



Chastain Wealth Management, LLC

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Chastain Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (404) 736-1261 or jennifer@chastainwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Chastain Wealth Management, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Chastain Wealth Management, LLC also is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Summary of Material Changes since the Last Update

Since the filing of our last annual updating amendment, dated January 29, 2024, we have the following material changes to report:

- The firm has submitted for registration with the U.S. Securities and Exchange Commission.
- Jennifer Odom was named the firm's Chief Compliance Officer.

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Item 4 Advisory Business

General Information

Chastain Wealth Management, LLC ("CWM ") was formed in 2016 and provides financial planning and portfolio management services to its clients. CWM was registered with the State of Georgia in November 2016 and the US Securities and Exchange Commission since 2025 and is subject to its rules and regulations.

Larren Odom is the sole owner of Affluence Financial Advisors, LLC, which is the sole principal owner of CWM. Please see Brochure Supplement for more information on Mr. Odom and other individuals who formulate investment advice and have direct contact with clients or have discretionary authority over client accounts.

SERVICES PROVIDED

At the outset of each client relationship, CWM spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and broadly identifying major goals of the client.

Clients may elect to retain CWM to prepare a full financial plan as described below. This written report is presented to the client for consideration. In most cases, clients subsequently retain CWM to manage the investment portfolio on an ongoing basis.

For those financial planning clients making this election, and for other clients who do not need financial planning but retain CWM for portfolio management services, based on all the information initially gathered, CWM generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile" or "Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan" or "Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments CWM will make on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client but are not necessarily written documents.

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

Financial Planning

One of the services offered by CWM is financial planning, described below. This service may be provided as a stand-alone service or may be coupled with ongoing portfolio management.

Financial planning generally includes advice that addresses one or more areas of a client's financial situation, such as:

Estate Planning - Estate planning involves planning for how an individual's assets will be preserved, managed, and distributed after death. CWM can work hand in hand with estate-planning attorney's when it may benefit the client.

Risk Assessment/Management – Through conversation, review of your current investments, future goals and selection of investments, CWM will work with clients to understand, analyze and address potential risks to help clients toward their goals.

Budgeting and Cash Flow - The total amount of money being transferred into and out of investment accounts, especially as affecting liquidity.

Retirement Planning - The process of determining retirement income goals and the actions and decisions necessary to achieve those goals. Retirement planning includes identifying sources of income, estimating expenses, implementing a savings program, and managing assets and risk.

Estate Planning - Estate planning involves planning for how an individual's assets will be preserved, managed, and distributed after death. CWM can work hand in hand with estate-planning attorney's when it may benefit the client.

Education Funding - Planning for future costs of education and creating appropriate accounts and investing in those accounts to meet forthcoming educational needs.

Investment Portfolio Design – CWM will review your current investments and work with the client to determine if each investment is working for the client in the way the client anticipates. This could include devising a strategy for acquiring and disposing of portfolio holdings.

Depending on a client's particular situation, financial planning may include some or all of the following:

- Gathering factual information concerning the client's personal and financial situation;
- Assisting the client in establishing financial goals and objectives;
- Analyzing the client's present situation and anticipated future activities in light of the client's financial goals and objectives;
- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet the goals and objectives of the client;
- Providing estate planning;
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

Once financial planning advice is given, the client may choose to have CWM implement the client's financial plan and manage the investment portfolio on an ongoing basis. However, the client is under no obligation to act upon any of the recommendations made by CWM under a financial planning engagement and/or to engage the services of any recommended professional.

Portfolio Management

As described above, at the beginning of a client relationship, CWM meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by CWM based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, CWM will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, CWM will have the authority to supervise and direct the portfolio without prior consultation with the client. CWM will manage all investments,

reinvestments and other transactions for the Account as Advisor deems appropriate, consistent, in Advisor's good faith judgment, with the Investment Policy Statement and Investment Objectives. Subject to any limitations set forth in the Investment Guidelines, Advisor is hereby empowered and authorized (and appointed as agent and attorney-in-fact) to act through any of its officers or employees to (a) purchase, sell, sell short, exchange, exercise or otherwise trade for the Account any and all securities, instruments and obligations of every description, including, without limitation, all stocks, bonds, mutual fund shares, deposits, and options or other rights to acquire any of the foregoing issued or incurred by any corporation, mutual fund, trust, association, firm, institution or governmental body, (b) take such other actions, or direct such custodians, futures commission merchants, investment advisors, brokers or dealers as Advisor or Client may from time to time select to take such other actions, as any officer or employee of Advisor may deem necessary or desirable to carry out the purpose and intent of the foregoing, without restriction or limitation unless specifically stated in writing. The Advisor will not charge any fee without ongoing management of assets.

Notwithstanding the foregoing, clients may impose certain written restrictions on CWM in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of CWM.

FeeX Services

We use a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Assets Under Management

As of December 31, 2024, CWM managed \$118,500,000 on a discretionary basis, and no assets on a non-discretionary basis.

CWM does not participate in a wrap fee program.

Item 5 Fees and Compensation

General Fee Information

Fees paid to CWM are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see **Item 12 – Brokerage Practices** for additional information. Fees paid to CWM are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally

including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, CWM and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Financial Planning Fees

When CWM provides stand-alone financial planning services to clients, a flat fee based on the scope of the engagement is negotiated at the time that CWM is retained for such services. Financial planning services are charged in advance through a fixed fee or hourly arrangement as agreed upon between the client and CWM. There will never be an instance where \$1,200 or more in fees is charged six or more months in advance. Hourly fees are generally charged when the scope of services cannot be determined or if the services are limited to one meeting. Fixed fees are generally quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. Hourly fees range from \$250 - \$750 per hour, depending on what is negotiated between CWM and the client. Similar financial planning services may be available elsewhere for a lower cost to the client. Fixed fees for longer-term consulting projects range from \$1,500 to \$15,000 per project. Fixed fees are based upon the disclosed hourly rate. An estimate for total hours and charges is determined at the start of the advisory relationship.

Typically, clients will be invoiced quarterly for all time spent by CWM as agreed upon by client or upon completion of the services if less than a quarter. CWM will accept check payment. Clients who wish to terminate the planning process prior to completion may do so with written notice. The client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period by contacting Larren Odom at (404) 736-1261. Upon receipt of written notification, any earned fee will immediately become due and payable, and any prepaid and unearned fees will be immediately refunded. CWM will deliver completed portions of any documents to the client. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

In the case a client receives both financial planning and portfolio management services, and therefore a financial planning advisory fee in addition to receiving a management fee of related assets for which financial planning services were provided, the Adviser will reduce financial planning fees to offset the Adviser's management fees.

Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

\$250,000 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.25%
\$1,000,001 - \$3,000,000	1.00%
Accounts over \$3,000,000	Negotiable

The fees are assessed on a flat rate based on the value of the account. For example, an account valued at \$650,000 would be charged 1.25% per year.

The minimum portfolio value is generally set at \$1,000,000. CWM may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where CWM deems appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s). For accounts with a margin balance, clients are assessed the management fee based on the gross value of the assets in

the account. In other words, the account value on which the fee is calculated is not reduced by the margin balance.

Either CWM or the client may terminate their Investment Advisory Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to CWM from the client will be invoiced or deducted from the client's account prior to termination.

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

CWM does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because CWM has no performance-based fee accounts, it has no side-by-side management.

Item 7 Types of Clients

CWM serves individuals, high net worth individuals, corporations, trusts and estates. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$5,000,000. Under certain circumstances and in its sole discretion, CWM may negotiate such minimums.

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

Methods of Analysis

In accordance with the Investment Plan, CWM will primarily invest in mutual funds, ETFs, common stocks and individual bonds. CWM utilizes Financial Architects to help guide its investment decisions. Financial Architects provides ongoing counsel to CWM regarding model portfolios, as well as well advice regarding specific client circumstances and investment strategies for such situations.

In general, mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation individual bonds or bond funds will generally be evaluated and selected based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies:

CWM's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. This means that the following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances.

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short

term price fluctuations. The frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Margin Transactions – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Trading – generally considered holding a security for less than thirty (30) days.

Risk of Loss

While CWM seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money. Investing in securities involves risk of loss that clients should be prepared to bear.

Below is a description of several of the principal risks that client investment portfolios face.

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

Risks of Investments in Mutual Funds and ETFs. As described above, CWM may invest client portfolios in mutual funds and ETFs. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. CWM has no control over the risks taken by the underlying funds.

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

Fixed Income Risks. CWM may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in an individual mutual fund or ETF that invest in bonds and notes. While investing in fixed income instruments, either directly or through individual mutual funds or ETFs, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that

changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Margin Risk. CWM does not use margin as an investment strategy. However, clients may elect to borrow funds against their investment portfolio. When securities are purchased, they may be paid for in full or the client may borrow part of the purchase price from the account custodian. If a client borrows part of the purchase price, the client is engaging in margin transactions and there is risk involved with this. The securities held in a margin account are collateral for the custodian that loaned the client money. If those securities decline in value, then the value of the collateral supporting the client's loan also declines. As a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in the client's account. The brokerage firm may issue a margin call and/or sell other assets in the client's account to accomplish this. It is important that clients fully understand the risks involved in trading securities on margin, including but not limited to:

- It is possible to lose more funds than is deposited into a margin account;
- The account custodian can force the sale of assets in the account;
- The account custodian can sell assets in the account without contacting the client first;
- The account holder is not entitled to choose which assets in a margin account may be sold to meet a margin call;
- The account custodian can increase its "house" maintenance margin requirements at any time without advance written notice; and
- The accountholder is not entitled to an extension of time on a margin call.

Item 9 Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of CWM or the integrity of CWM's management. CWM has no disciplinary events to report.

Item 10 Other Financial Industry Activities and Affiliations

Neither CWM nor its Management Person has any other financial industry activities or affiliations to report.

As a fiduciary, Chastain Wealth Management has certain legal obligations, including the obligation to act in clients' best interest. Chastain Wealth Management maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Chastain Wealth Management has entered into a succession agreement with Focus Partners Wealth, LLC, effective September 26, 2022. Chastain Wealth Management can provide additional information to any current or prospective client upon request to Larren Odom, CEO, at 404-736-1261 or Larren@Chastainwealth.com.

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

Code of Ethics and Personal Trading

CWM has adopted a Code of Ethics ("the Code"). CWM will provide a copy of the Code of Ethics to any client or prospective client upon request. CWM's Code has several goals. First, the Code is designed to assist CWM in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, CWM owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with CWM

(managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for CWM's associated persons. Under the Code's Professional Standards, CWM expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, CWM associated persons are not to take inappropriate advantage of their positions in relation to CWM clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time CWM's associated persons may invest in the same securities recommended to clients. Under its Code, CWM has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients.

Participation or Interest in Client Transactions

CWM and its employees may buy or sell securities that are also held by clients. As outlined above, CWM has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients. In the event of any identified potential trading conflicts of interest, CWM's goal is to place client interests first.

Consistent with the foregoing, CWM maintains policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with CWM's written policy.

Item 12 Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, CWM seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, CWM may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution.

CWM participates in the Fidelity Institutional Wealth Services ("FIWS") program. While there is no direct link between the investment advice CWM provides and participation in the FIWS program, CWM receives some benefits from the FIWS program. While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including, but not limited to research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended

broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. These services are not soft dollar arrangements but are part of the institutional platform offered by Fidelity.

CWM does not have any formal soft dollar arrangements.

CWM does not receive client referrals from the recommended broker-dealer.

Directed Brokerage

CWM does not generally allow directed brokerage accounts.

Aggregated Trade Policy

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

Item 13 Review of Accounts

Managed portfolios are reviewed at least quarterly but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by CWM. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Jennifer Odom, CWM's CCO, reviews all accounts.

For those clients to whom CWM provides separate financial planning and/or consulting services, reviews are conducted on an as needed or agreed upon basis. Such reviews are conducted by one of CWM's investment adviser representatives or principals.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, CWM provides quarterly reports for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

Item 14 Client Referrals and Other Compensation

As noted above, CWM receives an economic benefit from Fidelity in the form of support products and services it makes available to CWM and other independent investment advisors whose clients maintain accounts at Fidelity. These products and services, how they benefit our firm, and the related conflicts of interest are described in (Item 12 - Brokerage Practices). The availability of Fidelity's products and services to CWM is based solely on our participation in the program, and not on the provision of any particular investment advice. Neither Fidelity nor any other party is paid to refer clients to CWM.

CWM does not receive or pay compensation for client referrals for providing investment advice or other advisory services to our clients.

Item 15 Custody

Fidelity is the custodian of nearly all client accounts at CWM. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify CWM of any questions or concerns. Clients are also asked to promptly notify CWM if the custodian fails to provide statements on each account held.

CWM is deemed to have limited custody of client accounts solely by virtue of the firm's ability to withdraw fees directly from client accounts.

From time to time and in accordance with CWM's agreement with clients, CWM will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues. Clients are urged to compare the account statements they receive from the qualified custodian with invoices and reports they receive from CWM.

Item 16 Investment Discretion

As described above under Item 4 - Advisory Business, CWM manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, CWM will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving CWM the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client, and the withdrawal of advisory fees directly from the account. CWM then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with CWM and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between CWM and the client.

Item 17 Voting Client Securities

As a policy and in accordance with CWM's client agreement, CWM does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact CWM with questions relating to proxy procedures and proposals; however, CWM generally does not research particular proxy proposals.

Item 18 Financial Information

CWM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

CWM does not have any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

Neither CWM nor its principals have been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

Chastain Wealth Management, LLC is SEC registered, therefore there is nothing to be disclosed in this section.