



Form ADV Part 2A – Disclosure

Brochure Updated: March 14, 2024

This Disclosure Brochure provides information about the qualifications and business practices of Common Cents Wealth Management, LLC ("Common Cents"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (954) 769-0837 or by email at info@cc-wealth.com.

Common Cents is a Registered Investment Advisor with the State of Florida. 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 Common Cents to assist you in determining whether to retain the Advisor.

Additional information about Common Cents and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new 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 Common Cents.

Common Cents believes that communication and transparency are the foundation of our relationship and continually strive to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Initial Filing

Common Cents is an established Registered Investment Advisor; however, this is the initial filing of the Disclosure Brochure pursuant to the new regulations.

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 Common Cents.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for Common Cents:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **153074** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (954) 769-0837 or by email at info@cc-wealth.com.

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Item 4 - Advisory Services

A. Firm Information

Common Cents Wealth Management, LLC ("Common Cents" or the "Advisor") is a Registered Investment Advisor with the State of Florida, which is organized as a Limited Liability Company (LLC) under the laws of the State of Florida. Common Cents is owned and operated by Jeremy C. Brinkmeier, Member and Chief Compliance Officer; and Martin D. Rosenthal, CFP®. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Common Cents.

B. Advisory Services Offered

Common Cents offers investment advisory services to individuals, high net worth individuals, trusts, estates, pension & profit sharing plans and corporations in Florida and other states (each referred to as a "Client").

Financial Planning and Consulting Services

Common Cents will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Common Cents may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. 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 effect the transaction through the Advisor.

Account Portfolio Management

Common Cents evaluates and selects mutual funds and exchange-traded funds for inclusion in Client portfolios only after applying their internal due diligence process. Common Cents employs a passive investment strategy that emphasizes diversification among many asset classes. Common Cents will work with the Client to determine an appropriate asset allocation. Asset allocation is a term used to refer to how an investor distributes investments among various classes of investment vehicles (e.g., stocks and bonds). This investment design should be based upon the investor's capacity for taking risk and involves taking the risk preferences, tax situations, and lifetime objectives of each client into account.

Our objective is to help investors develop customized portfolio solutions aimed at managing risks and costs.

See Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information on the Common Cents investment methods.

Common Cents' investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client. Common Cents will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Prior to rendering investment advisory services, Common Cents will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

Common Cents will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Common Cents accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Managed Account Programs

Common Cents may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. Common Cents will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add Common Cents' Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. The overall fee (including the Advisor's Investment Advisor Fee) will not exceed 3% annually.

Common Cents does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Common Cents's Investment Advisory Fee (described in Item 5).

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, Common Cents and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

Business Retirement Plans

Common Cents will work with business Clients to develop, design and implement a retirement savings plan for its employees. Common Cents provides objective financial advice to plan sponsors and senior management regarding issues involving benefit plan options, wealth accumulation strategies for employees and participant education. Common Cents will evaluate a sponsor's current plan and recommend changes, if necessary. Common Cents may also provide consulting regarding new plans for companies that have not previously offered retirement plan benefits.

C. Client Account Management

Prior to engaging Common Cents to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Common Cents, in connection with the Client, may develop a statement that summarizes the Client’s investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client’s stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – Common Cents will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Common Cents will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Common Cents will provide investment management and ongoing oversight of the Client’s portfolio and overall account. In certain cases, portfolio management will be provided by a managed account program selected by Common Cents and the Client.

D. Wrap Fee Programs

Common Cents does not manage a wrap fee program.

E. Assets Under Management

As of December 31, 2023, the most recent date for which such calculations are provided pursuant to securities regulations, Common Cents manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$79,300,000.00
Non-Discretionary Assets	\$8,700,000.00
Total	\$88,000,000.00

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 investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Common Cents and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid monthly in arrears pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar month. Investment Advisory Fees range from 1.00% to 0.50% based on the following schedule:

<u>Investment Advisory Services</u>	
Assets	Annual Fee
Up to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.75%
\$2,000,001 to \$4,000,000	0.50%
\$4,000,001 to \$6,000,000	0.25%
\$6,000,000 to 10,000,000	0.10%
\$10,000,000 & Up	0.00%

Investment Advisory Fees in the first month of service are prorated to the inception date of the account to the end of the first month. Fees may be negotiable at the discretion of Common Cents. The Client's fees will take into consideration the aggregate assets under management with Common Cents. All securities held in accounts managed by Common Cents will be independently valued by the designated Custodian. Common Cents will not have the authority or responsibility to value portfolio securities. The minimum fee is **\$1,000** for all accounts.

Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include Common Cents's Investment Advisory Fee above, plus the Program Sponsors Fee.

Financial Planning and Consulting Services

Common Cents offers financial planning or consulting services at \$200 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. Common Cents shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective month end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with Common Cents at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Common Cents to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than Common Cents, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by Common Cents is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Common Cents for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds 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), and a possible distribution fee. A Client could invest in these products directly, without the services of Common Cents, but would not receive the services provided by Common Cents which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Common Cents to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Advance Fees

Common Cents Clients pay advisory fees in arrears. This disclosure does not apply to Common Cents.

Termination

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

Common Cents does not buy or sell securities 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

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

Common Cents does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 - Types of Clients

Common Cents provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates - private investors, investing their personal assets
- Pension and Profit Sharing Plans - retirement plan sponsors or company plans
- Corporations and Businesses - taxable business entities, investing cash reserves

The relative percentage each type of Client is available on Common Cents's Form ADV Part 1. These percentages will change over time. Common Cents generally does not impose a minimum account size for establishing a relationship.

Common Cents generally requires a minimum account size of \$100,000 to effectively implement its investment process. This minimum may be waived at the sole discretion of Common Cents.

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

A. Methods of Analysis

Mutual Funds and Exchange-Traded Funds – Common Cents generally invests its Clients' assets with mutual funds and exchange-traded funds that pursue investment approaches that are diversified among multiple strategies, asset classes, regions, industry sectors and securities. Mutual funds and exchange-traded funds are selected primarily for their ability to replicate a given index or sector. The research of economists and academics will be used to evaluate an index or sector, and an appropriate fund selected to meet that research. Common Cents seeks passive investment options that provide low cost, tax efficient exposure to an asset class.

Bond Fund Due Diligence – Common Cents may invest Client assets with bond fund managers that may or may not pursue a passive investment strategy. In selecting a bond fund and allocating assets to that fund, Common Cents considers both quantitative and qualitative factors including:

- Relative performance during various time periods and market cycles
- Industry reputation
- Experience and training of staff investment professionals
- The clarity of, and adherence to, a viable investment philosophy
- Risk management process
- Portfolio management capabilities
- Fee structure
- Any other factor deemed appropriate by Common Cents

Common Cents may use various databases of information in order to facilitate the discovery process on each investment manager utilized by Common Cents.

B. Investment Strategies

Common Cents' analysis is based on research from leading economists and academics. This research suggests that investment returns are determined principally by asset allocation, not market timing or stock selection. Common Cents adheres to the following principles:

- Markets are efficient and, for investing purposes assets are fairly priced.
- Price risk factors determine the expected rate of return.
- Diversification reduces the risk of uncertainty and asset allocation in numerous sectors of the market principally determines results in the portfolio.

Common Cents' investment strategy is a hybrid of Modern Portfolio Theory and the Efficient Markets Hypothesis. The strategy entails passive investment management, which refers to a buy-and-hold approach to asset management. The practice of passive management is based on the belief that no one can time the market. Common Cents portfolio managers focus on the Client risk profile and determining an asset allocation that meets their needs.

As a passive investment manager, Common Cents uses diversity as its primary risk mitigation tool. The portfolio manager, based on a risk assessment of the individual and on historical investment performance data, selects a variety of funds from different assets classes. To the extent that these asset classes are non-correlated, the investor may experience market returns with mitigated risk. Additionally, investment-related costs are decreased for the investor as trades are kept at a minimum.

C. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Common Cents will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Common Cents primarily employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (954) 769-0837 or via email at info@cc-wealth.com.

Item 9 - Disciplinary Information

There are no legal, regulatory or disciplinary events involving Common Cents or any of its employees.

Common Cents and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **153074** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Jeremy C. Brinkmeier by selecting the Investment Adviser Representative and entering Jeremy C. Brinkmeier's Individual CRD# **5257306** in the field labeled "Individual CRD Number".

Item 10 - Other Financial Activities and Affiliations

The sole business of Common Cents and Jeremy C. Brinkmeier is to provide investment advisory services to its Clients. Neither Common Cents nor its advisory personnel are involved in other business endeavors. Common Cents does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

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

A. Code of Ethics

Common Cents has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Common Cents. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Common Cents and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of

Common Cents associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Common Cents has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (954) 769-0837 or via email at info@cc-wealth.com.

B. Personal Trading and Conflicts of Interest

Common Cents allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will Common Cents or any associated person of Common Cents, transact in any security to the detriment of any Client.

Item 12 - Brokerage Practices

A. Recommendation of Custodian[s]

Common Cents does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize Common Cents to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, Common Cents does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Common Cents does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by Common Cents. Common Cents may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. Common Cents does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Common Cents typically recommends to Clients that they established their brokerage account[s] at Institutional Services division of Charles Schwab & Company, Inc. ("Schwab"). Schwab is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Schwab offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Common Cents receives some benefits from Schwab through its participation in the program. Common Cents considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. Common Cents is not affiliated with, or related to, Schwab.

Following are additional details regarding the brokerage practices of the Advisor:

1. **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Common Cents does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

2. **Brokerage Referrals** - Common Cents does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. **Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Common Cents will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, Common Cents will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

B. 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 order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Common Cents will execute its transactions through an unaffiliated broker-dealer selected by the Client. Common Cents may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually 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 particular Client accounts.

Item 13 - Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Jeremy C. Brinkmeier. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result 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 Common Cents if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

A Client's risk tolerance may be re-evaluated if economic conditions cause portfolio performance that is outside their comfort level.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or 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[s]. 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 Common Cents

Common Cents is a fee-only advisor, who, in all circumstances, is compensated solely by the Client. Common Cents does not receive commissions or other compensation from product sponsors, broker dealers or any unrelated third party. Common Cents may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Common Cents may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

Common Cents has established an institutional relationship with the Institutional Services division of Charles Schwab & Company, Inc. ("Schwab") to assist the Advisor in managing Client account[s]. Access to the Schwab Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware; however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Schwab: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Client Referrals from Solicitors

Common Cents does not engage paid solicitors for Client referrals.

Item 15 - Custody

Common Cents does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Common Cents to utilize that custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 - Investment Discretion

Common Cents 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. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Common Cents. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Common Cents will be in accordance with each Client's investment objectives and goals.

Item 17 - Voting Client Securities

Common Cents will generally vote proxies on behalf of Clients. Exceptions are made for Clients who wish to vote their own proxies, or have retained the services of third-party to vote proxies on their behalf. Further, mutual funds retained by Common Cents may seek to vote proxies of portfolio holdings managed by that mutual fund. Common Cents has a fiduciary duty to act solely in the best interests of its Clients when exercising proxy voting authority. Common Cents will vote client securities in a timely manner and make voting decisions that are in the best interests of Clients.

Every effort is made to vote proxies in a way which Common Cents believes will maximize the monetary value of each portfolio's holdings.

Item 18 - Financial Information

Neither Common Cents, nor its management has any adverse financial situations that would reasonably impair the ability of Common Cents to meet all obligations to its Clients. Neither Common Cents, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Common Cents is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Item 19 - Requirements for State Registered Advisors

The Chief Compliance Officer and investment advisory representative of Common Cents is Jeremy C. Brinkmeier. Jeremy C. Brinkmeier is a dedicated Portfolio Manager for Client accounts of Common Cents.

A. Educational Background and Business Experience of Principal Officer(s)

Additional information regarding Jeremy C. Brinkmeier's employment history is included below.

Employment History:

Member/Chief Compliance Officer, Common Cents Wealth Management, LLC	04/2009 to Present
Operations Manager, Common Cents Wealth Management, LLC	09/2008 to 03/2009
Operations Manager, Investor Advisement Services	12/2004 to 08/2008
Operations Manager, Guardian Financial Inc.	08/2001 to 11/2004
Administrative Assistant, Florida Money Management, Inc.	07/1997 to 07/2001

B. Other Business Activities of Principal Officer

Jeremy C. Brinkmeier is a dedicated to the investment advisory activities of Common Cents's Clients. Jeremy C. Brinkmeier does not have any other business activities.

C. Performance Fee Calculations

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

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Common Cents or Jeremy C. Brinkmeier.

Neither Common Cents nor Jeremy C. Brinkmeier has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Common Cents or Jeremy C. Brinkmeier.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Common Cents or Jeremy C. Brinkmeier.***

However, we do encourage you to independently view the background of Jeremy C. Brinkmeier on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **5257306** in the field labeled "Individual CRD Number".

E. Material Relationships with Issuers of Securities

Neither Common Cents nor Jeremy C. Brinkmeier has any relationships or arrangements with issuers of securities.

An investment advisory representative of Common Cents is Martin D Rosenthal.

A. Educational Background and Business Experience

8/1982 - 12/1985 BA in Education - Trinity University

1/1999 - 1/2001 College For Financial Planning - CFP Education Program

5/2001 - Awarded Certified Financial Planner Designation by CFP Board of Standards

Employment History:

Investment Advisor, Common Cents Wealth Management, LLC	01/2011 to Present
Office Manager, Common Cents Wealth Management, LLC	09/2009 to 12/2010
Investment Advisor, Investor Advisement Services/Sunbridge Management, Inc.	12/2004 to 08/2008
Registered Representative, Lincoln Financial Securities Corporation	08/2008 to 12/2010
Investment Advisor, Guardian Financial Inc.	08/2001 to 11/2004
Registered Representative, Jefferson Pilot Securities Corporation	07/1999 to 07/2008
Administrative Assistant, Florida Money Management Group, Inc.	07/1997 to 08/2001

B. Other Business Activities

Martin D Rosenthal is a dedicated to the investment advisory activities of Common Cents's Clients. Martin D Rosenthal does not have any other business activities.

C. Performance Fee Calculations

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

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Common Cents or Martin D Rosenthal. Neither Common Cents nor Martin D Rosenthal has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Common Cents or Martin D Rosenthal.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery,

counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Common Cents or Martin D Rosenthal.*

However, we do encourage you to independently view the background of Martin D Rosenthal on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **3259869** in the field labeled "Individual CRD Number".

E. Material Relationships with Issuers of Securities

Neither Common Cents nor Martin D Rosenthal has any relationships or arrangements with issuers of securities.



Form ADV Part 2B – Brochure Supplement

for

**Jeremy C. Brinkmeier
Chief Compliance Manager**

Effective: May 7, 2013

This Brochure Supplement provides information about the background and qualifications of Jeremy C. Brinkmeier (CRD# **5257306**) in addition to the information contained in the Common Cents Wealth Management, LLC ("Common Cents" or the "Advisor" - CRD #153074) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Common Cents Disclosure Brochure or this Brochure Supplement, please contact us at (954) 769-0837 or by email at info@cc-wealth.com.

Additional information about Jeremy C. Brinkmeier is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

The Chief Compliance Officer of Common Cents is Jeremy C. Brinkmeier. Jeremy C. Brinkmeier, born in 1971, is a dedicated Portfolio Manager for Client accounts of Common Cents.

Additional information regarding Jeremy C. Brinkmeier's employment history is included below.

Employment History:

Member/Chief Compliance Officer, Common Cents Wealth Management, LLC	04/2009 to Present
Operations Manager, Common Cents Wealth Management, LLC	09/2008 to 03/2009
Operations Manager, Investor Advisement Services	12/2004 to 08/2008
Operations Manager, Guardian Financial Inc.	08/2001 to 11/2004
Administrative Assistant, Florida Money Management, Inc.	07/1997 to 07/2001

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Jeremy C. Brinkmeier. Jeremy C. Brinkmeier has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Jeremy C. Brinkmeier.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Jeremy C. Brinkmeier.*

However, we do encourage you to independently view the background of Jeremy C. Brinkmeier on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **5257306** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Jeremy C. Brinkmeier is a dedicated to the investment advisory activities of Common Cents' Clients. Jeremy C. Brinkmeier does not have any other business activities.

Item 5 – Additional Compensation

Jeremy C. Brinkmeier does not receive any additional forms of compensation.

Item 6 – Supervision

Jeremy C. Brinkmeier serves as the Chief Compliance Officer and advisory representative of Common Cents. Jeremy C. Brinkmeier can be reached at (954) 769-0837.

Common Cents has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Common Cents. Further, Common Cents is subject to regulatory oversight by various agencies. These agencies require registration by Common Cents and its employees. As a registered entity, Common Cents is subject to examinations by regulators, which may be announced or unannounced. Common Cents is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Martin D. Rosenthal
Investment Advisor
Representative**

Effective: January 1, 2011

This Brochure Supplement provides information about the background and qualifications of Martin D. Rosenthal (CRD# **3259869**) in addition to the information contained in the Common Cents Wealth Management, LLC ("Common Cents" or the "Advisor" - CRD #153074) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Common Cents Disclosure Brochure or this Brochure Supplement, please contact us at (954) 769-0837 or by email at info@cc-wealth.com.

Additional information about Martin D. Rosenthal is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Investment Advisor Representative of Common Cents is Martin D. Rosenthal, born in 1964, is a dedicated CFP for clients of Common Cents.

Additional information regarding Martin D. Rosenthal's employment history is included below.

A. Educational Background and Business Experience

8/1982 – 12/1985 BA in Education – Trinity University

1/1999 – 1/2001 College For Financial Planning – CFP Education Program

5/2001 – Awarded Certified Financial Planner Designation by CFP Board of Standards

Employment History:

Investment Advisor, Common Cents Wealth Management, LLC	01/2011 to Present
Office Manager, Common Cents Wealth Management, LLC	09/2009 to 12/2010
Investment Advisor, Investor Advisement Services/Sunbridge Management, Inc.	12/2004 to 08/2008
Registered Representative, Lincoln Financial Securities Corporation	08/2008 to 12/2010
Investment Advisor, Guardian Financial Inc.	08/2001 to 11/2004
Registered Representative, Jefferson Pilot Securities Corporation	07/1999 to 07/2008
Administrative Assistant, Florida Money Management Group, Inc.	07/1997 to 08/2001

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Martin D. Rosenthal has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Martin D. Rosenthal.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Martin D. Rosenthal.*

However, we do encourage you to independently view the background of Martin D. Rosenthal on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **3259869** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Martin D. Rosenthal is a dedicated to the investment advisory activities of Common Cents' Clients. Martin D. Rosenthal does not have any other business activities.

Item 5 – Additional Compensation

Martin D. Rosenthal does not receive any additional forms of compensation.

Item 6 – Supervision

Martin D. Rosenthal serves as an advisory representative of Common Cents. Martin D. Rosenthal can be reached at (954) 769-0837.

Common Cents has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Common Cents. Further, Common Cents is subject to regulatory oversight by various agencies. These agencies require registration by Common Cents and its employees. As a registered entity, Common Cents is subject to examinations by regulators, which may be announced or unannounced. Common Cents is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 12, 2015

Our Commitment to You

Common Cents Wealth Management, LLC ("Common Cents") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Common Cents (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Common Cents provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Common Cents Shares

Common Cents works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Common Cents's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help

administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Common Cents does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (954) 769-0837 or via email at info@cc-wealth.com.

Privacy Policy

Effective: March 12, 2015

Our Commitment to You

Common Cents Wealth Management, LLC ("Common Cents") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Common Cents (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Common Cents provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Common Cents Shares

Common Cents works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Common Cents's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help

administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Common Cents does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

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Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (954) 769-0837 or via email at info@cc-wealth.com.