



860 Greenbrier Circle,
Suite 101
Chesapeake, VA 23320

(757)961-0700 phone
(757)961-0701 fax
team@ffinancial.net

Version date: March 25, 2025

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

This brochure provides information about the qualifications and business practices of Fitzwilliams Wealth Management Inc. (FWM). If you have any questions about the contents of this brochure, please contact Brian Lindberg (757-961-0700) and/or Brian@ffinancial.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about FWM, Inc. also is available on the SEC's website at www.Advisorinfo.sec.gov.

Item 2: Material Changes

In the future, this page will discuss only specific material changes that are made to this brochure and will provide readers with a summary of such changes. We will also reference the date of our last annual update of our brochure.

The material changes in this brochure from the last annual updating amendment of Fitzwilliams Wealth Management on 03/14/2024 are described below. Material changes relate to Fitzwilliams Wealth Management's policies, practices or conflicts of interests.

- There are no material changes to report.

Item 3: Table of Contents

Item 2: Material Changes	2
Item 3: Table of Contents	3
Item 4: Types of Advisory Services	4
Item 5: Fees and Compensation	5
Item 6: Performance-Based Fees and Side-By-Side Management	6
Item 7: Types of Clients	6
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9: Disciplinary Information	7
Item 10: Other Financial Industry Activities and Affiliations	7
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	7
Item 12: Brokerage Practices	8
Item 13: Review of Accounts	9
Item 14: Client Referrals and Other Compensation	10
Item 15: Custody	10
Item 16: Investment Discretion	10
Item 17: Voting Client Securities	11
Item 18: Financial Information	11
Item 19: Requirements for State-Registered Advisors	11

ADVISORY FIRM DESCRIPTION

Fitzwilliams Wealth Management, Inc. (“FWM” or the “Firm”) was founded in January of 2021 by the affiliated entity, Fitzwilliams Financial, Inc. Fitzwilliams Financial was originally founded in February 2008. Timothy Fitzwilliams is the principal owner of both Fitzwilliams Financial and Fitzwilliams Wealth Management.

Item 4: Types of Advisory Services

Fitzwilliams Wealth Management is an investment advisor that provides clients with financial planning services and investment management services.

FINANCIAL PLANNING

FWM provides customized financial planning services to our clients to help them set and achieve their financial goals. Financial planning services include the areas of retirement planning, insurance planning, estate planning, tax planning, education planning, and/or charitable planning. Financial Planning services are offered to all investment management clients.

INVESTMENT MANAGEMENT

FWM provides investment management services to our clients by engaging Sub-Advisors to manage our client’s accounts. These Sub-Advisors are unaffiliated, third-party investment advisory firms that receive a portion of the investment management fee that the client pays to FWM. The Sub-Advisor constructs an investment portfolio that is tailored to the specific needs of each of FWM’s clients and then monitors and maintains those portfolios on an ongoing basis by placing trades in FWM’s clients’ accounts on a discretionary basis. FWM monitors accounts continuously to ensure alignment with clients’ objectives.

The Sub-Advisors uses many different types of investment securities in order to accomplish this, including but not limited to stocks, bonds, mutual funds, and exchange traded funds (ETF’s). The Sub-Advisor may also use options contracts and other derivative securities if and when it is appropriate. The Sub-Advisor uses an active investment management philosophy, which means that it may place trades (buys and sells) in our client’s accounts on a fairly regular basis. By doing so, both firms seek to make sure that our client’s investments are properly positioned to take advantage of our forecast for the marketplace over the short to medium term, which is generally one to three years.

If a client has not received a copy of the brochure documents at least 48 hours prior to signing an agreement, the client has five business days in which to cancel the agreement without penalty.

TAILORED ADVISORY SERVICES

In order to tailor each portfolio to the needs of the individual, we gather information from each prospective client to help us assess the client’s specific goals, objectives, and tolerance for investment risk. We also gather information about any projected financial needs and other circumstances which may affect how we manage the accounts. During this process we also discuss any restrictions that the client may wish to place on investments; and whether or not we can accommodate those restrictions. This information is then summarized in an Investment Policy Statement (IPS), which governs the way that we manage each account, and it is updated as necessary to make sure that we are managing a client’s portfolio to appropriate objectives.

The Investment Policy Statement also includes an initial investment portfolio recommendation. We build each investment portfolio from a mix of four investment strategies that the Sub-Advisor has designed, which range from conservative to very aggressive. These strategies are: Bond, Current Income, Stock, and Strategic Allocation. By using a mix of these strategies, we are able to structure the portfolio to match the goals and objectives of each individual client while also working within the client’s tolerance for investment risk.

CLIENT ASSETS UNDER MANAGEMENT

As of December 2023, the Firm had \$91,054,676 of discretionary assets under management and \$2,454,877 of non-discretionary assets under management.

Item 5: Fees and Compensation

FINANCIAL PLANNING

Fitzwilliams Wealth Management’s Financial Planning fees are included in FWM’s investment management fees.

INVESTMENT MANAGEMENT

Fitzwilliams Wealth Management’s annual fee schedule for our investment management services is as follows:

Account Value	Annual Fee Rate
\$0 - \$2,500,000	2.00%
\$2,500,001 - \$5,000,000	1.50%
\$5,000,001 - \$10,000,000	1.00%
All Assets over \$10,000,000	0.80%

Our minimum account size, which is negotiable, is \$100,000. This fee schedule is not negotiable though FWM does reserve the right to reduce fees for special circumstances at our own discretion. Special circumstances might include exceptionally large accounts as well as those for employees and family members. Our fee is billed monthly in arrears based upon average daily balance. When an account is opened during a month, that month’s fee are charged in arrears based on average daily balance.

FWM clients, whose primary residence on file is Florida, are provided an invoice, through mail, email, or their client portal, at the beginning of each month based on the market value (as reported by the account custodian) of their investment portfolio as of the last day of the previous month. Please note that it is the client’s responsibility to verify the accuracy of the fee charged for the period. If a client decides to cancel within the first five days after signing the advisory agreement, any asset management fees paid to us will be refunded in full. After the initial five-day period, upon final termination of the agreement, the client will be provided a pro-rata refund of fees paid based on the number of days the assets were under our management. FWM must receive notice from the client in writing in order to determine the date of cancellation.

Clients pay their fees to Fitzwilliams Wealth Management by directing the custodian to allow FWM to deduct its fees directly from their investment account(s). Invoice will itemize the fees charged. Additionally, clients may instruct FWM to deduct all of the fees from one or more specific accounts. Even though FWM uses a Sub-Advisor to manage investment accounts, no additional fees will be charged to the client by the Sub-Advisor. Total fees charged to clients will not exceed 2% of the assets under management when a third-party investment Advisor is utilized.

Prior to introducing Pennsylvania clients to another investment Advisor (“IA”), FWM will be responsible for determining whether the investment advisory firm is properly licensed, notice filed, or exempt from registration with the Pennsylvania Department of Banking and Securities.

OTHER FEES

In addition to the asset management fees charged by Fitzwilliams Wealth Management, clients will incur custodian fees, mutual fund expenses, and other brokerage costs including trading commissions. Client accounts pay directly for the fees assessed by the custodian, such as transaction, wire, exchange, or custodial fees. FWM will do its best to avoid and/or minimize the impact of any such fees because the firm recognizes that fees erode the performance of a client’s investment accounts. FWM does not benefit directly from these fees. For more information on the custodial relationship, please refer to the section below “Brokerage Practices” for more details.

Fees must be disclosed that are based on performance (such as a share of the capital gains or capital appreciation) or side-by-side management (which is when some clients pay fees based on performance while others do not).

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

FWM does not charge any performance-based fees or engage in side-by-side management.

Item 7: Types of Clients

FWM provides investment advisory services to:

- Individuals
- High net worth individuals
- Pension and profit-sharing plans
- Trusts, estates, or charitable organizations
- Corporations and other businesses

FWM typically requires a minimum account size of \$100,000 for investment management services. However, FWM may accept smaller accounts based upon special circumstances, at its own discretion. For example, FWM may accept a smaller account for a family member of an existing client.

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

It is Fitzwilliams Wealth Management’s goal to make sure the firm’s clients are always in the most appropriate investments for their specific needs and goals at all times. This means investing for each individual client to maximize potential returns while paying attention to a client’s tolerance for investment risk. While FWM does its best to minimize this risk, please remember that investing in securities involves the risk of loss, and clients must accept that their account may decline in value. FWM’s Sub-Advisor uses a combination of the following types of analyses in evaluating investments for client accounts:

- Charting—Analysis of charts of past stock performance
- Fundamental—Analysis of financial attributes of a company, such as revenue growth, debt-to-equity ratio, inventory turnover, etc.

- Technical—Analysis which assumes past performance is a predictor of future performance
- Cyclical—Analysis based on business, industry, calendar, or historical cycles

INVESTMENT STRATEGIES

Fitzwilliams Wealth Management works with Sub-Advisors to utilize the most appropriate investment strategies for each client. Each Sub-Advisor has different strategies that they employ to help clients meet their goals. FWM has no particular investment strategies, since the client will be using the strategies of a Sub-Advisor. Each client will be provided specific information regarding the Sub-Advisor’s investment strategy in their IPS.

INVESTMENT RISK

Investing in securities involves risk of loss that clients should be prepared to bear. Clients should be aware that even if we use our best efforts, our efforts may not be successful. Any security in a client’s account, other than a United States Treasury instrument, could lose all or part of its value. Many factors and events outside our control can affect the securities markets and the value of securities in client accounts. Examples include, but are not limited to, changes in domestic or foreign political leadership, breaking news events, natural disasters, adverse weather conditions, terrorist activity, or changes in the Internal Revenue Code. We may not be able to accurately predict the effects on the securities markets of these factors and events or how they may affect the value of securities held in clients’ accounts. FWM and the Sub-Advisors do not guarantee the future performance of the client’s account or any specific level of performance, the success of any investment decision or strategy that we may use, or the success of our overall management of the client’s account.

Item 9: Disciplinary Information

There have been no disciplinary actions against FWM or any employees of FWM.

Item 10: Other Financial Industry Activities and Affiliations

Fitzwilliams Wealth Management is affiliated with Fitzwilliams Financial, a licensed insurance broker in the State of Virginia. Fitzwilliams Financial offers clients insurance and annuity products that generate commissions through the sale of these products. From time to time, employees of FWM will offer clients insurance or annuity products to its clients. Clients should be aware that these products pay a commission to the recommending FWM employee. This creates a conflict of interest between the employee and the client. Clients are not required to purchase insurance or annuity products through any representative of FWM and/or Fitzwilliams Financial in their capacity as a licensed insurance agent.

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

FWM has adopted a Code of Ethics which describes the general standards of conduct that the Firm expects of all Firm personnel (collectively referred to as “employees”) and focuses on three specific areas where employee conduct has the potential to adversely affect the client:

- Misuse of non-public information
- Personal securities trading
- Outside business activities

Failure to uphold the Code of Ethics may result in disciplinary sanctions, including termination with the Firm. Any client or prospective client may request a copy of the Firm's Code of Ethics, which will be provided at no cost.

The following basic principles guide all aspects of the Firm's business and represent the minimum requirements to which the Firm expects employees to adhere:

- Clients' interests come before employees' personal interests and before the Firm's interests.
- The Firm must fully disclose all material facts about conflicts of interest of which it is aware between itself and clients as well as between Firm employees and clients.
- Employees must operate on the Firm's behalf and on their own behalf consistently with the Firm's disclosures and to manage the impacts of those conflicts.
- The Firm and its employees must not take inappropriate advantage of their positions of trust with or responsibility to clients.
- The Firm and its employees must always comply with all applicable securities laws.

MISUSE OF NONPUBLIC INFORMATION

The Code of Ethics contains a policy against the use of non-public information in conducting business for the Firm. Employees may not convey non-public information nor depend upon it in placing personal or recommending clients' securities trades.

PERSONAL SECURITIES TRADING

FWM or individuals associated with the Firm may buy, sell, or hold in their personal accounts the same securities the Sub-Advisor recommends to its clients. Employee trading is done individually by employees, while client trading is done through the Sub-Advisor. Therefore, employees will not have prior knowledge of the day-to-day trading by the Sub-Advisors. Any trades placed by employees for their own accounts on the same day that Sub-Advisors place trades for clients would be purely coincidental.

Employees are required to submit reports of personal securities trades on a quarterly basis, and securities holdings annually. These are reviewed by the Chief Compliance Officer to ensure compliance with the Firm's policies.

OUTSIDE BUSINESS ACTIVITIES

Employees are required to report any outside business activities generating revenue. If any are deemed to be in conflict with clients or FWM, such conflicts will be fully disclosed, or the employee will be directed to cease this activity.

Item 12: Brokerage Practices

The Firm recognizes its responsibility to attain best execution and recognizes that limiting its custodial relationships may affect its ability to provide best execution on a trade-by-trade basis. However, the Firm evaluates its entire custodial relationship and best execution at a minimum of annually.

Fitzwilliams Wealth Management will determine which custodians or brokers will be used for client accounts. The intent of this is to allow us to use those brokers with which an on-going relationship has been established, and which will provide better pricing, execution, and transaction costs (commissions) for all transactions. The services provided and commissions charged by any brokers are reviewed periodically to ensure that the best possible service is being provided for our clients. At present, our primary broker for custody of client accounts and execution of client transactions is Charles Schwab.

The Sub-Advisor has the ability to use Charles Schwab & Co., Inc. (Schwab) on behalf of FWM and FWM's clients.

SELECTION OF OTHER ADVISORS OR MANAGERS AND HOW FWM COMPENSATED FOR THOSE SELECTIONS

FWM provides investment management services to our clients by engaging Sub-Advisors to manage our client's accounts. These Sub-Advisors are unaffiliated, third-party investment advisory firms that receive a portion of the investment management fee that the client pays to FWM. The Sub-Advisor constructs an investment portfolio that is tailored to the specific needs of each of FWM's clients and then monitors and maintains those portfolios on an ongoing basis by placing trades in FWM's clients' accounts on a discretionary basis. FWM monitors accounts continuously to ensure alignment with clients' objectives and conducts client reviews at a minimum of annually.

FWM has a solicitation agreement in place with The Pacific Financial Group, Inc. ("TPFG") and Howard Capital (HC). The agreements set forth the terms and conditions under which TPFG, HC, and FWM will service their mutual client relations through the products and services offered by TPFG and HC.

RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

FWM currently has no formal soft-dollar arrangements, where specific products or services are paid for with soft dollars generated for the Firm by individual trades placed in client accounts. However, the custodian provides the Firm with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

DIRECTED BROKERAGE

Clients are not allowed to request that trades be enacted through a specific broker. FWM requires clients to use one of the Firm's recommended broker-dealers as account custodian. Not all advisors require their clients to use a particular custodian or broker.

ORDER AGGREGATION

FWM's Sub-Advisors may aggregate brokerage orders for its clients and allocate the securities purchased or sold among the participating accounts, with each account receiving the same terms. Since Schwab does not charge transaction fees at the account level whether or not a trade is placed as a block trade, aggregating trades does not affect client transaction fees.

The proportion in which participating accounts will share transactions will be determined by the Sub-Advisor on the basis of investment objectives, cash availability, expected cash and liquidity needs, and other relevant factors. The overarching principle for any allocation is that no client is intentionally favored over another client that is similarly situated.

Item 13: Review of Accounts

Fitzwilliams Wealth Management conducts periodic reviews of client accounts, generally no less than quarterly. These reviews entail comparing the client's investment objective to the portfolio holdings, cash flows, changes in the client's financial position, and often discussion with the client.

FWM will meet with each client annually to review his/her/their account. The frequency of these reviews can be impacted by several factors including:

- The size and complexity of the client's accounts
- The complexity of the client's financial situation
- Unexpected changes in the client's goals or objectives
- Changes in political and economic circumstances
- Other lifestyle changes warranting a review of the client's financial situation

Periodic written performance reports will be prepared for each review in addition to the monthly account statements and confirmations that are generated by the account custodian.

Item 14: Client Referrals and Other Compensation

The Firm does not receive referrals from a broker/dealer or third-party providing service to FWM.

Item 15: Custody

Advisor exercises limited custody over the client's funds by direct debit management fees from the account. Where Advisor deducts its management fee from client accounts utilizing a qualified custodian, the States in which FWM is registered requires the firm to meet the following requirements:

Prior to having fees deducted via a qualified custodian, FWM will:

- a. Advisor must possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- b. Advisor must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account.
- c. Advisor must send the client a written invoice itemizing the fee, the invoice must detail any formulae 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. This may be included with the clients quarterly performance report.

The client will also receive written statements no less than quarterly from the custodian. Advisor encourages clients to carefully review their account statements for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

Item 16: Investment Discretion

FWM provides discretionary and non-discretionary investment advisory services to clients. For discretionary investment advisory services, FWM clients grant the Firm full discretion over their investment accounts under a limited power of attorney assigned to FWM. FWM grants the Sub-Advisor full trading authority under a limited power of attorney assigned to the Sub-Advisor.

As a result, FWM has engaged the Sub-Advisor to determine both the investments, and how much of each, should be purchased or sold on each client's behalf. The Sub-Advisor follows the investment strategy as set forth in the Investment Policy Statement (IPS). Clients may place restrictions on the Firm's discretion in writing. The Sub-Advisor will follow any restrictions

and/or guidelines provided by the client to FWM. Fitzwilliams Wealth Management has the ability to hire and fire the Sub-Advisor at the Firm's discretion.

Item 17: Voting Client Securities

FWM grants Sub-Advisors the power to vote proxies for FWM clients. The Sub-Advisors must adopt and implement written policies and procedures governing the voting of client securities (proxy statement). All proxies received for FWM clients will be treated in accordance with these policies and procedures.

Any client may request a copy of Sub-Advisor's proxy policy and to see or receive records showing how Sub-Advisors has voted on the client's behalf.

When it is determined that voting a proxy is in the relevant clients' best interests, Sub-Advisors generally vote with management recommendations. Exceptions will be evaluated and documented on a case-by-case basis in consultation with the Chief Compliance Officer. FWM will periodically review Sub-Advisor's proxy voting records on behalf of FWM clients to ensure compliance with the client's best interest and any client restrictions on voting.

Item 18: Financial Information

There is no financial condition that is reasonably likely to impair the Firm's ability to meet its contractual commitments to its clients.

Item 19: Requirements for State-Registered Advisors

FWM does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

FWM's principal executive officers and management persons include:

- Timothy Fitzwilliams, Chief Executive Officer
- Brian Lindberg, Investment Advisor Representative/Chief Compliance Officer
- Corrine Fitzwilliams, Owner/Chief Marketing Officer

Please see the brochure supplements for information regarding the Firm's principal executive officers and management persons, except for Daniel Roebuck, who is not non-client facing.

FWM does not charge any performance-based fees or engage in side-by-side management.

Neither the Firm nor any of its officers or principals has been involved in an award in an arbitration claim alleging damages, or an award of being found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither the Firm nor any of its officers or principals has a relationship or arrangement with an issuer of securities.