



Form ADV Part 2A – Disclosure Brochure

Effective: March 7, 2019

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Cadence Wealth Management LLC (“Cadence”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Cadence is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Cadence to assist you in determining whether to retain the Advisor.

Additional information about Cadence and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 155080.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about the Advisory Persons of Cadence. For convenience, we have combined these documents into a single disclosure document.

Cadence believes that communication and transparency are the foundation of its relationship and continually strive to provide you with the complete and accurate information at all times. Cadence encourages all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been no material changes to our Disclosure Brochure since the last time we delivered this brochure to Clients.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Cadence.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 155080. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (508) 898-0400 or by email at info@cadencewm.com.

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Item 4 – Advisory Services

A. Firm Information

Cadence Wealth Management LLC (“Cadence” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). Cadence is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Massachusetts. Cadence was founded in 2010 and is owned and operated by Casey D. Clarke (Managing Member) and Thomas G. Shiffer (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Cadence.

Our goal at Cadence is to help our Clients grow their wealth over time regardless of the market environment. As a firm that also believes in the importance of goal-based financial planning in connection with investment management, we feel strongly about being able to offer Clients of all levels of net worth a dynamic investment solution that can help them excel.

B. Advisory Services Offered

Cadence offers investment advisory services to individuals, high net worth individuals, families, trusts, and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Cadence provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Cadence works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Cadence will then construct a portfolio, consisting of exchange-traded funds (“ETFs”), mutual funds, and individual stocks and bonds to achieve the Client’s investment goals. The Advisor may also utilize other security types as necessary to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

At Cadence, our investment philosophy is based on the belief that markets are efficient over the long-term, but can remain relatively inefficient and irrational over the shorter term. At the core of our investment management approach is a tactically managed Asset Allocation strategy that seeks to capture market inefficiencies in various asset classes over time while maintaining a below-market risk posture. This provides Clients with a longer-term core solution which is aligned with our belief that markets are efficient and rational over longer periods of time. However, in aligning with our belief that markets can operate away from the fundamentals over the shorter term, Cadence manages a number of technically based strategies that are designed to capitalize on trends that we see developing in various markets/asset classes. The goal of these strategies is to limit losses in unfavorable market environments while attempting to outperform the broad market over longer periods of time. The firm employs technical analysis and proprietary rule-based modeling in managing these accounts (See Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss for details on analysis methods).

Cadence will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed upon with the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor. Cadence may periodically rebalance or adjust client accounts under its management. If the client experiences any significant changes to his/her financial or personal circumstances, the Client must notify the Firm so that the Firm can consider such information in managing the Client's investments.

Cadence evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. Cadence may recommend, on occasion, redistributing investment allocations to

diversify the portfolio. Cadence may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Cadence may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Cadence accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement, please see Item 12 – Brokerage Practices.

Use of Independent Managers

Cadence may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portfolio of a Client's investment portfolio. In such instances, the Client will then enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. Cadence may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. Cadence will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] as part of its ongoing investment supervisory services. The Client, prior to entering into an agreement with unaffiliated money manager[s] or investment advisor[s], will be provided with the advisor's Form ADV 2A (or a brochure that makes the appropriate disclosures).

Financial Planning and Consulting Services

Cadence will typically provide a variety of financial planning services to individuals, families, small businesses and other Clients, pursuant to a written financial planning or consulting agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Cadence and the Client will discuss and agree upon the specific topics to be covered by the financial plan. Such topics may include investment planning, retirement planning, tax planning, insurance planning, estate planning, or business planning. Cadence will conduct one or more meetings (in person if possible, otherwise via telephone conference) with the Client in order to understand the Client's current financial situation, financial goals, specific issues or questions, and topics to be covered by the financial plan.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Cadence may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging Cadence to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Statement – Cadence, in connection with the Client, will develop an investment strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Cadence will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Cadence will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Cadence will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

Cadence does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Cadence.

E. Assets Under Management

As of December 31, 2018, Cadence manages approximately the following assets:

Discretionary Assets	\$137,400,000
Non-Discretionary Assets	\$23,400,000
Total Assets Under Management	\$160,800,000

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. The period commences with the effective date of the investment advisory agreement and continues on a pro-rata basis through the first month. The quarterly period includes this partial month and the next two months. Investment advisory fees are based on the market value of assets under management at the end of the prior period. Investment advisory fees range from 1.00% to 2.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first or last quarter of service is prorated to the inception date of the account[s] to the end of the quarterly period. Cadence will pro rate fees for accounts where the investment management agreement is initiated or terminated on a date creating less than a full quarter of investment management for either the initial or final month of the Agreement. Any fees not earned may be refunded to the Client. Cadence reserves the right not to pro rate its fees. Fees may be negotiable at the sole discretion of the Advisor, and the Advisor may charge a lesser fee based upon criteria, such as, but not limited to, anticipated future earning capacity, anticipated future assets to be managed, related accounts, account composition, and other factors. The Client’s fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Cadence will be independently valued by the Custodian. Cadence will not have the authority or responsibility to value portfolio securities.

The Advisor’s fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

For Clients that have accounts managed by an Independent Manager, the Independent Manager's fee will typically be charged separate from the Cadence fee listed above. The Client's fee will be deducted from the Client's account[s] at the Custodian. Please see Item 14 – Client Referrals and Other Compensation for additional details.

Financial Planning and Consulting Services

Cadence offers financial planning or consulting services on an annual basis ranging from \$600 to \$5,000, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or total costs will be determined prior to establishing the advisory relationship. The Advisor's financial planning fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. Fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Cadence at the end of the prior quarterly period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Cadence directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

Clients referred to Independent Managers will be billed in accordance to the investment management agreement with each manager.

Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon execution of the of the financial planning and consulting agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Cadence, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by Cadence are separate and distinct from these custody and execution fees.

In addition, all fees paid to Cadence for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Cadence, but would not receive the services provided by Cadence which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Cadence to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

Cadence is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement by providing thirty (30) days advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a Client should wish to terminate their relationship with an Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Cadence will assist the Client with the termination and transition as appropriate.

Financial Planning and Consulting Services

Cadence is typically compensated for its financial planning and consulting services in advance of the engagement deliverable[s]. Either party may terminate a financial planning and consulting agreement, at any time, by providing written notice to the other party. The Client may also terminate the financial planning and consulting agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Client's financial planning and consulting agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Clients can engage Cadence to render securities brokerage services under a separate commission-based arrangement. Clients are under no obligation to engage Cadence and may choose brokers or agents not affiliated with Cadence.

Broker-Dealer Affiliation

Certain Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, an Advisory Person may implement securities transactions under and not through Cadence. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative Please see Item 10.

A conflict of interest exists to the extent that Cadence recommends the purchase of securities where Cadence may receive commissions or other additional compensation as a result of the recommendations. Cadence has procedures in place to ensure that any recommendations made by Cadence are in the best interest of clients.

Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by an Advisory

Person are separate and in addition to Cadence's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through an Advisory Person.

Item 6 – Performance-Based Fees

Cadence does not charge performance-based fees for its investment advisory services. The fees charged by Cadence are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. Cadence does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Cadence provides investment advisory services to individuals, high net worth individuals, families, trusts, and estates. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Cadence generally requires a minimum relationship size of \$250,000 to effectively implement its investment process.

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

A. Methods of Analysis

Cadence employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Cadence is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Cadence will be able to accurately predict such a reoccurrence.

As noted above, Cadence generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Cadence will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Cadence may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Cadence will assist Clients in determining an appropriate

strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Cadence may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. Cadence may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Following are some additional risks associated with Options, Margin and Short-Sale transactions:

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to

a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Cadence or any of its Supervised Persons. Cadence and its Supervised Persons value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 155080.

Item 10 – Other Financial Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5.E, certain Advisory Persons of the Advisor are also registered representative of PKS. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

As noted in Item 5 – Fees and Compensation, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with the Advisor. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. An Advisory Person is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

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

A. Code of Ethics

Cadence has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Cadence (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Cadence and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Cadence Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (508) 898-0400 or via email at info@cadencewm.com.

B. Personal Trading with Material Interest

Cadence allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Cadence does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Cadence does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Cadence allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Cadence may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Cadence requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Cadence allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Cadence, or any Supervised Person of Cadence, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Cadence does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Cadence to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Cadence does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Cadence does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Cadence. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Cadence may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. Cadence will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Cadence maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Cadence does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - Cadence does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Cadence will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Cadence will not be obligated to

select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

Transactions for Clients will generally be combined or “batched” to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Advisor’s Clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among the Advisor’s Clients pro rata to the purchase and sale orders placed for each Client on any given day. To the extent that the Advisor determines to aggregate Client orders for the purchase or sale of securities, including securities in which Cadence’s Supervised Persons may invest, the Advisor generally does so in accordance with applicable rules promulgated under the Investment Advisers Act of 1940 and no-action guidance provided by the staff of the SEC. Cadence does not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Advisor determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account[s] with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Advisor may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Clarke and/or Mr. Shiffer, Managing Members of Cadence. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. All Clients are encouraged to discuss their needs, goals, and objectives with Cadence and to keep Cadence informed of any changes thereto. Cadence contacts ongoing advisory Clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the Client’s financial situation and/or investment objectives.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify Cadence if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Cadence

Participation in Institutional Advisor Platform

Cadence has established an institutional relationship with Schwab through its “Schwab Advisor Services” unit, a division of Schwab dedicated to serving independent advisory firms like Cadence. As a registered investment advisor participating on the Schwab Advisor Services platform, Cadence receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and financial support to (Advisor Short Name) that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. (Advisor Short Name) believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Client Referrals from Solicitors

Cadence does not engage paid solicitors for Client referrals.

Item 15 – Custody

Cadence does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct Cadence to utilize the Custodian for the Client's security transactions. Cadence encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

Cadence generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Cadence. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Cadence will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Cadence does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Cadence, nor its management has any adverse financial situations that would reasonably impair the ability of Cadence to meet all obligations to its Clients. Neither Cadence, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Cadence is not required to deliver a balance sheet along with this Disclosure Brochure, as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance.



Form ADV Part 2B – Brochure Supplement

for

**Casey D. Clarke, CFP[®], ChFC[®], CRPC[®], AWMA[®]
Managing Member**

Effective: March 7, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Casey D. Clarke (CRD# **2911372**) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) (CRD # 155080) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any have questions about the contents of this Brochure Supplement or Cadence’s Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Mr. Clarke is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2911372.

Item 2 – Educational Background and Business Experience

Casey D. Clarke, born in 1976, is dedicated to advising Clients of Cadence as a Managing Member. Mr. Clarke earned a Bachelor's of Science in Business Administration from Bryant University in 1998. Additional information regarding Mr. Clarke's employment history is included below.

Employment History:

Managing Member, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments	10/2010 to 09/2012
Financial Advisor, Ameriprise Financial Services, Inc.	04/1998 to 10/2010

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) 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 71,000 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 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.

Chartered Retirement Planning Counselor (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models

and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Accredited Wealth Management Advisor® AWMA®

Individuals who hold the AWMA® designation have completed a course of study encompassing wealth strategies, equity-based compensation plans, tax reduction alternatives, and asset protection alternatives. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Clarke. Mr. Clarke has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Clarke.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Clarke.***

However, we do encourage you to independently view the background of Mr. Clarke on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2911372.

Item 4 – Other Business Activities

Mr. Clarke does not have any additional business activities to disclose.

Item 5 – Additional Compensation

Mr. Clarke does not have any additional compensation to disclose.

Item 6 – Supervision

Mr. Clarke serves as a Managing Member of Cadence and is also supervised by Thomas Shiffer, the Chief Compliance Officer. Mr. Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its Supervised Persons. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is

required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Thomas G. Shiffer, CFP®, CFS®, CRPC®
Managing Member and Chief Compliance Officer**

Effective: March 7, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Thomas G. Shiffer (CRD# **4471246**) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Cadence’s Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Mr. Shiffer is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4471246.

Item 2 – Educational Background and Business Experience

Thomas G. Shiffer, born in 1964, is dedicated to advising Clients of Cadence as a Managing Member and the Chief Compliance Officer. Mr. Shiffer earned a Bachelor's Degree from The Pennsylvania State University in 1987. Additional information regarding Mr. Shiffer's employment history is included below.

Employment History:

Managing Member and Chief Compliance Officer, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2010 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	10/2001 to 10/2010
Financial Advisor, IDS Life Insurance Company	10/2001 to 10/2010

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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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 71,000 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 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.

Certified Fund Specialist® (“CFS®”)

Individuals who hold the CFS® designation have completed a course of study across six modules to develop a strong working knowledge of:

- mutual funds, ETF, and REITs
- closed-end funds and similar investments
- advanced fund analysis and selection
- asset allocation and portfolio construction

To receive the designation the candidate must meet the following requirements: 1) either a bachelor's degree or 2,000 hours of financial services work experience, 2) pass three exams and complete a case study, and 3) complete 30 hours of continuing education every two years.

Chartered Retirement Planning Counselor (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Thomas Shiffer. Thomas Shiffer has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Shiffer. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Shiffer.***

However, we do encourage you to independently view the background of Mr. Shiffer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4471246.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Shiffer is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD No.35747), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Shiffer will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Shiffer. Neither the Advisor nor Mr. Shiffer will also earn investment advisory fees in connection with any services implemented in Mr. Shiffer’s separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Shiffer also serves as sales agent for various insurance companies. This activity is done separate and apart from his role with the Cadence. As an insurance agent, Mr. Shiffer may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending

certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Shiffer or the Advisor.

Item 5 – Additional Compensation

Mr. Shiffer has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Thomas Shiffer serves as a Managing Member and the Chief Compliance Officer of Cadence. Mr. Shiffer can be reached at (508) 898-0400. Cadence has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its Supervised Persons. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

Nicholas R. Kraszyk, CFP[®], CRPC[®], ChFC[®], ADPA[®]

Investment Advisor Representative

Effective: March 7, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Nicholas R. Kraszyk (CRD# **5010874**) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or Cadence’s Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Mr. Kraszyk is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5010874.

Item 2 – Educational Background and Business Experience

Nicholas R. Kraszyk, born in 1981, serves as an Investment Advisor Representative of Cadence. Mr. Kraszyk earned a Bachelor of Science degree from Fitchburg State College. Additional information regarding Mr. Kraszyk's employment history is included below.

Employment History:

Investment Advisor Representative, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2010 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	08/2005 to 10/2010

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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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 71,000 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 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.

Chartered Retirement Planning Counselor (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models

and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Accredited Domestic Partnership AdvisorsSM (ADPA®)

Individuals who hold the ADPA® designation have completed a course of study encompassing wealth transfers, federal taxation, retirement planning, and planning for financial and medical end-of-life needs for domestic partners. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Kraszyk. Mr. Kraszyk has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kraszyk. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kraszyk.***

However, we do encourage you to independently view the background of Mr. Kraszyk on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5010874.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Kraszyk is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 5010874), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Kraszyk will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Kraszyk. Neither the Advisor nor Mr. Kraszyk will earn investment advisory fees in connection with any services implemented in Mr. Kraszyk's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Mr. Kraszyk also serves as sales agent for various insurance companies. This activity is done separate and apart from his role with the Cadence. As an insurance agent, Mr. Kraszyk may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kraszyk or the Advisor.

Personal Training

Mr. Kraszyk is also a personal trainer located in Lancaster, MA in his own capacity. As a personal trainer, Mr. Kraszyk receives compensation for training individuals on proper form with weightlifting, some gymnastics movements, and proper mobility to be able to conduct physical activity better. Mr. Kraszyk spends up to 4 hours a month during non-trading hours in this capacity.

Commercial Fishing

Mr. Kraszyk also does commercial fishing. If a legal fish is caught during the open season, Mr. Kraszyk is able to sell the fish to a qualified buyer at the market price. Mr. Kraszyk spends approximately 15 hours per month during non-trading hours in this capacity.

Item 5 – Additional Compensation

Mr. Kraszyk has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Kraszyk serves as an Investment Advisor Representative of Cadence and is supervised by Thomas Shiffer, the Chief Compliance Officer. Thomas Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its Supervised Persons. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**James A. Laite
Investment Advisor Representative**

Effective: March 7, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James A. Laite (CRD# **4656586**) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”, CRD# 155080) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cadence Disclosure Brochure or this Brochure Supplement, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Mr. Laite is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4656586.

Item 2 – Educational Background and Business Experience

James A. Laite, born in 1963, serves as an Investment Advisor Representative of Cadence Wealth Management LLC. Additional information regarding Mr. Laite's employment history is included below.

Employment History:

Investment Advisor Representative, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments	10/2010 to 09/2012
Financial Advisor, Ameriprise Financial Services, Inc.	04/2003 to 10/2010
Financial Advisor, IDS Life Insurance	04/2003 to 10/2010
Patriot Chimney Services	04/1994 to 08/2003

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Laite. Mr. Laite has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Laite.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Laite.***

However, we do encourage you to independently view the background of Mr. Laite on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4656586.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Laite is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart Mr. Laite's role with Cadence. As an insurance professional, Mr. Laite may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Laite is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Laite or the Advisor.

Member of Board of Public Works

Mr. Laite is also a member of board of public works in the town of Lancaster. He contributes in decision and policy making for the highway department, tree and cemetery department. He approximately spends 4 hours per month for this activity.

Ski Patrolling

Mr. Laite also a Ranger in Wachusett Mountain Ski Area located at 499 Mountain Road Princeton, MA 01541, US. This is non-investment related activity and he approximately spends 32 hours per month on this activity. Mr. Laite monitors the trails as a Volunteer Ski Patroller. However, he receives season pass in exchange of this activity.

Item 5 – Additional Compensation

Mr. Laite has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Laite serves as an Investment Advisor Representative of Cadence and is supervised by Tom Shiffer, the Chief Compliance Officer. Tom Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its Supervised Persons. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Steven J. DeBoth, CFP®, CRPC®
Investment Advisor Representative**

Effective: March 7, 2019

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Steven J. DeBoth (CRD# **4459388**) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) (CRD # 155080) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Cadence Disclosure Brochure or this Brochure Supplement, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Mr. DeBoth is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Steven J. DeBoth, born in 1970, serves as an Investment Advisor Representative of Cadence. Mr. DeBoth earned a Bachelor of Science in Accounting, International Business, Spanish, Economics from Marquette University in 1993. Additional information regarding Mr. DeBoth's employment history is included below.

Employment History:

Investment Advisor Representative, Cadence Wealth Management LLC	10/2011 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2011 to 02/2013
Financial Advisor, American Express Financial Advisors	09/2001 to 10/2011
Financial Advisor, IDS Life Insurance Company	09/2001 to 10/2011

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) 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 71,000 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 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.

Chartered Retirement Planning Counselor ("CRPC®")

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. DeBoth. Mr. DeBoth has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. DeBoth. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. DeBoth.*** However, we do encourage you to independently view the background of Mr. DeBoth on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **4459388** in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. DeBoth also serves as a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. DeBoth's role with Cadence. As an insurance professional, Mr. DeBoth will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. DeBoth is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning regular advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. DeBoth or the Advisor.

Item 5 – Additional Compensation

Mr. DeBoth has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. DeBoth serves as an Investment Advisor Representative of Cadence and is supervised by Tom Shiffer, the Chief Compliance Officer. Mr. Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its employees. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Individual Disclosure Brochure

for

**Grigoriy Grinshteyn, CRPC®
Investment Advisor Representative**

Effective: March 7, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Grigoriy Grinshteyn (CRD# 4965008) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or Cadence’s Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Grigoriy Grinshteyn is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Grigoriy Grinshteyn, born in 1981, serves as an Investment Advisor Representative of Cadence. Mr. Grinshteyn graduated Summa Cum Laude with a Bachelor's degree in Contemporary Russian Politics from Clark University in 2004. Additional information regarding Mr. Grinshteyn's employment history is included below.

Employment History:

Investment Advisor Representative, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2010 to Present
Independent Contractor & Financial Advisor, American Express Financial Advisers	05/2005 to 10/2010
Independent Contractor & Financial Advisor, IDS Life Insurance Company	05/2005 to 10/2010

Chartered Retirement Planning Counselor (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Grigoriy Grinshteyn. Grigoriy Grinshteyn has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Grinshteyn. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Grinshteyn.*** However, we do encourage you to independently view the background of Mr. Grinshteyn on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4965008** in the field labeled “Individual CRD Number”.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Grinshteyn is also a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”). PKS is a registered broker-dealer (CRD No.4965008), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Grinshteyn will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Grinshteyn. Neither the Advisor nor Mr. Grinshteyn will earn investment advisory fees in connection with any services implemented in Mr. Grinshteyn's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Mr. Grinshteyn also serves as a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Grinshteyn's role with Cadence. As an insurance professional, Mr. Grinshteyn will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Grinshteyn is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning regular advisory fees, but will be

excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Grinshteyn or the Advisor.

Item 5 – Additional Compensation

Mr. Grinshteyn has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Grinshteyn serves as an Investment Advisor Representative of Cadence and is supervised by Thomas Shiffer the Chief Compliance Officer. Thomas Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its employees. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Individual Disclosure Brochure

for

**Michael D. Downey, Jr.
Investment Advisor Representative**

Effective: March 7, 2019

This Form ADV2B (“Brochure Supplement”) provides information about the background and qualifications of Michael G. Downey, Jr. (CRD# 5251765) in addition to the information contained in the Cadence Wealth Management LLC (“Cadence” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or Cadence’s Disclosure Brochure, please contact us at (508) 898-0400 or by email at info@cadencewm.com.

Additional information about Michael Downey is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Michael D. Downey, Jr. born in 1971, serves as an Investment Advisor Representative of Cadence. Additional information regarding Mr. Downey's employment history is included below.

Employment History:

Investment Advisor Representative, Cadence Wealth Management LLC	10/2010 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	01/2012 to Present
Financial Advisor, Ameriprise Financial Services, Inc.	05/2005 to 10/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Michael Downey. Michael Downey has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Downey. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Grinshteyn.*** However, we do encourage you to independently view the background of Mr. Downey on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **4965008** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Downey is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 5251765), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Downey will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Downey. Neither the Advisor nor Mr. Downey will earn investment advisory fees in connection with any services implemented in Mr. Downey's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Mr. Downey also serves as a licensed insurance professional. Implementations of insurance recommendation are separate and apart from Mr. Downey's role with Cadence. As an insurance professional, Mr. Downey will typically receive commissions and other related revenues from the various insurance companies whose products are sold. Mr. Downey is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset financial planning regular advisory fees, but will be excluded from asset calculations for investment management services. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Downey or the Advisor.

Item 5 – Additional Compensation

Mr. Downey has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Michael Downey serves as an Investment Advisor Representative of Cadence and is supervised by Thomas Shiffer the Chief Compliance Officer. Thomas Shiffer can be reached at (508) 898-0400.

Cadence has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Cadence. Further, Cadence is subject to regulatory oversight by various agencies. These agencies require registration by Cadence and its employees. As a registered entity, Cadence is subject to examinations by regulators, which may be announced or unannounced. Cadence is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 7, 2019

Our Commitment to You

Cadence Wealth Management LLC (“Cadence” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Cadence (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Cadence does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<p>Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p> <p>Cadence shares Client information with Purshe Kaplan Sterling Investments, Inc. (“PKS”). This sharing is due to the oversight PKS has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the PKS Privacy Policy.</p>	Yes	No
<p>Marketing Purposes Cadence does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Cadence or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	No	Not Shared
<p>Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s]</p>	Yes	Yes
<p>Information About Former Clients Cadence does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (508) 898-0400 or by email at info@cadencewm.com.