

**Brochure  
Form ADV Part 2A**

**Item 1 - Cover Page**

**Calamita Wealth Management, Inc.**

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(704) 276-7325

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CRD# 153316

**May 22, 2017**

This Brochure provides information about the qualifications and business practices of Calamita Wealth Management, Inc., which also conducts business under the name of Chiropractic Wealth Management. This Brochure has been prepared for clients interested in the services provided under the name Calamita Wealth Management, Inc. We have a separate Brochure to describe the services provided under the name Chiropractic Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (704)276-7325 or [todd@calamitawealth.com](mailto:todd@calamitawealth.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. Our Brochure is also available on our web site [www.calamitawealth.com](http://www.calamitawealth.com).

Calamita Wealth Management, Inc. is a registered investment adviser. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of Calamita Wealth Management, Inc. provide you with information about which you determine to hire or retain Calamita Wealth Management, Inc. Additional information about Calamita Wealth Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 – Material Changes**

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include the annual provision of a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, clients will be notified of the change(s) within thirty (30) days. In addition, the Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on February 1, 2017. Of course the complete Brochure is available to clients at any time upon request.

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## Item 4 – Advisory Business

Calamita Wealth Management, Inc. (“CWM”) was formed in 2010 and provides financial planning and investment management services to its clients. The Registrant also conducts business under the name of Chiropractic Wealth Management which offers accounting and advisory services specific to the Chiropractic industry. We have prepared a separate Brochure describing these services provided under the name Chiropractic Wealth Management.

Todd Calamita is the sole principal owner of CWM. Please see *Brochure Supplement*, Exhibit A, for more information on Mr. Calamita.

The services provided by CWM’s are separated into two components: the **Discretionary Investment Management** of a client’s investment portfolio; and **Comprehensive Financial Planning** which includes but may not be limited to cash flow & budgeting, debt reduction, insurance and risk management needs analysis, retirement goal setting, wealth transfer strategies and tax planning.

As of December 31, 2016, CWM managed \$55,261,608 on a discretionary basis, and no assets on a non-discretionary basis.

The **Calamita Wealth Management, Inc.** process is as follows:

### Establish the Relationship

The Investment Management and Financial Planning relationship begins with the "establishment" phase. Establishing the roles and expectations of both CWM and the client is a critical initial step to a long lasting and trusted relationship. We further clarify such important issues as fee structure, communication preferences and other often overlooked factors that are important to laying the foundation.

### Gather the Information

In order to properly evaluate each prospective client at CWM we must learn as much as possible to truly "know" our client. Determining your current financial status, personal and financial goals, needs and priorities, and all other pertinent information forms the backbone of your financial direction, strategy and plan.

### Analyze

We take all of the information you give us and analyze the most appropriate steps necessary to reach your financial goals. We look at debt ratios, asset levels, investment allocations, risk tolerance levels, insurance, estate planning information and your other financial data necessary to form a comprehensive plan.

### Develop and Recommend

Once we have completed our analysis, we develop and recommend the necessary action steps to help you meet your specified goals. We take the time to help you understand the steps so that you can make informed decisions. We also listen to your concerns and revise recommendations as appropriate.

### Implement

Once we have agreed upon the necessary steps to meeting your financial goals, the implementation phase begins. The implementation phase will consist of a list of action steps required of you, the client, as well as CWM. During this step we will clarify responsibilities and select the products and/or services needed for implementation. To implement your investment portfolio, CWM will manage your assets on a discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct the portfolio without prior consultation with you.

### Monitor

Once we have established our planning relationship, gathered the necessary information, analyzed that information, developed a plan, and implemented your financial plan, the monitoring phase begins. We have found that the monitoring of your financial plan can often be the most critical step to successful financial planning. It involves a multitude of factors such as the timely communication of the frequent changes that occur in each client's life, the changing of goals and objectives, the investment allocation adjustments needed due to income changes, unique tax situations and evolving risk tolerance levels, as well as market and tax law changes. We find that the monitoring stage of the financial planning proves often the most time consuming and most important function in the success of your financial goals.

### Retirement Plan Advisory Services

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. CWM will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 (“ERISA”) sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, CWM will be considered a fiduciary under ERISA. For example, CWM will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain CWM to act as an investment manager within the meaning of ERISA § 3(38), CWM will provide discretionary investment management services to the Plan. With respect to any account for which CWM meets

the definition of a fiduciary under Department Of Labor rules, CWM acknowledges that both CWM and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between CWM and Client.

#### Fiduciary Consulting Services

- *Investment Selection Services*  
CWM will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- *Non-Discretionary Investment Advice*  
CWM provides Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.
- *Investment Monitoring*  
CWM will assist in monitoring the plan's investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and CWM will make recommendations to maintain or remove and replace investment options. The details of this aspect of service will be enumerated in the engagement agreement between the parties.

#### Non-Fiduciary Services

- *Participant Education*  
CWM will provide education services to Plan Participants about general investment principles and the investment alternatives available under the Plan. Education presentations will not take into account the individual circumstances of each Plan Participant and individual recommendations will not be provided unless a Plan Participant separately engages CWM for such services. Plan Participants are responsible for implementing transactions in their own accounts.
- *Participant Enrollment*  
CWM will assist with group enrollment meetings designed to increase retirement Plan participation among employees and investment and financial understanding by the employees.

### **Item 5 – Fees and Compensation**

#### General Fee Information

Fees paid to CWM are exclusive of and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally

including a management fee and fund expenses, as described in each fund’s prospectus or offering materials).

Investment Management fees will be calculated quarterly, based on the market value of the account at the end of the previous quarter. Fees are generally payable quarterly, in advance or arrears, as agreed upon with each client, and are charged as follows:

<b>Assets Under Management</b>	<b>Annual Advisory Fee</b>
Up to \$250,000	1.25% (0.31% per quarter)
\$250,001 to \$3,000,000	1.00% (0.25% per quarter)
\$3,000,001 to \$5,000,000	0.80% (0.20% per quarter)
\$5,000,001 to \$10,000,000	0.70% (0.175% per quarter)
Over \$10,000,000	0.60% (0.15% per quarter)

Unless the client requests direct billing, advisory fees will be automatically deducted from the investment account in advance. Fees will be prorated for capital contributions and withdrawals of \$15,000 or more made during the applicable calendar quarter. Accounts initiated during a calendar quarter will be charged a prorated fee.

The minimum quarterly fee for any account is \$2,500. CWM may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where CWM deems it appropriate under the circumstances.

Clients may terminate without penalty within five days of execution of the advisory contract. Otherwise, clients may terminate their account at any time, in which case fees will be prorated up to and including the termination date which is evidenced by receipt of written instructions from the client. If the daily proration results in an amount to be rebated to the client, the client will be promptly refunded.

Comprehensive Financial Planning fees are typically \$5,000 to \$15,000 for a written financial plan, depending upon the complexity of the client’s financial circumstances. For planning projects of limited scope, CWM may impose an hourly fee of \$250. The total amount of fees will be invoiced to the client and are due upon satisfactory completion of the financial plan or project.

Client may terminate the financial planning arrangement within five days of the date of execution of the financial planning agreement without penalty. Thereafter, the client will incur a pro rata charge for bona fide planning services actually rendered prior to termination.

In certain instances, CWM may make exceptions to the above fees pursuant to a negotiated agreement with the client.

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

CWM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). “Side-by-Side Management” refers to a situation in

which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because CWM has no performance-based fee accounts, it has no side-by-side management.

## **Item 7 – Types of Clients**

CWM provides investment management and financial planning services to individuals, high net worth individuals, pension and profit sharing plans, and businesses. CWM does not generally impose a minimum portfolio value for conventional investment advisory services, but does impose a minimum quarterly fee of \$2,500 (\$10,000 annually).

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

### Methods of Analysis and Investment Strategies

CWM uses a combination of qualitative and quantitative research techniques to evaluate investments and manage portfolios. Typical sources of information include financial newspapers and magazines, research materials prepared by others, mutual fund rating services, financial news, financial data providers, analyst research reports, annual reports and prospectuses. CWM continually adapts its investment strategies to market conditions and individual client needs. The investment strategies used to implement any investment advice given to clients include long term purchases (securities held at least a year) and short term purchases (securities sold within a year).

### Risk of Loss

While CWM seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money. Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While CWM manages client investment portfolios based on CWM's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that CWM allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that CWM's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, CWM may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in

managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Equity Market Risks.* CWM may invest portions of client assets directly into equity investments, such as individual stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* CWM may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* CWM may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

## **Item 9 – Disciplinary Information**

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CWM or the integrity of CWM's management. CWM has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Mr. Calamita has his life, health, and long-term care insurance licenses for educational purposes only, to best advise clients on their insurance needs. He does not sell insurance nor receive any commissions for selling insurance products.

## **Item 11 – Code of Ethics**

CWM has adopted a Code of Ethics describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

CWM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which CWM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which CWM or an associated person has a position of interest. All persons associated with CWM are required to follow CWM's Code of Ethics. Subject to satisfying this policy and applicable laws, CWM may trade for his own account in securities which are recommended to and/or purchased for CWM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of CWM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, investing for his own accounts. CWM's clients or prospective clients may request a copy of the firm's Code of Ethics.

## **Item 12 – Brokerage Practices**

### Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, CWM seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, CWM may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of CWM's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

CWM recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients' assets. CWM may also effect trades for client accounts at Schwab, or may in some instances, consistent with CWM's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although CWM may recommend that clients establish accounts at Schwab, it is ultimately the client's decision to custody assets with Schwab. CWM is independently owned and operated and is not affiliated with Schwab.

Schwab Advisor Services provides CWM with access to its institutional trading, custody, reporting and related services, which are typically not available to Schwab retail investors. Schwab also makes available various support services. Some of those services help CWM manage or administer our clients' accounts while others help CWM manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform

offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For CWM client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to CWM other products and services that benefit CWM but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of CWM accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist CWM in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of CWM's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help CWM manage and further develop its business enterprise. These services may include: (i) technology, compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to CWM. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CWM. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of CWM personnel. In evaluating whether to recommend that clients custody their assets at Schwab, CWM may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

#### Directed Brokerage

CWM does not generally allow directed brokerage accounts.

#### Aggregated Trade Policy

CWM typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, CWM may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, CWM will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by CWM or its officers, directors, or employees will be excluded first.

### **Item 13 – Review of Accounts**

CWM monitors most positions in a client's accounts on a weekly basis and utilizes software to track the specific asset allocation of client's investment accounts. This allocation is also monitored against the client's current risk tolerance as well as current and future goals.

All accounts are reviewed with each client on at least an annual basis to ensure that the client is informed of the allocation and standing of their account and that the allocation is still appropriate for their specific goals. More frequent account reviews are triggered by such factors as: a) awareness of a material change in a client's circumstances or investment objectives, b) significant changes in market conditions, c) changes in the investment advisor's assessment of a security held in an account and d) divergence of an account's investment performance from management's expectations.

In addition to the account statements sent to clients by the custodian of their accounts, all clients receive a quarterly account summary from CWM.

### **Item 14 – Client Referrals and Other Compensation**

CWM does not accept monetary payment for client referrals. CWM does have relationships with other service professionals such as attorneys and CPA's that may refer their clients to CWM. CWM may also refer clients to these service professionals from time to time. CWM will typically provide the client with multiple names when referring business to other service professionals.

### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. CWM urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

CWM typically receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts and timing of trades, CWM observes the investment policies, limitations and restrictions established for and by each client.

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, CWM does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. CWM may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about CWM's financial condition. CWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. Also, CWM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

### **Item 19 – Requirements for State-Registered Advisers**

Mr. Calamita is the President and Chief Compliance Officer of CWM. His background information is provided elsewhere in this Form ADV (please see *Brochure Supplement*). No other disclosure is required under this item.

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Todd D. Calamita**

**CRD# 3204341**

**of**

**Calamita Wealth Management, Inc.**

6135 Park South Drive  
Charlotte, North Carolina 28210

(704) 276-7325

[www.calamitawealth.com](http://www.calamitawealth.com)

May 22, 2017

This Brochure Supplement provides information about Todd Calamita, and supplements the Calamita Wealth Management, Inc. ("CWM") Brochure. You should have received a copy of that Brochure. Please contact us at (704) 276-7325 if you did not receive CWM's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Todd is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Todd D. Calamita (year of birth 1971) is President of CWM and also serves as the firm's Chief Compliance Officer. Todd began his career in corporate banking as a Certified Cash Management Sales Officer, helping small and mid-size business more efficiently manage their cash flow. Todd later focused his career on helping individuals and families set and reach their financial goals. From 1999 to 2005, he worked as Financial Advisor at Wachovia Securities. Then, from 2005 to 2010, he worked as a Financial Advisor at RBC Wealth Management. In 2010, Todd founded Calamita Wealth Management, Inc.

Todd received a Bachelor of Business Administration in 1993 from Ohio University and his Master of Business Administration in 1997 from the Weatherhead School of Management at Case Western Reserve University in Cleveland, Ohio. He earned his CERTIFIED FINANCIAL PLANNER™ certification\* in 2005.

Todd has been featured in the Financial Bootcamp series on WCNC-TV, Charlotte's News Channel 36. The show pairs a financial consultant with an individual or family seeking professional help in getting their household finances in order. Todd has also been a guest columnist for the *Charlotte Weekly* newspaper, writing about the financial challenges that we face on a day-to-day basis. Mr. Calamita has also been frequently quoted in *The Charlotte Observer*.

Todd is an active member of the Ohio University Alumni Association. He has also held Past President positions for both the Ohio University Alumni Association Charlotte Chapter and the College of Business Society of Alumni and Friends. He is also a past member of the Ohio University Alumni Association Board of Directors, and a past Regional Chair of the Ohio University Capital Campaign.

\* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Todd has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Todd is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Todd has no other income or compensation to disclose.

### ***Item 6 - Supervision***

As President and Chief Compliance Officer of CWM, Todd supervises all duties and activities of the firm, and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.

### ***Item 7 - State Requirements for State-Registered Advisers***

In addition to Item 3 above, state-registered advisers are required to disclose all material facts regarding any event in which a supervised person of the firm was found liable in certain legal proceedings, or was the subject of a bankruptcy petition. Todd has no event to disclose with respect to this item.