

COROEBUS WEALTH MANAGEMENT FIRM BROCHURE - FORM ADV PART 2A

This brochure provides information about the qualifications and business practices of Coroebus Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 646-542-4555 or by email at: taraje@coroebuswm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Coroebus Wealth Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Coroebus Wealth Management, LLC's CRD number is: 168418.

140 Prospect Ave Suite 1S
Hackensack, NJ 07601

Registration does not imply a certain level of skill or training.

Version Date: 11/14/2023

Item 2: Material Changes

Coroebus Wealth Management, LLC has filed an annual updating amendment using the Form ADV Part 2A. There are no material changes to report.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes	i
Item 3: Table of Contents	ii
Item 4: Advisory Business	5
A. Description of the Advisory Firm	5
B. Types of Advisory Services	5
Portfolio Management Services	5
Selection of Other Advisers	6
Financial Planning	6
Services Limited to Specific Types of Investments	6
C. Client Tailored Services and Client Imposed Restrictions	6
D. Wrap Fee Programs	6
E. Assets Under Management	7
Item 5: Fees and Compensation	7
A. Fee Schedule	7
Portfolio Management Services Fees	7
Selection of Other Advisers Fees	7
Financial Planning Fees	8
Fixed Fees	8
B. Payment of Fees	8
Payment of Portfolio Management Fees	8
Payment of Selection of Other Advisers Fees	8
Payment of Financial Planning Fees	8
C. Clients Are Responsible For Third Party Fees	8
D. Prepayment of Fees	9
E. Outside Compensation For the Sale of Securities to Clients	9
Item 6: Performance-Based Fees and Side-By-Side Management	9
Item 7: Types of Clients	9
Minimum Account Size	9

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss	10
A. Methods of Analysis and Investment Strategies	10
Methods of Analysis	10
Fundamental analysis	10
Technical analysis	10
Cyclical analysis	10
Investment Strategies	10
B. Material Risks Involved	10
Methods of Analysis	10
Fundamental analysis	10
Technical analysis	10
Cyclical analysis	10
Investment Strategies	11
C. Risks of Specific Securities Utilized	11
Item 9: Disciplinary Information	13
A. Criminal or Civil Actions	13
B. Administrative Proceedings	13
C. Self-regulatory Organization (SRO) Proceedings	13
Item 10: Other Financial Industry Activities and Affiliations	13
A. Registration as a Broker/Dealer or Broker/Dealer Representative	13
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	13
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests	13
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections	14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	14
A. Code of Ethics	14
B. Recommendations Involving Material Financial Interests	14
C. Investing Personal Money in the Same Securities as Clients	14
D. Trading Securities At/Around the Same Time as Clients' Securities	15
Item 12: Brokerage Practices	15

A.	Factors Used to Select Custodians and/or Broker/Dealers.....	15
1.	Research and Other Soft-Dollar Benefits.....	15
2.	Brokerage for Client Referrals	16
3.	Clients Directing Which Broker/Dealer/Custodian to Use.....	16
B.	Aggregating (Block) Trading for Multiple Client Accounts	16
Item 13:	Reviews of Accounts.....	16
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	16
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	17
C.	Content and Frequency of Regular Reports Provided to Clients.....	17
Item 14:	Client Referrals and Other Compensation.....	17
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	17
B.	Compensation to Non-Advisory Personnel for Client Referrals.....	17
Item 15:	Custody.....	17
Item 16:	Investment Discretion.....	17
Item 17:	Voting Client Securities (Proxy Voting)	18
Item 18:	Financial Information.....	18
A.	Balance Sheet	18
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	18
C.	Bankruptcy Petitions in Previous Ten Years	18
Item 19:	Requirements For State Registered Advisers	18
A.	Principal Executive Officers and Management Persons; Their Formal Education and Business Background	18
B.	Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)	19
C.	How Performance-based Fees are Calculated and Degree of Risk to Clients	19
D.	Material Disciplinary Disclosures for Management Persons of this Firm	19
E.	Material Relationships That Management Persons Have With Issuers of Securities (If Any).....	19

Item 4: Advisory Business

A. Description of the Advisory Firm

Coroebus Wealth Management, LLC (hereinafter “CWM”) is a Limited Liability Company/Corporation organized in the State of New Jersey. The firm was formed in 2013, and the principal owner is Taraje Williams-Murray.

B. Types of Advisory Services

Coroebus Wealth Management is a registered investment advisory firm built on the multi-family office model delivering a behavioral approach to strategic financial planning with a focus on wealth creation, preservation and social responsibility. We maintain a fiduciary responsibility and treat our clients as our partners. We do not take custody of client’s assets.

CWM offers the following services to advisory clients:

Portfolio Management Services

CWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CWM creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client’s specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of CWM’s economic, investment or other financial interests. To meet its fiduciary obligations, CWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, CWM’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is CWM’s policy to allocate

investment opportunities and transactions it identifies as being appropriate and prudent that might have a limited supply, among its clients on a fair and equitable basis over time.

Selection of Other Advisers

CWM may direct clients to third-party investment advisers. Before selecting other advisers for clients, CWM will always ensure those other advisers are properly licensed or registered as investment adviser.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. We deliver strategic financial planning, preparing individuals and businesses for the large liquidity events in their lifetimes. We focus on interest expense management, asset allocation/cash management, and educating the client on basic financial concepts and tactics.

Services Limited to Specific Types of Investments

CWM generally limits its investment advice to mutual funds, equities, fixed income securities, ETFs (including ETFs in the gold and precious metal sectors), real estate funds (including REITs) and non-U.S. securities. CWM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CWM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by CWM on behalf of the client. CWM may use "model portfolios" together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. If our clients have and social, philanthropic or political needs/wants regarding investment selection, or special circumstances regarding family structure and estate planning CWM will tailor its advice to each individuals unique set of lifestyle needs. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CWM from properly servicing the client account, or if the restrictions would require CWM to deviate from its standard suite of services, CWM reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. CWM does not participate in any wrap fee programs.

E. Assets Under Management

CWM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$5,888,345.53	\$0	9/2023

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Services Fees

Total Assets Under Management	Annual Fee
All account sizes	0.74%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

CWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Selection of Other Advisers Fees

CWM may direct clients to third-party investment advisers. CWM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between CWM and each third-party adviser. The fees shared will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

CWM may specifically direct clients to Morgan Stanley Private Wealth Management. The annual fee schedule is as follows:

Total Assets Under Management	CWM's Fee	Third Party's Fee	Total Fee
Up to 10,000,000	60%	40%	1.00%

Financial Planning Fees

Fixed Fees

The rate for creating client financial plans is between \$5,000 and \$15,000. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement.

Termination of Agreement

Clients may terminate the agreement without penalty, for full refund of CWM's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with thirty days' written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization or may be invoiced and billed directly to the client; clients may select the method in which they are billed. Fees are paid quarterly.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor. These fees are payable quarterly in advance and not negotiable.

Payment of Financial Planning Fees

Fixed Financial Planning fees are paid via check or bank transfer.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CWM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

CWM collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee by 365.)

Fixed financial planning fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation For the Sale of Securities to Clients

Neither CWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

CWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

CWM generally provides advisory services to the following types of clients:

- ❖ Ultra High/High Net Worth Individuals
- ❖ Family Offices
- ❖ Business Entities

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CWM's methods of analysis include fundamental analysis, technical analysis, and cyclical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

CWM uses long term trading, short term trading, short-term purchases, margin transactions, and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

Investment Strategies

CWM's use of short term trading, margin transactions, and options trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Long term investing is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation, in addition to the long term investment risks listed above. Frequent trading, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options writing or trading involves a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value and the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

CWM's use of margin transactions, and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Exchange Traded Funds (ETFs): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) may be negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general the fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies.

Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CWM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither CWM nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

CWM may direct clients to third-party investment advisers. CWM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between CWM and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that CWM has an incentive to direct clients to the third-party investment advisers that provide CWM with a larger fee split. CWM will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. CWM will ensure that all recommended advisers are licensed or notice filed in the states in which CWM is recommending them to clients.

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

A. Code of Ethics

CWM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

CWM does not recommend that clients buy or sell any security in which a related person to CWM or CWM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of CWM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. CWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of CWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, CWM will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on CWM's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a Client on terms that are the most favorable to the Client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and CWM may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of CWM. CWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer and/or custodian. CWM is not affiliated with the broker-dealer and/or custodian. The broker-dealer and/or custodian does not supervise CWM, its agents or advisors.

1. Research and Other Soft-Dollar Benefits

CWM receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). CWM may enter into soft-dollar arrangements within (but not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and CWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. CWM benefits by not having to produce or pay for the research, products or services, and CWM will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that CWM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

CWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

CWM may permit Clients to direct it to execute transactions through a specified broker-dealer. If a client selects a brokerage, the client will be required to acknowledge in writing that the Client's direction with respect to the use of brokers supersedes any authority granted to CWM to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If CWM buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, CWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. CWM would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with the Adviser's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts are reviewed at least quarterly only by Taraje Williams-Murray, Chief Executive Officer, with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Taraje Williams-Murray, Chief Executive Officer. There is only one level of review and that is the total review conducted to create the financial plan.

Form ADV 2A Version: 11/14/2023

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly a written report that details the client's account including assets held and asset value, which report will come from the custodian. Financial planning clients will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CWM clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

CWM may enter into written arrangements with third parties to act as solicitors for the Adviser's investment management services. All compensation with respect to the foregoing will be fully disclosed to each Client to the extent required by applicable law.

Item 15: Custody

CWM, with client written authority, has limited custody of client's assets through direct fee deduction of CWM's fees only. If the client chooses to be billed directly by the client's chosen custodian, CWM would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. CWM is not affiliated with the custodian. The custodian does not supervise CWM, its agents or activities.

Item 16: Investment Discretion

CWM provides discretionary and non-discretionary, investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, CWM generally manages

the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, the price per share. In some instances, CWM's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to CWM).

Item 17: Voting Client Securities (Proxy Voting)

CWM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

CWM neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CWM nor its management has any financial condition that is likely to reasonably impair its ability to meet contractual commitments to clients. CWM is a recipient of funds under the CARES Act Paycheck Protection Program and the SBA Economic Injury Disaster Loan during the COVID-19 pandemic..

C. Bankruptcy Petitions in Previous Ten Years

CWM has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business background Taraje Williams-Murray, CWM's current management person/executive officer, can be found on the Form ADV Part 2B brochure supplement for such individual.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. How Performance-based Fees are Calculated and Degree of Risk to Clients

CWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at CWM or CWM has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither CWM, nor its management persons, has any relationship or arrangement with issuers of securities.