

Dorsey Groomes Wealth Management, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: October 1, 2025

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This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Dorsey Groomes Wealth Management, LLC (referred to as “we,” “our,” “us,” “Firm,” “Advisor,” or “DGWM”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (302) 530-1068. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about DGWM to assist you in determining whether to retain the Advisor.

Additional information about DGWM and its Advisory Persons is available on the SEC’s website at www.advisorinfo.sec.gov by searching with the Advisor’s firm name.

Item 2: Material Changes

This version of Dorsey Groomes Wealth Management, LLC's Disclosure Brochure, dated June 10, 2025, contains information regarding our qualifications, business practices, nature of the investment management services we provide, as well as a reasonable disclosure of any known and potential material conflicts of interest relating to our investment management business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with us. Should you have any additional questions or concerns regarding DGWM or the contents of this Brochure, please contact Norma Duckett, Chief Compliance Officer by phone at (614) 300-0549.

Material Changes

This Brochure is the Firm's revised filing and there are custodial changes to disclose.

Full Brochure Available

From time to time, we will amend this Disclosure Brochure to reflect changes in business practices, regulations, and other routine updates as required updates as by the respective regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and/or if a material change occurs.

To request a complete copy of our Brochure, contact us by telephone at (614) 300-0549 or by email to nduckett@dorseygroomeswm.com. Alternatively, you can view the current Disclosure Brochure online at the SEC's Investment Advisor Public Disclosure website at www.advisorinfo.sec.

Item 3: Table of Contents

Item 1 Cover Page.....	i
Item 2: Material Changes	ii
Item 3: Table of Contents	iii
Item 4: Advisory Services	1
Item 5: Fees and Compensation	3
Item 6: Performance-Based Fees and Side-By-Side Management	5
Item 7: Types of Clients	5
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	5
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.....	8
Item 12: Brokerage Practices	9
Item 13: Review of Accounts	10
Item 14: Client Referrals and Other Compensation.....	10
Item 15: Custody.....	10
Item 16: Investment Discretion	11
Item 17: Voting Client Securities	11
Item 18: Financial Information.....	11
Item 19: Requirements for State-Registered Advisers	11
Privacy Policy	13

Item 4: Advisory Services

A. Firm Information

Dorsey Groomes Wealth Management, LLC (“Dorsey Groomes”, “DGWM” or the “Firm”) is applying for registration as a registered investment advisor with the State of Ohio. Dorsey Groomes is organized as a Limited Liability Company (“LLC”) under the laws of the State of Ohio and has filed its initial application to become registered as an investment advisor. The firm is owned solely by Norma Duckett since August 2024.

B. Advisory Services Offered

Financial Planning Services

There are different financial planning engagements possible with Dorsey Groomes.

The most typical engagement is for a comprehensive financial plan that assesses the ability of current and future resources to meet clients’ needs and goals. Analysis includes coordinated hypothetical projections and stress testing. Alternative strategies may be analyzed and presented as recommendations to improve the clients’ outlook. These alternatives may include changes in savings or spending rates, reallocation of investments, different timing of events like retirement, or different pension and Social Security claiming strategies. They may also suggest different uses of existing investments or changing to different types of investments.

Limited planning engagements are possible. These may include high level evaluations and educational content on financial management basics. Partial updates to earlier comprehensive plans would be in this category.

Hourly planning engagements are possible depending on circumstances. They may include evaluations and opinions on complex or unusual investments, second opinions on plans created elsewhere, or other similar analyses and reviews.

Investment Management Services

Dorsey Groomes offers ongoing investment management services, typically based on a comprehensive financial plan. Suitable investment programs or products are selected out of a wide range available from third party firms. Principal selection criteria include but are not limited to cost efficiency, riskiness of the investment strategies, investment program lifespan and history, and the investment firm’s experience and reputation.

Complete account reviews are scheduled annually. Interim checks and communications during the year are common. A complete review should occur whenever there is a significant change in the clients’ financial or life conditions.

Dorsey Groomes will consider investment management engagements independent of a comprehensive financial plan on a case-by-case basis.

Written Acknowledgement of Fiduciary Status

Dorsey Grooms performs its services as a fiduciary. This means the clients' interests are always placed ahead of the advisor's interests. Conflicts of interest are avoided wherever possible. Some conflicts cannot be avoided. They are managed and disclosed as plainly as possible.

The fiduciary requirements when advising clients on their employee benefit plans and IRAs have been specifically determined by the U.S. Department of Labor. In December 2020, they adopted what's known as PTE 2020-02. PTE stands for prohibited transaction exemption. That means advising clients on their employee benefit plans and IRAs is allowed, provided certain rules and procedures are followed. Dorsey Grooms complies with these rules and procedures which include:

- Acknowledging our fiduciary status in writing.
- Disclosing our services and material conflicts of interest.
- Adhering to impartial conduct standards.
- Documenting and disclosing the specific reasons that any rollover recommendations are in the retirement investor's best interest.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Dorsey Grooms seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and consideration of Dorsey Grooms' economic, investment or other financial interests. To meet its fiduciary obligations, Dorsey Grooms attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Dorsey Grooms' policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Dorsey Grooms' policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Services Limited to Specific Types of Investments

Dorsey Grooms generally limits its investment advice to exchange traded funds (ETFs), mutual funds and unit investment trusts (UITs) across all asset classes, real estate investment trusts (REITs), individual stocks and bonds and insurance products including annuities. Dorsey Grooms may use other securities as well to help diversify a portfolio when applicable.

C. Client Account Management

Prior to engaging Dorsey Groomes to provide investment advisory services, each Client is required to enter into one or more written agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Dorsey Groomes does not participate in any wrap fee programs.

E. Assets Under Management

Dorsey Groomes is a newly established firm that applied for registration. Therefore, Dorsey Groomes has \$0.00 in discretionary assets under management and \$0.00 in non-discretionary assets under management as of the date of this brochure. Clients may request more current information at any time by contacting the Advisor.

Item 5: Fees and Compensation

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

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in arrears, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets and Investment advisory fees are based on the following schedule:

<u>Assets Under Management (\$)</u>	<u>Annual Rate (%)</u>
\$0-\$1,000,000	1.00%
\$1,000,001 - \$1,500,000	0.75%
\$1,500,001 to \$3,000,000	0.50%
Over \$3,000,000	0.25%

Dorsey Groomes uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty with 30 days' written notice.

Financial Planning Services

The fee for a comprehensive financial plan is fixed, generally from a minimum of \$250 to a maximum of \$1,000. Extraordinarily complex cases may require a higher fee. Charges for hourly planning engagements are \$200 per hour. Clients may be given general notions of the time needed, but specific estimates, oral or written, are not available with this service. Fees are due upon delivery of the completed plan report.

B. Fee Billing

Payment of Portfolio Management Fees

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account at the Custodian or may be invoiced and billed directly to the client on a quarterly basis. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account quarterly. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Dorsey Groomes. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by Dorsey Groomes to be paid directly from their account held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Payment of Financial Planning Fees

Financial planning fees are paid by check or available electronic payment options. Fixed financial planning fees are paid upon delivery of the plan.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Dorsey Groomes in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodians do not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodians typically charge for mutual funds and other types of investments. The fees charged by Dorsey Groomes are separate and distinct from these custody and execution fees.

In addition, all fees paid to Dorsey Groomes for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), transfer of assets to a new custodian and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Dorsey Groomes, but would not receive the services provided by Dorsey Groomes which are designed, among other things, to assist the Client in determining

which products or services are most appropriate for each client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Dorsey Groomes to fully understand the total fees to be paid.

D. Compensation for Sales of Securities

Dorsey Groomes does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

Dorsey Groomes does not charge performance-based fees for its investment advisory services. The fees charged by Dorsey Groomes are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Item 7: Types of Clients

Dorsey Groomes offers investment advisory services to individuals and high net worth individuals. The amount of each type of Client is available on Dorsey Groomes' Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Dorsey Groomes requires that clients have at least \$1,000 in investable assets in order to engage the firm's services. Dorsey Groomes reserves the right to waive the minimum on a case-by-case basis.

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

A. Methods of Analysis

Financial plans are developed using advanced software available to the industry (non-proprietary). The emphasis is on analyzing lifetime yearly cash flows of anticipated direct income, investment income and distributions, necessary expenses, and desired expenditures and investments. Planning is then focused on maximizing the chances of sustaining a favorable financial position throughout life. No software program can model financial variables perfectly. The actual performance of accounts, as well as investment markets and the economy is bound to differ from the projections in a plan.

Financial planning clients are under no obligation to implement the plan recommendations with Dorsey Groomes. For those that do, it is important to understand investing entails risks, including the loss of principal. A thorough financial plan can help prepare clients for volatility in their investments but cannot guarantee against future losses.

B. Investment Risks

Dorsey Groomes rarely acts as a client's investment portfolio manager. Usually, your Dorsey Groomes advisor selects and supervises portfolio management by third party firms with strong

expertise, operational capacity, and reputation to provide investment management effectively and efficiently. Since most investment recommendations are diversified and cover a wide range of asset classes, there can be a large number of specific risks to consider. The following list is substantive but not exhaustive. Fact sheets, prospectuses, or offering circulars are generally available for review before investing.

- **Market Risk.** This is the risk that the value of securities owned by an investor may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally, or individual industries.
- **Interest Rate Risk.** This is the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or fixed income fund with a shorter duration.
- **Credit Risk.** This is the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Liquidity Risk.** This is the risk that an investor would not be able to sell or redeem an investment quickly or would not be able to sell or redeem an investment quickly without significantly affecting the price. Liquidity risk is heightened when markets are distressed. Generally, alternative investments have higher liquidity risk than equities, fixed income securities or mutual funds or ETFs.
- **Issuer-Specific Risk.** This is the risk that the value of an individual security or particular type of security can be more volatile than the market as a whole and can perform differently from the value of the market as a whole.
- **Underlying Securities Risk.** Investing in ETFs, mutual funds, Unit Investment Trusts (UITs), Real Estate Investment Trusts (REITs), model portfolios, separately managed accounts, variable annuity subaccounts and other pooled investments includes the risks of the individual securities selected by the portfolio managers. Investors should understand the degree of diversification among the underlying securities and any peculiar risks within the asset classes making up the portfolio.
- **Income Tax Risk.** Investments may come with or accumulate imbedded exposures to income tax. Some major tax exposures are generally known from the outset, as with traditional IRAs, 401k plans and annuities. Others are related to the portfolio managers' investment and trading decisions. They can accumulate less visibly and lead to unexpected or unplanned increases in income tax owed.
- **Concentration Risk.** When a portfolio manager decides to meet the stated objectives by investing a significant portion of capital in the securities of a single issuer, industry, sector, country or region, there is concentration. Such a strategy may be considered reasonable under certain conditions; however, less diversified or non-diversified portfolios generally have greater risk of loss.

Dorsey Groomes considers these and other risks when selecting investment programs and when acting as portfolio manager.

Item 9: Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Dorsey Groomes or its management persons. Dorsey Groomes values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov by searching with the Advisor's firm name.

Item 10: Other Financial Industry Activities and Affiliations

As a registered investment advisor, we are required to disclose when we, or any of our principals, have any other financial industry affiliations.

A. Financial Industry Activities

Dorsey Groomes is not a registered broker/dealer and does not have an application pending as a broker/dealer.

B. Financial Industry Affiliations

Dorsey Groomes is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. Other Material Relationships

Norma Duckett is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment Advisor.

Dorsey Groomes addresses this conflict of interest by requiring its supervised persons to always act in the client's best interest, including when acting as an insurance agent. Dorsey Groomes periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. Dorsey Groomes will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by Dorsey Groomes' supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

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

A. Code of Ethics

Dorsey Groomes has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. This Code applies to all persons associated with Dorsey Groomes (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to each Client. Dorsey Groomes and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of Dorsey Groomes' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (302) 530-1068.

B. Personal Trading with Material Interest

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

C. Personal Trading in Same Securities as Clients

Dorsey Groomes allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Dorsey Groomes requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

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

Item 12: Brokerage Practices

A. Selection and Recommendation

Custodians/broker-dealers will be recommended based on Dorsey Groomes' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Dorsey Groomes may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Dorsey Groomes' research efforts. Dorsey Groomes will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Dorsey Groomes uses Altruist and Charles Schwab as custodians for client assets.

B. Research and Other Soft Dollar Benefits

Dorsey Groomes currently does not participate in any kind of soft dollar arrangement.

C. Brokerage for Client Referrals

Dorsey Groomes does not receive any compensation from any third party in connection with the recommendation for establishing an account.

D. Directed Brokerage

Dorsey Groomes will require clients to use a specific broker-dealer to execute transactions. Not all Advisors require clients to use a particular broker-dealer.

E. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Dorsey Groomes will execute its transactions through the Custodian as authorized by the Client. Dorsey Groomes may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any Clients' accounts.

F. Trade Error Policy

The Firm maintains a record of any trading errors that occur in connection with investment activities of its clients. In accordance with SEC recommendations, the Firm will bear any losses due to trading errors. Gains generated as a result from a trade error will either: (i) follow the custodian's policy; (ii) be credited to the client's account; or (iii) be donated to charity. The Firm does not retain any gains associated with trade errors.

Item 13: Review of Accounts

A. Frequency of Reviews

All client accounts for Dorsey Groomes' advisory services provided on an ongoing basis are reviewed at least quarterly by Norma Duckett, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Dorsey Groomes are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Norma Duckett. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 12.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed because of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Dorsey Groomes if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

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

Item 14: Client Referrals and Other Compensation

A. Compensation Received by Dorsey Groomes

Norma Duckett may receive compensation for the sale of insurance products. Clients are not required to purchase insurance products from Ms. Duckett as similar products are available from other providers.

B. Client Referrals from Solicitors

Dorsey Groomes does not engage paid promoters for Client referrals.

Item 15: Custody

Dorsey Groomes does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified

custodian.” Clients are required to engage the Custodian to retain their funds and securities and direct Dorsey Groomes to utilize that Custodian for the Client’s security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Dorsey Groomes to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 11 – Brokerage Practices.

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

Item 16: Investment Discretion

Dorsey Groomes provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Dorsey Groomes generally manages the client’s account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Dorsey Groomes' discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Dorsey Groomes.

Item 17: Voting Client Securities

Dorsey Groomes will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

Neither Dorsey Groomes, nor its management, have any adverse financial situations that would reasonably impair the ability of Dorsey Groomes to meet all obligations to its Clients. Neither Dorsey Groomes, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Dorsey Groomes is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

Item 19: Requirements for State-Registered Advisers

A. Firm Management

Norma Duckett is the Founder and sole investment adviser representation of Dorsey Groomes Wealth Management, LLC, owning 100% of the Firm. Ms. Duckett also serves as the Firm’s Chief Compliance Officer. The education and business background of the investment adviser

representative can be found in the attached Brochure Supplement (Form ADV Part 2B) for the Firm.

B. Other Business Activities

DGWM is not engaged in any other business other than providing investment management services, though Ms. Duckett does sell insurance products in her individual capacity as an insurance agent.

C. Performance-Based Fees

The Firm does not charge performance-based fees.

D. Disciplinary Disclosure Reporting

a. Arbitration Claims

Neither the Firm nor its management persons has been found liable in any arbitration claim alleging damages in excess of \$2,500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery counterfeiting or extortion or dishonest, unfair or unethical practices.

b. Civil, Self-Regulatory Organization (SRO), or Administrative Proceeding

Neither the Firm nor its management persons has been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

Clients of Dorsey Groomes can obtain the disciplinary history of the Firm or its representatives by going to www.adviserinfo.sec.gov and searching by the Firm's name..

c. Relationships or Arrangements with Securities Issuers

Neither the Firm nor its management has any relationship or arrangement with any issuer of securities.

Dorsey Groomes Financial Advisory Services, LLC

Privacy Policy

An important part of the relationship we have with our clients is the information they share with us. We want each client to know how we treat their private information. We keep personal information such as Social Security Numbers and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. In dealing with Dorsey Groomes, clients can expect that we will take the steps outlined below to keep all their information confidential and secure.

Our Privacy Policy

In providing financial services and products to our clients, we collect certain non-public information about them. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients, or as permitted by law. Protecting your privacy is important to us.

Information We Collect

The non-public personal information we have about clients includes what they give us when opening an account or communicating with us. This could include:

- Name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment history
- Account balance and account transactions

Information We Disclose

We do not disclose personal information about our clients to third parties, other than the chosen Sub-Advisor. We may disclose anonymous information that cannot be linked to an individual client on occasion, but only to companies that we hire to help us provide products and services to our clients, or as required by law, or as authorized by the client personally. We do not sell personal client information to anyone.

How Information Is Used

We use information about our clients to provide our investment advisory services to them, such as managing their investment account. We may disclose this information to third parties as permitted by law, including the outside broker-dealers, custodians, administrators, transfer agents, accountants or attorneys that we need to use to provide our services to clients. From time to time,

we must give information about our business to regulatory authorities. This may, or may not, include personal information about our clients and their accounts.

How Information Is Safeguarded

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of client information. These include confidentiality agreements with companies we hire to help us provide services to clients, password-protected user access to our computer files, and strict confidentiality policies that apply to all Firm personnel, vendors and contractors.

Your Data Choices

You have the following choices with respect to your personal information:

Decline to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

How to contact us. You can reach us in the following ways:

Office Location 220 W Bridge St, Suite 117, Dublin, OH 43017

Email: nduckett@dorseygroomeswm.com

Phone: (614) 300-0549