



CIO Wealth Management, Inc.
Investment Advisory Firm CRD# 313576

**ITEM 1: COVER PAGE FOR PART 2A OF FORM ADV:
FIRM BROCHURE**

March 2022

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This brochure provides information about the business practices and qualifications of CIO Wealth Management, Inc. Any inquiries regarding the contents of this brochure should contact CIO Wealth Management's President & CCO, Andrew R Sullivan, CFP®, CIMA® by phone at (978) 287-1405 or by email at: andrew@ciowm.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Disciplinary history of the Registrant or its representatives may be obtained by calling the Massachusetts Securities Division at (617) 727-3548.

Additional information about CIO Wealth Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov

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

Item 2: Material Changes

In this item of CIO Wealth Management, Inc.'s ("CIO", "the Firm", "we", "us", or "our") Form ADV 2A, we are required to discuss any material changes since our last annual amendment.

- This is CIO Wealth Management, Inc.'s FYE2021 Annual Filing and there are no material changes to the firm at this time.

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Item 4: Advisory Business

Information about the Firm

CIO Wealth Management, Inc. (“CIO”, “the Firm”, “we”, “us”, or “our”) is an investment advisor registered with the Commonwealth of Massachusetts. CIO was incorporated in the Commonwealth of Massachusetts in 2009. The firm’s office is located in Sudbury, MA. CIO’s Principal is Andrew R. Sullivan, President and Chief Compliance Officer (CCO). As of FYE2021 the Firm had \$31,038,614.00 in assets under management on a discretionary basis.

The firm engages individuals, high net worth individuals, and families with discretionary investment management services tailored to each client’s unique financial profile and situation. We also offer qualified plan consulting services to small businesses. (i.e. 401(k)/Retirement Plan Consulting)

Client portfolios are developed based on a broad understanding of each client’s entire financial picture. CIO gains an understanding of each client’s goals, time horizon(s) to goal(s), risk tolerance, liquidity needs, and tax circumstances. Once due diligence is completed, CIO recommends, implements, and monitors client specific investment portfolios and financial planning strategies.

CIO, its ownership and employees, act as fiduciaries. Therefore we are always acting in the best interest of our clients. The firm’s services are delivered with honesty, integrity, competence and diligence. We exercise due care and independent professional judgement when engaging in investment research and analysis, and when making recommendations. As a fiduciary, we have an obligation to deal fairly with our clients, including the following responsibilities:

- To provide impartial advice;
- To make appropriate recommendations based a client’s needs, financial circumstances and investment objectives;
- To exercise a high degree of care and due diligence to ensure information is presented in an accurate manner;
- To have a reasonable basis, information and understanding of the facts in order to provide appropriate recommendations; and
- To disclose any material conflict of interest in writing

Investment Management Services

CIO provides our clients with discretionary investment management services. Portfolios may consist of mutual funds, exchange traded funds (ETFs), individual equities and bonds, preferred stock, certificates of deposit (CDs), REITS, and commodities. Each client portfolio has a customized mix of the prior mentioned investments types, based on each client’s investor profile and unique situation. Once the appropriate client portfolio has been determined and then implemented, we’ll then review the client’s portfolio at least annually, and rebalance based on client circumstances and market conditions.

Financial Planning and Consulting Services

Each CIO client relationship focuses on knowing and understanding our client’s financial goals and aspirations and looking at the client’s financial picture holistically. Each CIO client has their own personal financial dashboard through a leading financial planning and account aggregation software provider. This software offers data aggregation of CIO accounts, and held away accounts, such as employer retirement plans, bank accounts, real estate and other interests. We develop up-to-date balance sheets

and net worth statements and generate needs analysis and recommendations around common financial planning areas such as: college education planning, retirement planning, tax-minimization strategies, and estate planning. Our financial planning services currently provided by CIO through eMoney are in most cases a complimentary service that is included in our investment management fees. However, in more complex situations and with the clients approval, CIO reserves the right to charge additional hourly consulting fees done under a separate consulting agreement.

Qualified Plan Consulting Services

Our firm offers qualified plan consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor, administrator or named fiduciary. In general, these services include, but are not limited to:

- The creation of an “Investment Policy Statement”
- Non-Discretionary Plan-Level Investment Advice
- Discretionary Plan-Level Investment Advice
- Non-Discretionary Participant Investment Advice
- Discretionary Participant Investment Advice
- Performance Monitoring
- Investment Reports
- Educational Services (meetings & seminars)
- Enrollment Meetings

Topics for educational meetings and seminars may include Diversification, Asset Allocation, Risk Tolerance, Time Horizon and other investment-related subject matter relevant specific to the plan and its participants.

CIO provides additional types of qualified plan consulting services on an individually negotiated basis. All services shall be detailed in a written agreement and shall be consistent with the parameters set forth in the plan documents.

Depending on the negotiated services to be performed under the Retirement Plan Investment Advisory Agreement, CIO may serve/act as a “fiduciary” of a Plan as defined in Section 3(21) and/or Section 3(38) under ERISA. In providing services to the Plan, CIO’s status is that of an investment adviser registered with the Commonwealth of Massachusetts and any other applicable jurisdictions.

Item 5: Fees and Compensation

Investment Advisory Fees

Annual fees are paid in advance quarterly, and deducted, once authorized, from client accounts. The fees are based on a percentage of the market value of assets under management including cash and equivalents at the time of appraisal which is based on the closing balance of the last business day of the previous calendar quarter. CIO's investment management fees are charged at the following rates:

Assets Under Management	Annual Advisory Fee
The First \$1,000,000	1.25%
\$1,000,001 - \$3,000,000	1.00%
\$3,000,001 – \$5,000,000	0.75%
\$5,000,001 or more	0.50%

CIO reserves the right to customize client fee arrangements on a case-by-case basis.

The CIO Wealth Management investment advisory contract can be terminated by the client within five (5) business days of the signing of the investment advisory contract and the client will not be responsible for advisory fees incurred during that time.

Investment advisory agreements can be terminated by either party within thirty (30) days after written notice. The unearned portion of the prepaid fee will be refunded on a prorate basis.

Investment Advisory Fee Billing

The Firm receives written authorization from the client to deduct advisory fees from an account held Charles Schwab & Co, Inc. ("Charles Schwab", "Schwab"). CIO then sends the client an invoice to the client and Schwab as to of the amount of the fee to be deducted from the client's advisory account(s) at the end of each quarter. The qualified custodian sends the client a statement, at least quarterly, that reflects the deduction of the investment advisory fee. CIO sends the client a written report itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. CIO's investment advisory fees are billed quarterly, in advance, and are based on the balance of the accounts managed by CIO at the end of the previous quarter.

Complex Financial Planning Analysis and Consulting Fees

CIO does not charge additional fees for standard financial planning and/or access to client portals as it is a complimentary service. However, under more complex circumstances, CIO will charge an hourly consulting fee of \$300 per hour for research, analysis, and detailed planning recommendations. A budget will be given to the client depending on the complex planning scenario under consideration. CIO's hourly consulting services require a separate financial planning and consulting agreement with CIO for each situation being addressed.

Lower fees for comparable services may be available from other sources.

Qualified Plan Consulting Fees

Our advisory fees for qualified plan consulting services are negotiated with the plan sponsor or named fiduciary on a case-by-case basis. Fees vary and CIO's advisory fees can range from .20% to .50% of plan assets. This does not include fees charged by other firms affiliated with the qualified plan. (i.e. Custodian, Mutual Fund fees, third party administrator (TPA), and 3(21), 3(38) services, etc...)

Either party to the qualified plan consulting agreement can terminate the agreement upon written notice to the other party in accordance with the terms of the agreement for services. The qualified plan consulting fees will be prorated for the billing period in which the termination notice is given and any unearned fees will be refunded to the client, if applicable.

Other Fees and Expenses

CIO Wealth Management does not charge additional fees other than the fees listed above and/or negotiated.

CIO Wealth Management does not receive or share any additional fees or expenses incurred by advisory clients.

CIO Wealth Management charges negotiated fees for retirement plan (qualified plan) consulting services that differ from the above investment management fee structure.

CIO Wealth Management's clients will incur brokerage and other transaction costs by the custodian. CIO Wealth Management does not receive these fees nor does it share in these fees; see Item 12 for additional information.

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

“Performance based fees” are fees that are based on a share of capital gains or capital appreciation of a client’s account. “Side-by-side management” refers to the practice of managing accounts that are charged performance based fees while at the same time managing accounts that are not charged performance based fees. CIO Wealth Management, Inc. does not charge performance based fees, therefore we also do not engage in side-by-side management.

Item 7: Types of Clients

Our firm has the following types of clients:

- Individuals, including high net worth individuals;
- Businesses, Trusts, Families and Estates; and
- Qualified Retirement Plan Sponsors

CIO does not have a minimum asset requirement to initiate a financial advisory relationship.

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

CIO uses a combination of investment analysis methods in the management of our client investment strategies. Below is general information about the analysis and strategies that may be used by CIO and the types of risk of loss associated with the investments often held in CIO managed accounts.

Methods of Analysis

Fundamental Analysis- Fundamental analysis focuses on the idea that at any given point in time a company's shares have an intrinsic or enterprise value which the market will eventually acknowledge. To determine this value, a corporation's financial performance must be observed and reviewed. Consideration will also be given to the company's position in its industry sector group and in the context of overall economic conditions. Metrics such as earnings-per-share (EPS), dividend yield, price-earnings (P/E) ratio, and return on equity (ROE) are used to determine the value of a company's shares. A company's assets, liabilities and expenses are considered. If analysis suggests a company is undervalued, it may indicate a good time to purchase that company's shares. If analysis suggests a company is overvalued, it may be a good time to sell the company's shares. Quality company shares intended as long term holds may go through periods of being considered undervalued and/ or overvalued.

Technical Analysis- Technical analysis uses historical stock price movements and share volumes to recognize reoccurring price movements and investor behavior to predict future price movement. Technical analysis focuses on the price of the company's shares, and not their intrinsic value. Risks associated with technical analysis include not identifying the financial health of a company and heavy reliance on historical pricing and charting information.

Bottom-Up Analysis- Bottom-up analysis focuses on the merits of the individual stock or company shares. Metrics such as pricing power, management competence, competitive advantages, and valuation are considered. Bottom-up analysis does not focus on the state of the underlying economic or market conditions. Bottom-up analysis is more microeconomic and does not consider the larger economy.

Top-Down Analysis- Top-down analysis considers the broader economic, market, and industry trends before engaging in the recommendation of specific investments. Top-down analysis can be used to overweight or underweight a sector due to positive or negative trends respectively. Top down analysis can also be used in tactical asset allocation weightings.

Investment Strategies

CIO uses investment strategies that are appropriate given each client's specific needs and goals and consistent with each client's investment objectives, risk tolerance, time horizon, investment exclusions, and other considerations.

Our firm generally follows the investment principals of Modern Portfolio Theory (MPT). MPT supports the idea that an investor should, within the context of their specific investor profile, own a diversified mix of investments in different asset classes (equities/ bonds/ cash) to achieve the most efficient return over time with lower volatility. CIO uses investment diversification through asset allocation (equities/ bonds/ cash) and investment styles (example, US large cap growth equities or US high yield bonds).

In taxable accounts (non-retirement accounts), CIO endeavors to keep portfolio turnover low and whenever possible keep tax expenses to a minimum.

Risk of Loss

All investments involve the risk of loss, including but not limited to, loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and loss of future earnings. While CIO manages client portfolios in a manner consistent with each client's investor profile and risk tolerances, there are no guarantees that our efforts will be successful. As such, clients should be prepared to bear the following investment risks of loss:

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, a large cap technology company with "wide moats", long term contracts, leading technology, proven management and large cash reserves is a different investment risk than a newly public small cap growth technology company in a competitive race for technological and market share leadership with limited cash on hand, unproven management and a limited window of time to realize significant business growth.
- **Credit Risk:** the value of fixed income securities may decline and/ or the issuer or guarantor of the security may fail to pay interest or principal when payments are due. Generally lower rated securities have a higher credit risk and therefore a higher default risk, versus higher rated securities.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties (i.e. Non-traded REITs and other alternative investments) are not.
- **Market Risk:** The price of a security, bond, mutual fund or ETF may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Concentration Risk:** The risk of loss due to an investor's assets being concentrated in one investment or one type of investment. Diversification spreads risk out among multiple investments and investment classes.

- **Horizon Risk:** The risk that an investor's time horizon may be shorted due to an unexpected event such as loss of employment. This situation may create a need to sell investments the investor was planning to hold for the long term. Sales could need to be a time when the markets and/or the investments are trading at depressed prices.

- **Longevity Risk:** The risk of an investor outliving their retirement savings. An early retirement creates additional longevity risk. People living longer due better environmental conditions and better healthcare also creates longevity risk.

Item 9: Disciplinary Information

CIO Wealth Management, Inc. has not been the subject of any disciplinary action(s) and does not have any legal or disciplinary information to disclose at this time. Any disciplinary information regarding the firm's Investment Advisor Representatives would be disclosed here as well as additional information being disclosed on the CIO's IAR's ADV Part 2B.

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and/or Affiliations

Neither the firm, nor its representatives have an application pending to become a broker-dealer.

Neither the firm, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

We have no other relationship or arrangement with a related person at this time that is material to our advisory business.

Mr. Sullivan has an active insurance license and holds appointments with the following insurance companies:

- Jackson National Life Insurance Company
- Lincoln National Life Insurance Company (The)

Mr. Sullivan has the ability sell insurance products that have commissions and other fees associated with them. This would be considered a conflict of interest and once identified we will present you with a conflict of interest document that will identify the “conflict of interest” and both the Advisor and the Client will be asked to sign the document acknowledging that the conflict of interest does exist.

Item 11: Code of Ethics, Client Transactions and Personal Trading

Code of Ethics

CIO has a written Code of Ethics that is available upon request. The firm strives to comply with all applicable laws and regulations governing its practices. We have set forth guidelines for professional standards of conduct for our employees, the goal of which is to protect our client interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with clients. All employees must acknowledge these guidelines annually. Firm employees are required to report any violations of the Firm's Code of Ethics.

CIO maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about clients or their account holdings by CIO Wealth Management or any associated person.

Participation or Interest in Client Transactions

Neither the firm nor any of our associated persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

Personal Trading

The Firm's employees may invest in and hold securities that are also held in client accounts. CIO employee accounts may participate in block trading in tandem with other client accounts. When not block trading, clients' accounts will be prioritized, over CIO employees during trade processing if applicable. The firm aims to mitigate any conflict of interests by not allowing CIO employees to front run clients and potentially receive a more favorable price.

Item 12: Brokerage Practices

Selecting Our Custodian

Our firm uses Charles Schwab as our custodian. CIO does not receive compensation from Schwab nor does CIO engage in any soft dollar arrangements with our custodian.

Specifically, CIO has a custodial agreement with Schwab Advisor Services™, the business unit dealing with Registered Investment Advisors (RIAs).

We selected Charles Schwab as our custodian based on Schwab's dominate market share position in servicing independent RIA businesses, history of leadership in the RIA custody space, leading technology and commitment to technology investment, and superior service both at the business and client levels. We believe Schwab delivers highly competitive, if not best-in-class, custody, trade execution, clearance, and settlement services.

CIO Wealth Management, Inc. is independently owned and not affiliated with Charles Schwab & Co., Inc.

How We Selected Schwab As Our Custodian

After careful consideration and due diligence of multiple custodians, CIO selected Schwab as our custodian due to Schwab's highly competitive and industry leading capabilities in the following areas:

- Combination of large scale, proven custody and execution services
- Operational excellence when supporting RIA client's businesses
- Breadth of investment products and services
- Access to high quality institutional investment research
- Access to a wide range of banking products and other services beneficial to clients
- Competitive pricing and fee structures across client products and services
- Corporate financial strength and stability
- Strong, positive reputation and brand
- A focus on technology, technology investment, and cybersecurity

While we believe our clients are well served with what we regard as an overall best in class experience with Schwab, other custodians may have more attractive service metrics in certain business areas, and these metrics may be looked at more or less favorably by other RIA firms or industry professionals.

Products and services available to CIO from Schwab

Schwab Advisor Services™ is Schwab's business unit serving independent advisory firms like CIO. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts; while others helps us to manage and grow our business.

Services that benefit CIO clients:

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products and services available through Schwab include some that might not otherwise be available at other custodians.

Services that do not directly benefit CIO clients

Schwab makes other products and services available to CIO that benefit the firm but may not directly benefit the clients. These products and services assist us in managing and administering client accounts and relationships. In addition to providing CIO with investment research, Schwab provides us with software and technology which:

- Provides access to client account data
- Facilitates trade execution and allocates aggregated trade orders for multiple client accounts
- Provides pricing and other market data
- Facilitates payment of our advisory fees from CIO client accounts
- Assists with back-office functions, recordkeeping and client reporting

Services that benefit CIO

Schwab offers services intended to help us manage and further develop our financial advisory business. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefit providers, human capital consultants, and insurance providers
- Marketing consulting and support

Best Execution

"Best execution" means achieving favorable financial terms for a transaction based on the relevant facts. We believe we are meeting our duty of best execution of client trades by using Charles Schwab as our custodian. Charles Schwab and Co., Inc. has a strong history of best execution performance that is well documented in industry publications and testing results.

Your Custody and Brokerage Costs

Schwab does not charge account fees. Schwab is compensated by earning interest on the cash in the Schwab Cash Features Program. Schwab may charge a "prime broker" or "trade away" fee for certain trades. Commissions may be incurred on certain equity, bond, or ETF trades.

More About Schwab, CIO's Custodian.

Order Aggregation

It is CIO Wealth Management practice to aggregate transactions across multiple client accounts if and when possible, and as long as it is in our clients best interests.

Directed Brokerage

Directed Brokerage is the practice of a client directing their financial advisory firm to execute trades in a particular security through a particular broker or exchange with the goal of potentially incrementally better execution pricing. CIO does not offer directed brokerage services.

Trade Errors

If a trade error occurs when entering a trade on behalf of a client, CIO's policy is to restore a client's account to the position it should have been in had the trade error not occurred. Depending on the circumstances, corrective actions can include canceling/busting said trade, adjusting the client account to reflect the appropriate asset allocation and/or the reimbursement of any fees to the client account.

Item 13: Review of Accounts

CIO conducts regular internal on-going reviews of client accounts and individual holdings in the context of each client's financial goals, and short and long term financial plans.

Client Reviews and Reports

CIO provides each client household with a comprehensive year-end portfolio review report containing performance, holdings, and asset allocation information. Annual review meetings (in person, video conference or phone) stem from the delivery of the year-end review report. During annual reviews updates are made to client financial information and profiles as provided by the client. CIO's financial planning and data aggregation portal is often used to capture and discuss an accurate current view of the client's entire financial picture (data aggregation of CIO managed accounts and accounts held away), to track the progress of education and retirement funding plans, and to manage retirement income plans. One-off client reviews occur regularly, often due to a change in client personal or financial circumstances, and can be requested and arranged for at any time.

Regular Reports

CIO clients receive monthly account statements, transaction confirmations and other correspondence directly from Charles Schwab. Once clients set up online account access with Schwab, electronic delivery of some or all Schwab correspondence can be selected. Schwab online account access provides clients with detailed account information, and access to useful documents such as statements and annual tax documents.

Item 14: Client Referrals and Other Compensation

Referral Fees

Our firm does not pay for referrals. We have no referral compensation agreements in place and have no plans for such agreements.

Other Compensation for Advisory Services

CIO does not receive any formal economic benefits through our custody relationship with Schwab. See Item 12, “(Schwab) Services that do not directly benefit CIO clients”, “(Schwab) Services that benefit CIO”.

Item 15: Custody

Custody- Account Statements

Custody for all CIO accounts is maintained at Charles Schwab. Monthly account statements, tax documents, and online access is provided through client Schwab accounts.

Custody- Fee Debiting

Through CIO's client investment advisory agreement, CIO clients give written authorization to have their CIO advisory fees directly debited from their Charles Schwab account. With the exception of the ability to debit client accounts for advisory fees, CIO does not and will not have custody of client funds or securities. On their monthly Schwab statement or online, clients can review their "Transaction Detail – Fees and Charges" for their Activity: "Advisor Fee" and Description: "MGMT FEE TO ADVISOR".

Item 16: Investment Discretion

Investment Discretion

CIO is granted discretionary investment management authority of client Schwab accounts through an investment advisory agreement signed by the client at the initiation of each client relationship or account opening.

The authorization permits CIO to exercise full discretion as to the nature, type and amount of securities purchased or sold without preapproval by the client. CIO's exercise of discretion is limited to the investor profile guidelines set up with the client at the initiation of the relationship or account opening. Clients can request to exclude certain securities from their CIO accounts and can request prior notice or discussion of certain transactions.

Item 17: Voting Client Securities

Proxy Votes

Proxy voting is an important shareholder right and clients should take reasonable care to ensure their rights are exercised in this area. CIO does not and will not accept proxy authority for any client securities. Our clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities owned by them be voted and in making all elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings or other corporate events relating to their investments. Clients receive proxies directly from their custodian (Schwab) or the transfer agent. In the event proxies are sent to CIO, we will forward them to our clients.

For more information on Proxy voting please contact Andrew Sullivan.

Class Action Lawsuits

Our firm is not responsible for determining if securities held by clients are the subject of a class action lawsuit or whether clients are eligible to participate in a class action settlement or litigation nor does CIO initiate or participate in litigation to recover damages on a client's behalf as a result of class actions, misconduct, or negligence of any party that is the subject of a class action suit. Any and all inquiries regarding class action suits should be initially directed to the custodian in which the assets are/were held.

Item 18: Financial Information

Financial Condition

CIO Wealth Management does not have any financial conditions that will prohibit it from meeting its contractual obligations to clients.

Item 19: Requirements for State-Registered Advisers

- A. Andrew R Sullivan is the President & CCO of CIO Wealth Management. Andrew R. Sullivan's education and business background can be found on CIO Wealth Management's supplemental ADV Part 2B for Andrew R Sullivan.
- B. Andrew R Sullivan's other business activities can be found on ADV Part 2B.
- C. CIO Wealth Management does not accept performance-based fees or other fees based on a share of capital gains on and/or capital appreciation of the assets of its clients.
- D. CIO Wealth Management's President & CCO Andrew R Sullivan has not been the subject of a civil and/or criminal action.
- E. CIO Wealth Management and its management persons do not have a relationship and/or arrangement of any kind with any issuers of securities.

Item 20: Additional Information

Privacy

CIO is committed to maintaining the confidentiality, integrity, and security of the personally identifiable information (“PII”) entrusted to us. Our firm maintains secure offices and further secure client document storage. We employ up-to-date electronic security measures such as a firewall and virus protection, and data encryption techniques and authentication procedures on our computer network. CIO does not share client PII under any circumstances unless at the written request of the client to provide relevant financial information to their CPA, attorney, mortgage broker or other contact. CIO must provide access to all firm records and client information at the request of state or federal regulators or law enforcement.

We are required to deliver our Privacy Policy/ Notice to clients annually. We will notify clients in advance if our privacy policy changes.

Business Continuity Plan (BCP)

CIO has created a written BCP that is available upon request. A written BCP helps us identify procedures relating to an emergency or significant business disruption. Such procedures are in place to help CIO continue to meet its on-going client fiduciary obligations.

Conflicts of Interest Disclosure

CIO Wealth Management discloses all material conflicts of interest prior to a client signing the CIO Wealth Management Investment Advisory Agreement, Financial Planning Agreement, and Qualified Plan consulting Agreement. This is done via CIO Wealth Management’s Conflict of Interest Disclosure document.