case studies of divorce settlements.

**Registered Fiduciary™ (RF™).** The Registered Fiduciary™ (RF™) certification identifies financial professionals that have achieved pertinent academic qualifications and licenses,

learned required practices, and have passed a background check.

The RF™ certification prepares a candidate to comply with the regulatory requirements of acting as a fiduciary under current laws. The RF™ certification is continuously being updated to reflect the most recent regulatory, marketplace and technology changes.

This fiduciary standard distinguishes RF™ designated professionals as having met the highest standard in the financial industry. All valid certified RF™ are listed on the Registry of Fiduciary Professionals. RF™ certifications are further defined by specialties. Each designee has one or more specialties that identify the services that he/she is qualified to provide.

### **C. Advisory Services**

FMB Wealth Management provides wealth management services for individual and qualified retirement plan clients. Wealth management is comprised of investment consulting, advanced planning and relationship management services. Investment consulting incorporates historical portfolio performance analysis, risk evaluations, and asset allocation. Advanced planning involves wealth enhancement (tax and cash-flow planning), wealth transfer (transferring wealth effectively), wealth protection (risk mitigation and transferring risk to insurance companies) and charitable giving.

FMBWM uses passively managed index mutual funds and Exchange Traded Funds (ETF's) from various asset classes to achieve diversification. Many of the funds used are from Dimensional Fund Advisors (DFA). Index funds from Vanguard, funds from Gurtin Municipal Bond Management, as well as listed Exchange Traded Funds (ETF's), may also be used. These funds are purchased and held at an independent third-party discount stock brokerage firm (Charles Schwab or TD Ameritrade), or with another qualified retirement plan custodian.

For participant-directed defined contribution pension plans held with qualified custodians, FMBWM IARs will review and analyze all available investment options.

### **D. Client Needs**

IARs conduct initial discovery meetings with each potential advisory client to discuss their financial needs, personal goals, risk tolerance and overall investment objectives in depth. It is beneficial to the client for each client to provide accurate and candid information and promptly inform their IAR of any material changes in their circumstances as soon as a change occurs so their IAR can re-evaluate their portfolio to see if adjustments to the advisory account portfolio are necessary. Clients may impose restrictions on investing in certain securities or types of securities in most advisory programs.

### **E. Wrap Programs**

FMBWM and its associated IARs do not offer or participate in wrap fee programs.

### **F. Client Assets Under Management**

As of December 31, 2020, our fiscal year end, FMB Wealth Management managed approximately 662 accounts and \$312,633,707 in assets, all on a discretionary basis.

## ITEM 5 – FEES AND COMPENSATION

### A. Compensation for Advisory Services

FMBWM is compensated for advisory services by fees based on the value of the Client accounts at the end of each calendar quarter. FMBWM's general compensation schedule is as follows:

<u>Value of Managed Accts</u>	<u>Quarterly Fee</u>	<u>Annualized Fee</u>
First \$2.5 million	0.250%	1.00%
\$2.5 million to \$5 million	0.200%	0.80%
\$5 million to \$10 million	0.175%	0.70%
\$10 million to \$20 million	0.125%	0.50%
\$20 million and over	0.100%	0.40%

Advisory fees within FMBWM's programs are negotiable.

FMBWM may provide certain fee-based discounts, such as "family" group account discounts to multiple accounts within a family or household. This discounted "family" rate varies and may be based on total family assets under management.

### B. Billing Method

Advisory Fees are payable quarterly in arrears. Payments are due and will be calculated on the last day of each calendar quarter based on the value of the Account assets under management as of the close of business on the last business day of that quarter as valued by the custodian.

The first payment will be assessed pro-rata in the event the Agreement is executed at any time other than the first day of the calendar quarter. The payment will be deducted from Clients' accounts based on prior approval from the client as set forth in their specific client service agreement.

In the event a client closes their account or authorizes an account transfer out, the last payment will also be assessed pro-rata in the event the account closing, or transfer is effected prior to the calendar quarter end. The payment will also be deducted from clients' accounts prior to distribution or transfer in accordance with their executed FMB Client Agreements.

### C. Other Fees and Expenses

No start-up or account establishment fees are charged by FMBWM. The FMBWM advisory fees are separate from any brokerage transaction fees, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund transfer fees, and other related costs, expenses and/or fees charged by the account's third-party custodians, brokers, third party money managers and other third parties for brokerage accounts and securities transactions in non-wrap accounts. FMBWM and its IARs do not receive any portion of those fees.

Mutual Funds and Exchange Traded Funds (ETFs) charge internal management fees which are disclosed in each of the individual fund's prospectus. Program advisory fees do not include certain charges such as 12b-1 (marketing) fees paid by mutual funds held in clients' account, which may be retained by an IAR also acting as a registered representative of a broker-dealer firm.

FMBWM IARs do not also act as registered representatives of a broker-dealer firm. Therefore, no 12b-1 fees may be received by an associated IAR with respect to any assets in a client account, subject to the prohibited transaction rules of the Internal Revenue Code which are substantially the same as ERISA. The 12b-1 fees are included among normal mutual fund expenses and are fully described and explained in the respective mutual fund prospectus.

#### **D. Termination**

In the event a client closes their account or authorizes an account transfer out, thereby terminating their account, the last payment will be assessed pro-rata, in arrears, in the event the account closing, or transfer is effected prior to the calendar quarter end. The payment will be deducted from clients' account prior to distribution or transfer, in accordance with their executed FMB Client Agreements. The account custodian may charge a termination fee.

#### **E. Additional Compensation**

IARs/Supervised Persons registered with FMBWM may also be IARs/Supervised Persons with our affiliated RIA, FMB Retirement Services ("FMBRS"). If IAR/Supervised Persons are registered with one or both advisors, they may receive investment advisory fee compensation from that advisor.

Additionally, FMBWM IARs may receive insurance commissions when clients purchase insurance products through them as independent insurance agents. Such insurance transactions are placed directly through individual insurance companies, and compensation may be paid either directly to insurance agent/IAR, or may be paid to FMBWM's affiliated insurance agency, FMB Insurance Services. In rare cases where an FMBWM IAR makes a recommendation to a FMBWM client to purchase an insurance policy in the IAR's capacity as an insurance agent, and the client accepts the recommendation resulting in an insurance commission being paid to the IAR, the IAR will waive offsetting advisory fees in the client's FMBWM advisory account in the amount received from the insurance company for the policy placement. This is done voluntarily by FMBWM to minimize or eliminate the conflict of interest that exists when the IAR is acting in a dual capacity of IAR with FMBWM and independent insurance agent. In no case will the IAR be compensated for a commissionable transaction and also receive a fee for the same asset.

#### **IF APPLICABLE:**

**ERISA Accounts:** FMBWM is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and

obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, FMBWM may only charge fees for investment advice about products for which our firm and/or our related persons do not also receive any commissions or 12b-1 fees.

**Advisory Fees in General:** Clients should note that similar advisory services may be available from other registered (or unregistered) investment Advisors for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

## **ITEM 6 – PERFORMANCE FEES**

FMBWM does not charge performance-based fees or fees based on capital gains or capital appreciation of client assets.

## **ITEM 7 - TYPES OF CLIENTS**

FMBWM provides wealth management services to individuals, high net worth individuals, trusts, business owners, and corporations. The minimum initial account size managed by IARs through FMBWM is \$1,000,000. The minimum account size requirement can be waived by FMBWM at their discretion.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **A. Methods of Analysis**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

***Long Term Diversified Asset Allocation.*** Rather than focusing primarily on securities selection, we attempt to create an appropriate ratio of securities suitable to the client's investment goals and risk tolerance based on a modern portfolio theory funded primarily with passive index funds.

A risk of a long-term diversified asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

***Passive Index Mutual Fund Analysis.*** We monitor the funds or ETFs to determine if they are continuing to follow their stated investment strategy and to ensure that there has been no style drift.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the

same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **B. Investment Strategies**

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriately matched 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.** We purchase securities, including index funds, with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, a security may decline sharply in value before we make the decision to sell.

By using index funds, FMBWM can place the clients' money in the desired asset classes. These funds remove the managers' discretion in choosing the securities that are purchased. The fund investments are determined by the definition of the index or asset class and the managers simply purchase securities to match the index. For example, instead of finding a fund manager that buys large cap U.S. stocks to outperform the S&P 500 Index, FMBWM buys a fund with the identical stocks to the S&P 500 index. This style will avoid the risk of exposing the client to a fund manager that is out of phase or simply picks the wrong securities as well as generating excessive trading costs. For taxable investors index funds and tax-managed index funds also produce exceptionally low capital gain distributions due to the low fund turnover.

The general asset classes used are short-term U.S. bonds (1–2-year average maturity), large U.S. stocks, small U.S. stocks, large international stocks, small international stocks and a real estate index. The portfolios may also be invested with value index funds that match the "value" (high book to market value) component of each equity class. Unless otherwise requested by the client, their portfolio is balanced using 15% to 40% short-term bonds. The remainder is spread among the previously listed equity asset classes. All portfolios assume that the investor has a minimum 3-year commitment for the conservative balance, 3-5 years for the aggressive balance. The client can request that a limited amount of selected individually listed securities, actively managed mutual funds or mortgages be placed in the account, but even these will be assumed to be held for the long term.

Most of the funds are from Dimensional Funds Advisors (DFA), which specializes in no load asset class funds. DFA is an Institutional index fund company known for its exceptionally low turnover and management fees. To purchase a fund directly from DFA prior approval is needed, along with a \$2 million minimum investment. Because FMBWM has received approval from DFA, we are able to invest clients' assets with DFA through Charles Schwab or TD Ameritrade. Index funds from Vanguard, Gurtin Municipal Bond Management, as well as listed Exchange Traded Funds (ETF's), may also be used. Clients' accounts are opened and run through a discount brokerage custodian (Charles Schwab or TD Ameritrade) with daily price and transaction activity downloaded to FMBWM's office. Portfolio management software is used to track the investments, produce reports, and reconcile accounts. These reports show the asset class weighting, the investment performance of portfolios is reviewed, and the asset class balance is analyzed. If warranted by clients' objectives and transaction costs, the portfolio will be either rebalanced or continued without changes.

### **C. Risk of Loss**

Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

IARs work with advisory clients to determine appropriate allocation models and overall investment strategies during an initial in-depth discovery meeting. Clients are asked questions related to their values, interests, relationships, goals, current advisors, and assets. Clients should discuss their objectives and risk tolerance with their IAR thoroughly. No assumption can be made that any particular strategy will provide better returns than other investment strategies.

### **D. Sources of Information**

To help develop its strategies and recommendations, FMBWM uses commercially available services, specifically financial publications and information services dealing with investment research and taxation. Such information may be obtainable in print, on computer media, via the internet, or via some other electronic means. Company prepared materials (particularly prospectuses) and research releases prepared by others are also utilized. As an investment advisor, FMBWM also has the opportunity to access information from a variety of experts, whether through personal visits, telephone calls, or at industry or related meetings. Independent, third party registered investment advisors may also be employed to provide additional expertise in unique situations.

Before participating in any investment, clients should carefully consider the risks associated with each investment by reviewing the respective prospectus, offering memorandum or disclosure brochure prepared by the issuing company. The various applicable mutual fund, annuity and private fund prospectuses serve as important sources of risk disclosure that should be read carefully. Investing in securities involves risk of loss that clients should be prepared to bear.

The following describes common characteristics of risk associated with specific types of investments that may be recommended by FMBWM in client accounts.

Mutual Funds: Each mutual fund has different risks and rewards. Generally, the higher the potential return, the higher the risk of loss. Investors may have to pay taxes on capital gains distributions received even if the fund goes on to perform poorly after the investor bought shares.

Money Market Funds: Although Money Market Funds have relatively low risks, the NAV may fall below \$1.00 if the fund performs poorly, therefore, losses are possible.

Fixed Income Securities: Fixed income investments tend to be more conservative than stocks. However, clients should be aware that bonds and bond funds do carry some degree of risk including but not limited to interest rate, credit, inflation, pre-payment and reinvestment risks.

ETFs: Exchange Traded Funds (ETFs), like stocks and index funds can carry a significant amount of market risk. The appeal of an ETF is that it represents many assets or companies, like an indexed mutual fund, but unlike a mutual fund that prices Net Asset Value on a daily basis, ETFs can be traded at any time during trading hours, like a stock. Investing in ETFs involves volatility and risk of losses that Clients should be prepared to withstand.

Use of Margin: Securities purchased on margin are used as the account custodian's collateral for the margin loan made to an advisory clients' account. If the securities in an account declines in value, so does the value of the collateral supporting the margin loan, and, as a result, the account custodian can take action, such as issue a margin call and/or sell securities or other assets in any of the accounts held with that custodian firm, in order to maintain the required equity in the account. It is important that Clients fully understand the risks involved in trading securities on margin.

## **MARGIN DISCLOSURE STATEMENT**

Margin risk includes the following:

- You can lose more funds than you deposit in the margin account.
- The account custodian can force the sale of securities or other assets in your account(s).
- The firm can sell your securities or other assets without contacting you.
- You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.
- The account custodian can increase its "house" margin maintenance requirements at any time and is not required to provide you advance written notice.
- You are not entitled to an extension of time on a margin call.

When clients execute transactions using margin, they must keep these important rules and conditions in mind. Clients with any questions or concerns are advised to contact your IAR, or FMBWM's Chief Compliance Officer, David Howerton.

## **ITEM 9 – DISCIPLINARY ACTION**

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be considered material to clients' or prospective clients'

evaluation and/or selection of an Advisor. FMBWM has no disciplinary history applicable to this item.

The details of FMBWM's status, or any Advisor's status, can be found on the SEC's Investment Advisor's Public Disclosure site (IAPD) [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov). Clients can access the Firm's or any IAR disciplinary history by clicking on this link.

#### **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

FMBWM's sole business is as a Registered Investment Advisor. As previously disclosed, IARs of FMBWM may also be engaged in the insurance business as independently licensed insurance agents. IARs may receive insurance commissions if clients choose to implement recommendations offered through an insurance company. If a client chooses to make a commission-based insurance purchase through an insurance broker or agency recommended by an FMBWM IAR this may present a conflict of interest to the extent the IAR may have a financial incentive to recommend certain products and services through that insurance broker or agency in lieu of other financial institutions.

In infrequent cases where an FMBWM IAR makes a recommendation to a FMBWM client to purchase an insurance policy in the IAR's capacity as an insurance agent, and the client accepts the recommendation, resulting in an insurance commission being paid to the IAR, again outside of the FMBWM account, the IAR will waive advisory fees in the client's FMBWM advisory account in the amount of the insurance commission received from the insurance company for the policy placement. This is done to minimize or eliminate the conflict of interest that exists when the IAR is acting in a dual capacity of IAR with FMBWM and independent insurance agent. In no case will the IAR be compensated for a commissionable transaction and also receive a fee for the same asset.

#### **ITEM 11 – CODE OF ETHICS: PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

FMBWM has adopted a Code of Ethics that is designed to comply with the Investment Advisors Act of 1940, SEC Rule 204A-1 and federal securities laws. The Code of Ethics requires certain covered persons, including IARs, to adhere to the highest business standards and conduct their affairs with integrity and competence when dealing with the public, clients, prospects, and employees. The Code of Ethics outlines acceptable and unacceptable activities for IARs. The Code of Ethics also requires IARs to report personal securities transactions to FMBWM on a quarterly basis and contains guidelines for how client transactions must be given preference over personal transactions by the IAR. A copy of the Code of Ethics is available to clients and prospects upon request.

FMBWM and its IARs may invest in or otherwise own an interest in the same securities that are recommended to clients. This creates a potential conflict of interest. All IARs are required to place the interests of clients ahead of their own when making personal investments. In addition, FMBWM requires that client transactions be placed before IAR personal transactions. Personal trading by IARs is monitored by FMBWM. IARs may also buy or sell a specific security for their own account based on personal investment considerations, which the IAR

does not deem appropriate to buy or sell for clients.

FMBWM does not make a market in any securities and does not buy or sell securities for its own account. No principal transactions with FMBWM shall be affected in the accounts by FMBWM. No agency-cross transactions (as such term is defined in Advisors Act Rule 206(3)-2(b)) for Client transactions will be executed by FMBWM.

## CODE OF ETHICS

FMBWM's Code of Ethics is based upon the principle that FMBWM and its employees and advisors owe a fiduciary duty to clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The purpose of FMBWM's Code of Ethics is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading, and other forms of prohibited or unethical business conduct. As such, FMBWM and its employees are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. FMBWM and its employees have an affirmative duty of utmost good faith to act solely in the best interest of its clients.

FMBWM has adopted the following Code of Ethics in accordance with applicable state and federal requirements:

- **Fiduciary Responsibility-** FMBWM and its associated persons shall exercise the highest standard of care in protecting and promoting the interests of its clients and will provide a written disclosure statement containing any conflicts of interest that may compromise their impartiality or independence. As a fiduciary, FMBWM shall only accept fees or compensation in accordance with the professional investment advisory services engaged to provide by customer-executed agreement.
- **Integrity-** All professional services shall be rendered with the highest level of integrity.
- **Objectivity-** FMBWM and its staff shall provide advice that is objective and in the best interest of the client and without conflicts of interest.
- **Competence-** FMBWM and its staff shall maintain the necessary knowledge and skills to provide our clients with competent advice and services.
- **Fairness-** All professional services shall be performed by FMBWM and its staff in a manner that is fair and reasonable to its clients.
- **Confidentiality-** FMBWM and its staff shall maintain and safeguard all confidential client information in accordance with applicable laws.

- Diligence- FMBWM and its staff shall ensure the accuracy and completeness of records, information, and data collected, used and managed, and will take necessary steps to correct any discrepancies.
- Regulatory Compliance- FMBWM and its staff shall comply fully with appropriate laws and internal regulations.

FMBWM will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

### **Participation/Interest in Client Transactions**

On occasion, FMBWM and its management persons may own securities or securities products that are managed and in the custody of institutional, third-party money managers that are also recommended to clients which may present a potential conflict of interest. Such securities are kept in separate accounts by said money managers and are not commingled. Additionally, as a preventative measure, all client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of FMBWM. In addition to this measure, all the management persons of FMBWM will act in accordance with applicable securities laws and conduct their business to ensure overall compliance with Insider Trading rules and the Securities Fraud Enforcement Act of 1988.

Clients of FMBWM are under no obligation to act upon the recommendations made by IARs of FMBWM. Lower fees for comparable services may be available from other sources.

### **ITEM 12 – BROKERAGE PRACTICES**

FMB requires the client to appoint a custodian for their accounts. Generally, FMBWM manages client accounts through TD Ameritrade Institutional or Charles Schwab Institutional as the custodian for their accounts, but clients are under no obligation to choose either as their account custodian. FMBWM does not direct trades to any chosen custodian, broker, or firm. Trades are not aggregated. Trades are done on an individual basis to help ensure proper execution.

### **ITEM 13 – REVIEW OF ACCOUNTS**

FMBWM IARs are responsible for reviewing their clients' advisory accounts at least quarterly and conducting a complete account annual review. Additional triggering events resulting in additional reviews may include responses to or requests by clients, market events, or specific target dates. More frequent account reviews may occur as IAR or FMBWM may deem appropriate based on, but not limited to, size or value of account, portfolio positions or holdings, economic conditions, and market conditions.

Clients will receive trade confirmations and periodic account statements from the custodian of their accounts. In addition, clients will receive quarterly portfolio performance reports from FMBWM. FMBWM prepares these pre-approved, pre-formatted reports directly from information received from the account custodians. Clients are encouraged to review and

compare the account information (for example, market values, transactions, and advisory fees) in the reports and additional IAR reporting to the account statements received from the custodian.

### **Individual Portfolio Management**

While the underlying securities within the advisory accounts are continually monitored, these accounts are reviewed at least annually. Accounts are reviewed in the context of each client's stated investment objectives, risk tolerance, financial needs, investment timeline, and other guidelines established. These accounts are reviewed by the client's IAR periodically and may be reviewed and spot-checked as part of the firm's overall surveillance program by FMBWM's Compliance Department.

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.

### **Third-Party Money Managers**

Clients who have these accounts should refer to the independent third-party money manager or registered investment advisor's Firm ADV 2A Disclosure Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reviews provided by that third-party advisor.

As stated above, advisory accounts are monitored continuously, with more detailed review conducted by the IAR with their clients on an annual basis.

Third-party managed account statements are distributed by the respective money manager to account holders at least quarterly. FMBWM receives duplicate copies of these statements and uses these duplicate statements for review and record maintenance.

### **Consulting Services**

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Service clients unless otherwise mutually agreed to by executed service agreement. Such reviews will be conducted by the client's individual FMBWM investment advisor representative.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

FMBWM does not receive an economic benefit from anyone who is not a client, including sales awards or other "prizes", for providing investment advice or other advisory services to our clients.

### **Referrals and Solicitors**

FMBWM does pay client referral or "solicitor" fee compensation for clients referred to FMBWM, in accordance with the specific terms of each individually executed Solicitor Agreement.

FMBWM may receive solicitor referrals from third parties that are not affiliated with FMBWM. The third parties will be paid a percentage of the fees that the Client pays to FMBWM. In these situations, in accordance with SEC Rule 206(4)-3 under the Investment Advisers Act of 1940, a Solicitor Agreement is executed between FMBWM and the third party. FMBWM or the Solicitor will provide a Solicitor's Separate Written Disclosure Statement to the Clients at the time of the solicitation or referral disclosing the nature of the relationship with FMBWM and the amount of referral fees paid.

In compliance with SEC Rule 206(4)-3, solicitor referral arrangements between FMBWM and third-party (non-employee) solicitors are in writing, and include provisions related to (a) the scope of the solicitor's activities; (b) a covenant by the solicitor to perform such activities consistent with instructions of FMBWM and in compliance with the Investment Advisers Act of 1940 and associated rules; and (c) a covenant by the solicitor to provide the client with a copy of FMBWM's Form ADV Part 2A and a separate written solicitor disclosure.

In no instance do the fee arrangements described above increase the fee that the client pays to FMBWM. While these relationships allow for access to potential clients who may not have otherwise been found, it also creates a potential conflict of interest because of the financial incentives for the party referring those prospects to FMBWM. In other words, when a referral is made to FMBWM resulting in the payment of a fee, this presents a conflict of interest in that FMBWM, the IAR, and the third-party solicitor may prefer to refer business to each other over other investment advisors due to the compensation incentives offered through the referral.

FMBWM addresses this conflict by making full disclosure of all potential payment scenarios and relationships with third party / solicitors to clients and completing periodic reviews of solicitor relationships and agreements.

The Securities and Exchange Commission ("SEC") has rules governing these relationships under the Advisors Act. Rule 206(4)-3 of the Advisors Act (commonly referred to as "The Cash Solicitation Rule") governs referral arrangements of investment advisors registered with the SEC. Pursuant to the Rule, a federally registered investment advisor is prohibited from paying a cash fee directly or indirectly to a solicitor with respect to solicitation activities, unless certain conditions are observed. FMBWM monitors all solicitor and referral activities to ensure they observe all required conditions, and FMBWM remains in compliance with the above referenced rules and regulations.

### **Employee Bonus Compensation**

FMBWM provides to its employees bonus compensation, in addition to any regular salary, for referring new clients to the firm. FMBWM will pay the advisory employee 50% of the first year's total management/advisory fee paid by the new client as a bonus.

### **Client Gifts**

FMBWM may at times give a small gift to Clients and third parties, some of whom may be referring Clients to it ("thank-you gifts"). These gifts are typically of nominal value and are not

based on a percentage of the actual or anticipated earnings that FMBWM would generate or expect to generate from any new Clients referred or gained.

#### **ITEM 15 - CUSTODY**

Custody, as it applies to investment advisors, has been defined as having access or control over client funds and/or securities, but does **not** include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment advisor can access or control client funds or securities, the investment advisor is deemed to have custody for purposes of the *Investment Advisers Act of 1940* and must ensure proper procedures are implemented.

Please note that regulators have deemed the authorization to trade in client accounts to not be custody. However, we are deemed to have limited custody of client funds whenever we are given the authority to have fees deducted directly from client accounts or accept clients' instructions to send funds upon client requests. Our procedures do not include or allow the use of standing third party letter of authorizations ("SLOAs"), but we do require and allow first party letters from clients requesting funds from and to their own accounts.

For accounts where we are deemed to have limited custody, based on the description above, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the creation of all accounts and therefore are aware of the qualified custodian's name, address and the way the funds or securities are maintained.

Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from us. When clients have questions about their account statements, they should contact us or the qualified custodian preparing the statement.

#### **ITEM 16 - INVESTMENT DISCRETION**

IARs have the authority to manage investments on a discretionary basis as set forth in the advisory agreement. FMBWM and its IARs do not have the authority to withdraw funds or take custody of client funds or securities under any circumstance.

Clients may grant IAR discretionary authority to determine the securities and/or amount of securities to be bought or sold as set forth in the account agreement.

#### **ITEM 17 – VOTING CLIENT SECURITIES**

As a matter of firm policy, FMBWM and its IARs do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the way proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making

all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Clients retain the right and responsibility to vote all proxies solicited for securities held in their account. FMBWM and its IARs are precluded from voting proxies on behalf of a client, and do not offer any consulting assistance regarding proxy issues to clients.

## **ITEM 18 – FINANCIAL INFORMATION**

Investment Advisors are required to provide certain financial information or disclosures about their financial condition. FMBWM has no financial circumstances to report and has no financial commitment that would impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy petition or proceeding at any time.

## **ITEM 19 – PRIVACY POLICY**

Your relationship with FMBWM is based on trust and confidence. To fulfill its responsibilities to you, FMBWM requires that you provide current and accurate financial and personal information. You deserve to expect that FMBWM will protect the information you have provided in a manner that is safe, secure, and professional. FMBWM and its employees are committed to protecting your privacy and to safeguarding that information.

### **Safeguarding Customer Documents**

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours, access to customer records is monitored so that only those with approved entitlements may access the files. During hours in which the company is not in operation, the customer records will be secured.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe FMBWM procedures regarding customer and consumer privacy will result in disciplinary action and may include termination.

### **Sharing Non-Public Personal and Financial Information**

FMBWM is committed to the protection and privacy of its customers' and consumers' personal and financial information. FMBWM will not share such information with any affiliated or non-affiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of FMB Wealth Management’s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer’s instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

### **Opt-Out Provisions**

It is not a policy of FMB Wealth Management to share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to “opt out”.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. We reserve the right to change this policy at any time and you will be notified if any changes do occur.

If you have any questions after reading this Privacy Policy, please contact us by writing to:

<p><b>FMB Wealth Management</b> Attention: Privacy Officer 100 N. Westlake Blvd., Suite 201 Westlake Village, CA 91362</p>
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