



## **Bortolussi Wealth Management, Inc.**

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### **Form ADV Part 2A – Disclosure Brochure**

**Effective: February 22, 2013**

This brochure provides information about the qualifications and business practices of Bortolussi Wealth Management, Inc. (“BWM”). If you have questions about the contents of this brochure, please contact us at (774) 278-8187 or by email at [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com).

BWM is a Registered Investment Advisor with the State of Massachusetts. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“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 BWM to assist you in determining whether to retain the Advisor.

Additional information about BWM also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Bortolussi Wealth Management, Inc.**

**CRD #: 155780**

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**Hopkinton, MA 01748**

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## **Item 2 – Material Changes**

Form ADV 2 is divided into two parts: Part 2A and Part 2B. Part 2A (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. Part 2B (the “Brochure Supplement”) provides information about advisory personnel of BWM.

### Item 4

Advisory Business has been updated to reflect BWM’s assets under management as of this filing.

### Item 8

BWM has updated its methods of security analysis as of this filing.

### Item 11

BWM has updated its Code of Ethics as of this filing.

### Item 13

BWM has updated the BWM’s process of reviewing accounts as of this filing.

### Item 16

BWM has updated its statement on investment discretion as of this filing.

### Item 19

BWM has updated the information in this section as of this filing.

### Form ADV2B – Bortolussi, Adam

BWM has updated the information on Mr. Bortolussi as of this filing.

### Privacy Policy

BWM has added a privacy policy as of this filing.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Advisor Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (774) 278-8187 or by email at [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com).

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## **Item 4 – Advisory Services**

### Firm Information

Bortolussi Wealth Management, Inc. (“BWM” or the “Advisor”) is a Registered Investment Advisor with the Commonwealth of Massachusetts. The Principal owner, Adam D. Bortolussi, incorporated BWM in the state of Massachusetts during the later part of 2010. Adam D. Bortolussi received his B.S. in Finance from Quinnipiac University in 2004 and is an MBA candidate from Salve Regina University with an anticipated graduation date in 2013.

BWM provides investment solutions that are customized to its Clients. BWM provides investment solutions to individuals, high net worth individuals, trusts, small businesses and estates (“Client”). The main goal of BWM is to develop meaningful and lasting relationships with its Clients along with a greater understanding of their financial needs over the course of the Client relationship. Clients enter into an Investment Advisory Agreement with BWM when they choose to conduct business with the Advisor.

### Advisory Services Offered

BWM offers financial planning to its Clients through developing an understanding of the Client’s current and future needs and objectives. Once a course of action is agreed upon between BWM and the Client, a plan will be implemented, monitored and adjusted by BWM. BWM has ongoing communication with all of its Clients. BWM will work with the Client’s current Advisors to provide a holistic approach to its Client’s financial needs.

### Client Account Management

BWM will tailor its advisory services to the individual needs of its Clients. Clients have the ability at the initial meeting to impose restrictions on certain investments and during the review of the Client’s portfolio. BWM’s investment strategy is long-term focused, however BWM may allocate Client’s portfolios with a short-term focus based on the needs of the Client. BWM reviews all accounts and based on the goals, risk tolerance, time horizon and objectives of the Client on an ongoing basis.

BWM evaluates and selects securities for Client portfolios after performing an internal due diligence screen on securities selected for Client portfolios. BWM utilizes cash, individual stocks, bonds, low cost mutual funds, and exchange traded funds within client portfolios. BWM reviews Client accounts to harvest capital gains and losses depending on market conditions and Client circumstances.

### Wrap Fee Programs

BWM does not participate in wrap fee programs.

### Assets Under Management

BWM currently has \$11,500,000.00 in Client assets. \$6,500,000.00 is managed on a discretionary basis and \$5,000,000.00 is managed on a non-discretionary basis. BWM will provide investment advisory services and portfolio management services. BWM will not provide securities custodial or other administrative services.

## **Item 5 – Fees and Compensation**

### Advisory Services Fees

BWM calculates fees based on assets under management with the Advisor. The fee schedule for assets under management is as follows:

\$0 - \$999,999.99	1.00%
\$1,000,000.00 - \$1,999,999.99	.75%
\$2,000,000.00 and above	.50%

Client fees are prorated depending on the inception date of the account.

Fees may be negotiable based on individual Client circumstances.

BWM charges an hourly fee based at \$100.00 per hour for clients looking for a basic financial plan without monitoring. These clients are advised when an hourly charge is in effect and they are given an estimated amount of time required to perform the requested service.

#### Fee Billing

Depending on the service performed by BWM, fees will either be directly deducted from Client accounts on a monthly basis or billed directly to the client. An invoice will be sent to the Client on a quarterly basis showing all fees charged to the Client during the quarterly time period.

#### Other Fees

Clients may incur additional fees based on different investments that may be held in Client accounts by third parties. These may include, but are not limited to custodian fees, mutual fund expenses and brokerage transaction costs. Additional transaction and brokerage costs can be incurred. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. Please see item 11, Brokerage Practices for additional information.

#### Advance Payment of Fees and Termination

BWM does not require advance payment of fees. If the Client chooses to terminate their relationship with BWM, BWM will prorate fees based on the termination date of the Investment Advisory Agreement with BWM.

#### Compensation for Sales of Securities

BWM does not receive any compensation for securities transactions within Client accounts.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Neither BWM nor any management person accepts performance-based fees or engages in side-by-side management.

### **Item 7 – Types of Clients**

BWM provides investment advice to individuals, high net worth individuals, trusts, small businesses and estates. The minimum size account that BWM will provide advice for is \$100,000.00. This requirement may be waived based on individual circumstances.

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

### Methods of Analysis

BWM's primary relies upon fundamental analysis methods in developing investment strategies for its Clients. BWM also utilizes the Wall Street Journal, Morningstar, third-party research, analytical analysis, BNY Jaywalk, annual reports, press releases and Internet sources in developing investment strategies. BWM customizes all portfolios for its Clients.

BWM will select cash, individual stocks, bonds, low cost mutual funds, and exchange trades funds in developing Client portfolios. BWM's main objective is to outperform the benchmark that is designated as the benchmark to base Client portfolio performance off of. In attempting to outperform the benchmark, BWM's objective is not to take excessive risk. Many of the stocks that BWM invests in are considered large capitalization companies with a history of paying a dividend. BWM will look to diversify Client accounts based on Client's needs and objectives. BWM looks to hold assets over a year and does not aim to have excessive trading in Client Accounts. At year-end all Client accounts are evaluated to minimize tax implication for tax planning.

### Risk of Loss

Investing in securities involves risk of loss. Clients should be prepared to bear these risks. BWM's investment objective is to manage these risks. The client should know that securities fluctuate in value or lose value. There is no guarantee that a Client will meet their investment goals. Past performance is not guarantee of future results.

## **Item 9 – Disciplinary Information**

There are no legal or disciplinary events held against BWM or any of any of its employees.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Neither BWM nor any management person has any other financial industry activities or affiliations.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading**

### Code of Ethics

BWM has developed a Code of Ethics to describe the fiduciary duty of BWM to represent our Clients in an ethical manner. BWM will provide a copy of its Code of Ethics to any Client or any Prospective Client who wishes to have one. You may request a copy of BWM's Code of Ethics at any time, by contacting us at (774) 278-8187 or by email at [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com).

It is the duty of every employee at BWM to place the interests of the Client first. All recommendations to Clients shall be appropriate for the Client account strategy and be made with the care, skill, prudence and diligence under the circumstances then prevailing Client circumstances. All Employees of BWM are to provide professional services with integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence. BWM has the fiduciary duty to serve its Clients best interests; in doing so all employees are required

to abide by BWM's code of ethics. All employees are required to read and sign that they have received BWM's Code of Ethics. Employees must adhere to BWM's Privacy Policy to maintain security over Client private information. Employees must avoid scenarios in which conflicts of interest or inappropriate advantage could occur. Employees must not accept gifts, investment opportunities, or gratuities from any entity seeking to conduct business with BWM. Employees must abide by the standards set forth in Rule 204A of the Investment Advisers Act of 1940.

#### Personal Trading With Material Interest

BWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of our Clients. BWM does not have any material interest in any of the securities traded in Client accounts. BWM does not act as principal in any transactions.

#### Personal Trading in Same Securities as Clients

BWM allows our employees to purchase and sell the same securities as clients. Employees must seek approval before buying and selling securities from a supervising person at BWM in all personal accounts. BWM will only allow placement of these trades after they have been placed and filled within the Client's account. At no time will BWM or any associated person transact in any security that would negatively impact any Client.

### **Item 12 – Brokerage Practices**

#### Recommendation of Custodian

BWM recommends working with Shareholders Service Group or an online brokerage firm such as Charles Schwab, Merrill Edge, E-Trade, TD Ameritrade and Fidelity. These companies are recommended based on low trading costs; low or no annual fees and ease of use for the investor.

#### Research and Soft Dollar Benefits

BWM does not receive any research or other soft dollar benefits from other financial institutions.

#### Brokerage Referrals

BWM does not receive any compensation or referrals from any broker-dealer or third-party.

#### Aggregating and Allocation Trades

BWM does not aggregate the purchases or sale of securities for various client accounts. BWM aims to manage each client account individually. This practice results in higher costs to the client because each transaction charge will be based on an individual trade within each Client's own account.

### **Item 13 – Review of Accounts**

#### Frequency of Reviews

BWM will review accounts on an ongoing basis. Reviews are conducted by Adam D. Bortolussi, President of BWM. Accounts are formally reviewed semi-annually. The purpose of reviewing accounts is to allow BWM to have a greater understanding of its Client's needs along with keeping accounts in line with the financial goals and objectives of the Client.

#### Causes for Reviews

BWM will review accounts in times of economic uncertainty or any major event in the marketplace. Client accounts may be review more frequently during these events.

#### Reporting Review

Clients will receive a monthly or quarterly statement form the brokerage firm where their account is held. Clients will also receive a quarterly statement from BWM detailing the fees that they have been billed by BWM on a monthly basis for that quarter. Financial plans will be reviewed annually. Clients also have the ability to establish access to view their accounts online with their custodian. Clients should contact their Custodian directly to establish online access to their account(s).

### **Item 14 – Client Referrals and Other Compensation**

BWM is a fee-only investment advisory firm that is only compensated by the Client. BWM does not enter any arrangement with third parties where an economic benefit is provided to BWM of its clients. Sales awards or prizes are not bestowed upon any employee of BWM in exchange for a client referral. It is against company policy to accept any award or gift from any party due to conflicts of interest that may arise.

BWM does not provide any compensation to any party for Client referrals.

### **Item 15 – Custody**

BWM will not accept custody of any Client funds or securities. Clients will work directly with their broker dealer on funding accounts or any mater regarding securities. BWM will assist clients with these matters, but will never accept custody or Client funds or securities.

### **Item 16 – Investment Discretion**

BWM does accept discretionary authority to manage securities account on behalf of Clients, meaning BWM has the ability to trade Client accounts on behalf of the Client without seeking client consent to make a trade. There are three type of discretion normally available to Clients for Clients to grant BWM: full, partial and trading authorization.

BWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. This information can be found in BWM's Investment Advisory Agreement. This agreement will specify if the Client wishes to grant BWM discretion over their account(s) or not. Discretionary trades will be made in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

BWM will not accept authority to vote Client securities. It is the responsibility of the Client to decide if they would like to vote on matters in regards to their securities. BWM will assist the Client regarding questions pertaining to voting securities, but will not vote on behalf of the Client.



## Item 18 – Financial Information

BWM does not require the prepayment of more than \$1,200.00 in fees per Client, six months or more in advance. Neither BWM nor any of its employees have any existing or anticipated financial conditions that would be likely to impair its ability to meet any contractual commitments to its Clients.

## Item 19 – Requirements for State Registered Advisors

### Education and Business Background

The President of BWM is Adam D. Bortolussi. Please reference Item 2 of Part 2B below for more information regarding Mr. Bortolussi's education and business background.

### Other Business Activities

Mr. Bortolussi does have additional business activities. Mr. Bortolussi is the Trustee for a Realty Trust. Mr. Bortolussi is also a Board Member with the 200 Foundation. Mr. Bortolussi spends a minimal amount of time on both activities.

### Performance-Based Fees

BWM is not compensated for any advisory services with performance-based fees.

### Disciplinary Information

Neither BWM nor Mr. Bortolussi have been involved with the events listed below.

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500.00 for any of the following:

- An investment or an investment-related business or activity
- Fraud, false statement(s), or omissions
- Theft, embezzlement, or other wrongful taking of property
- Bribery, forgery, counterfeiting, or extortion
- Dishonest, unfair, or unethical practices

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- An investment or an investment-related business or activity
- Fraud, false statement(s), or omissions
- Theft, embezzlement, or other wrongful taking of property
- Bribery, forgery, counterfeiting, or extortion
- Dishonest, unfair, or unethical practices

There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against BWM or Mr. Bortolussi.

**Form ADV Part 2B – Individual Disclosure Brochure**

**For**

**Adam D. Bortolussi  
President**

**Effective: February 22, 2012**

This Brochure Supplement provides information about Adam D. Bortolussi that supplements the Bortolussi Wealth Management, Inc. (“BWM”) Brochure. You should have received a copy of that brochure. Please contact Adam Bortolussi at (774) 278-8187 or [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com) if you did not receive Bortolussi Wealth Management, Inc.’s brochure or if you have any questions about the contents of this supplement.

Additional information about Adam D. Bortolussi is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Educational Background and Business Experience

Adam D. Bortolussi is the Principal and supervisor of BWM. Mr. Bortolussi was born in 1981. He earned a B.S. in Finance from Quinnipiac University in 2004 and is a candidate for a MBA from Salve Regina University with an anticipated graduation date in 2013. Mr. Bortolussi started his business career at Morgan Stanley Dean Witter in 2003 as an Intern. His employment history is listed below.

President, Bortolussi Wealth Management, Inc.	11/2010 – Present
Regional Sales Director, Columbia Management	08/2010 – 10/2010
Investment Specialist, Merrill Lynch	12/2009 – 07/2010
Financial Advisor, UBS Financial Services, Inc.	11/2006 – 09/2009
Financial Advisor, Morgan Stanley Dean Witter	06/2004 – 11/2006

## Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Bortolussi.

## Item 4 – Other Business Activities

Mr. Bortolussi has additional business activities that are detailed in Item 19 – Requirements for State Registered Advisors. The time spent on these activities is not substantial.

## Item 5 – Additional Compensation

Mr. Bortolussi does not receive additional compensation outside of his regular salary at BWM.

## Item 6 - Supervision

Mr. Bortolussi serves at the President and Supervisor of BWM. Mr. Bortolussi can be reached at (774) 278-8187 or [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com).

BWM has developed a Code of Ethics in relation to its fiduciary duty to its Clients. This along with internal compliance assists each employee in meeting his or her fiduciary duty to Clients. BWM is subject to regulatory oversight and examinations by these regulators, which may or may not be announced. In addition to regulatory oversight BWM is required to periodically update information to these agencies.

## Item 7 – Requirements for State Registered Advisors

Mr. Bortolussi does not have any additional information to disclose.

## Privacy Policy

Bortolussi Wealth Management, Inc. ("BWM") is committed to protecting the personal information that we collect from our Clients. BWM has developed a policy that explains what data we collect from our Clients and how that data is maintained. All data collected by BWM is for the explicit use of BWM and its employees. Information may be shared with third parties such as Shareholders Service Group, BWM's preferred custodian if that Client agrees to maintain an account with Shareholder Service Group. Additionally information may be shared with the Client's preferred custodian of choice. This information is considered essential to conduct normal business practices with BWM and the custodian of choice. No information is sold to third party vendors at any time. Your information may also be disclosed to you, persons we believe to be your authorized agent, regulators in order to satisfy BWM's regulatory obligations and is otherwise required or permitted by law.

Information that we collect from you is detailed in our account opening package and typically contains your: name and address, social security number or TIN number, phone number, e-mail address, net-worth, income, tax bracket, outside investments and account balances.

BWM takes its responsibility to protect and maintain all personal information very seriously. BWM maintains physical and electronic safeguards in order to protect client information. Client privacy is one of BWM's top priorities.

If you feel that you have received a fraudulent e-mail or message from BWM, please contact your designated advisor immediately or contact us at (774) 278-8187 or [adam.bortolussi@bortowm.com](mailto:adam.bortolussi@bortowm.com).