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Form ADV Part 2A  
March 30, 2024

This brochure provides information about the qualifications and business practices of WealthTrust Axiom, LLC (“Axiom Asset Management” - also referred to throughout this document as “Axiom”). If you have any questions about the contents of this brochure, please contact David Webster at 610-688-0050. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Additional details about Axiom Asset Management also is available on the (SEC’s) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Axiom Asset Management is a registered investment adviser with the SEC. The registration of an Investment Adviser does not imply any level of skill or training. Our oral and written communications will provide you with the information about us you need to fully understand Axiom Asset Management and its investment advisory role in managing our client's assets.

## Item 2: Material Changes

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This section only discusses any material changes to our Form ADV Part 2A disclosure document from the date of our 2023 annual update to this brochure, March 31, 2023, through the date of our 2023 yearly update, March 29, 2024.

During this period, there were no material changes.

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## Item 4: Advisory Business

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### History

Axiom Asset Management (“*Axiom*”) was formed in 2003 by Michael C. Heaberg, Chief Executive Officer; Robert Loreaux, Executive Vice President; and Albert Matt, President.

In 2007, WealthTrust LLC bought a financial stake in Axiom Asset Management. WealthTrust LLC, a Scottsdale, Arizona-based holding company, was a strategic financial partner for U.S.-based investment management firms that provided comprehensive wealth management services to individuals and families. WealthTrust strengthened each affiliate by providing execution and support in compliance and back-office services.

On May 31, 2017 WealthTrust LLC sold their financial stake to *Hightower* Holding LLC performing back-office like functions and other support.

Axiom Asset Management's principal owners are *Hightower Advisors, LLC*, Michael Heaberg, Robert Loreaux, Albert Matt, and Craig Rose.

Unchanged through our history, Axiom Asset Management was formed to provide investors with a distinctive investment approach. In our view, most investment firms are plagued by competing agendas that sap energy and creativity that should be directed toward solving problems and building wealth for clients. Axiom Asset Management is structured to allow a single-minded focus on our clients’ success.

### Business

WealthTrust Axiom, also known as Axiom Asset Management, has the principal business of furnishing “investment advisory services” to clients. Axiom Asset Management is structured to allow a single-minded focus on our clients’ success. This activity includes providing continuous advice concerning the investment of monies consistent with each client's circumstances, preferences, and objectives.

The investment management process includes an assessment of each client’s objectives, needs, restrictions, and portfolio holdings. We attempt to structure each client’s investment portfolio in the context of these considerations.

Axiom Asset Management’s investment philosophy is based upon:

- **Customized and Personal** - Our relationships begin with extensive profiling of each client’s investment attitudes and objectives. Using fundamental principles, we build and manage a family’s household of assets according to their unique balance of growth, income, and tax minimization. The client may request restrictions on our ability to implement particular investments or strategies if that is the client’s preference. Axiom Asset Management’s clients have direct access to our experienced portfolio managers for ongoing discussions of their changing needs and portfolio allocations.
- **Value, Growth, Contrarian, and Opportunistic** - We seek to find value and minimize risk by using rigorous and diligent research, often among “out of favor & reasonably valued” companies or industry sectors using rigorous and diligent research, often among “out of favor & reasonably valued” companies, industry sectors, and/or companies with compelling sales and earnings growth. Focusing on company fundamentals and quality, we believe our approach has been successful in rising markets and, perhaps more importantly, in stagnant or declining markets with our use of cash as a hedge.
- **Experienced Personnel**—In our view, there is no substitute for investment experience. Both our investment and operational staff average over 20 years of working with individuals and families to achieve investment success.

Our investment management services consist primarily of discretionary asset management, under which we determine and implement investment and reinvestment decisions on behalf of the client through the use of equity, fixed income (ultra-short, short-term, intermediate, and long-term), and balanced (between equity securities such as stocks and fixed income securities such as municipal or government bonds) portfolios.

Axiom Asset Management allocates its clients' investment management assets, on a discretionary or non-discretionary basis, among individual equity and bond securities, mutual funds, and exchange-traded funds in accordance with their investment objectives.

Axiom does not receive fee compensation through front-end loads or 12b-1 fees for RIA fee business if mutual funds are used.

Where deemed appropriate for a client's investment objectives, Axiom Asset Management may engage a third-party investment manager on a sub-advisory basis to provide investment management services to the client in asset classes such as fixed income. These third-party investment management services are subject to review by the firm.

Axiom Asset Management investment advisory services are generally executed through discretionary management of investment portfolios in accordance with the client's investment objective(s) and subject to any investment restrictions imposed or added by the client and applicable regulatory restrictions. Clients may also engage Axiom Asset Management investment advisory services on a non-discretionary basis at their request.

**Financial Planning:** *Axiom* may provide consulting services on investment-related matters for which we may or may not receive additional compensation. Such planning may or may not include:

- Retirement Planning
- Education Planning
- Insurance and Risk Management Planning
- Asset Allocation and Portfolio Analysis
- Cash Flow Analysis
- Estate Planning in coordination with a client's attorney and CPA. *Axiom* does not provide tax or legal advice or prepare such related documents.

*Axiom* may provide pension consulting services to employee benefit plans and their fiduciaries by providing education and an analysis of the needs of the plan, including the type of securities or investments that may be included as investment options for the plan participants. *Axiom* will also assist in performance monitoring & general plan communication. Services generally include client assistance with developing long-term financial objectives, determining risk tolerances, and educational advice in selecting asset allocations. Axiom Asset Management does not act as a Plan Sponsor or Administrator of retirement plans. Axiom's role is as an advisor to the plan trustees or Plan Sponsor.

The dollar amount of client assets we manage on a discretionary basis as of:

**12/31/2023 = \$581,589,958**

The dollar amount of client assets we manage on a non-discretionary basis as of

**12/31/2023 = \$146,559,246**

## Item 5: Fees and Compensation

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Axiom Asset Management is only compensated for its investment advisory services by charging the client a Management Fee based on the market value of your assets under our management and based upon the fee schedule set forth below. Should a Sub-Advisor be used, their fee is incorporated into the Axiom Asset Management fee. Axiom will pay the Sub-Advisor directly from our accounts using the standard fee schedule described below.

Clients and prospective clients may also engage certain employees of Axiom Asset Management for a non-advisory brokerage-only arrangement in their sole capacity as registered broker-dealer representatives. Please refer to the section see *Item 10 on Other Financial Industry Activities and Affiliations* for more information on this arrangement.

If the client determines to engage Axiom Asset Management to provide investment advisory services (discretionary or non-discretionary), the client may do so on a fee-only basis. If engaged, *Axiom* shall charge an annual fee based upon a percentage of the market value of the assets being managed by Axiom Asset Management. *Axiom's* annual fee shall be charged quarterly, *in arrears*, based on the market value of the assets on the last business day of the previous quarter. The investment vehicles Axiom uses are traded on public exchanges with daily valuations. The portfolio valuations are retrieved from our custodian's (*Fidelity*) data feed. The annual fee shall vary depending upon the market value of the assets under management and the type of investment management services to be rendered, as follows:

### Fee Schedule

#### Value of Household Portfolio

#### Annual Fee

#### Equity Portfolios

Assets below \$250,000

Up to 1.25%

Assets below \$2,500,000

Up to 1%

Assets above \$2,500,000

Negotiable

#### Fixed Income Portfolios

Assets over \$100,000

Up to .70%

The first quarter's fees shall be calculated pro rata for the initial quarter of investment advisory services. The *Management Agreement (Agreement)* between Axiom Asset Management and the client will continue in effect until terminated by either party according to the terms of the *Agreement*. Axiom Asset Management's annual fee shall be prorated through the termination date and charged to the client immediately. Axiom Asset Management does not impose an account minimum for starting or maintaining an account.

Axiom Asset Management, in its sole discretion, may waive, negotiate, or charge a reduced management fee based upon specific criteria (i.e., anticipated future earning capacity, anticipated future additional assets, the dollar amount of assets to be managed, related accounts, account composition, pre-existing client, pro bono activities, high cash balances during the building of new portfolios, etc.) for clients. Employees may also receive services for a reduced or no fee.

Axiom Asset Management has always considered the accuracy of client fees extremely important. The client fee amount is calculated by multiplying the agreed-upon percentage of the closing quarter-end portfolio value. We utilize an eight-step procedure to calculate the fees every quarter. This includes multiple levels of review by various personnel, including compliance, operations, and investment managers.

#### Highlights of 8-Step Fee Calculation

1. Receive quarter-end values from *Fidelity*
2. Multiply agreed upon annual fee amount percent and divide by 4 (quarter)
3. Cross-check for any pro-rata billings and adjustments
4. Have advisors review households for accuracy
5. Spot-check random accounts with hand calculation
6. Confirm available cash balance for deductions or send out invoices for accounts paying by check
7. Outside manager fees included if applicable
8. Deduct the quarterly fee from the Fidelity account or send an invoice to those paying by check.

**Other Costs:** The above-referenced fee schedule does not include custody fees, brokerage commissions or fees, or other costs or charges associated with securities transactions with or through a broker-dealer, including dealer mark-ups or mark-downs in principal transactions, stock exchange fees (domestic or international for both investment advisor or brokerage), transfer taxes, or other charges mandated by law, all of which will be separately charged to the client by our custodian. Please refer to the Item 12 Brokerage Practices section for more information on our brokerage practices.

Axiom Asset Management's investment management fee generally includes any investment-related consulting services. However, Axiom Asset Management may charge a separate fee for investment-related consulting services for non-investment management clients and investment management clients who require a disproportionate amount of consulting services. The fees shall be agreed upon before rendering the consulting services in these limited circumstances.

Clients should understand that, in addition to the annual fee charged by Axiom Asset Management, any mutual funds, including exchange-traded funds, in which assets are invested will incur separate investment management fees and other operating expenses (as described in each fund's prospectus, typically referred to as "*management expense ratio*") for which the client will incur a proportionate share.

**Agreement Terms:** Axiom Asset Management's *Agreement* authorizes Axiom Asset Management through our custodian, *Fidelity Investments*, to debit the client's account for the amount of Axiom Asset Management's fee and to directly remit that management fee to Axiom Asset Management in accordance with applicable custody rules. However, as an accommodation for clients who wish to pay their fee from personal funds, we will invoice them so they may send a check. You will receive a periodic statement from your custodian, including the amount of the Management Fee sent to us. It is essential that you confirm the accuracy of our Management Fee calculation upon receipt of your custodian's statement.

Axiom Asset Management's clients are advised to promptly notify us if there are ever any changes in their financial situation or investment objectives or if they wish to impose reasonable restrictions upon our management services. To more thoroughly assist clients with managing their portfolios, it would be prudent for the client to share their total financial picture and detail their objectives for each portfolio should the individual parts have objectives and constraints that may differ from the whole. Axiom seeks to manage based on the complete financial list of assets, familial circumstances, and personal goals.

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

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*Axiom* does not accept performance-based fees of any kind.

## Item 7: Types of Clients

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Axiom Asset Management provides portfolio management services to individuals, high-net-worth individuals, corporate pension and retirement plans, trusts, estates, corporations, and other business entities other than those listed above.

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

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Our primary methods of analysis include fundamental, technical, cyclical, and quantitative analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and the analysis of management and competitive advantages. This information is used to forecast trends in areas such as earnings per share and revenue growth. There is no guarantee that past financial trends will continue in the future.

**Technical analysis** involves analyzing past market data, primarily price and volume, for trends and market accumulation/distribution, primarily by large financial institutions. Past or present trends may or may not persist.

**Cyclical analysis** involves analyzing business cycles to find favorable conditions for buying and/or selling a security. Cyclical stock's performance and profitability are generally highly sensitive to economic cycles or seasonality. Some examples of cyclical industries are consumer discretionary, travel and leisure, construction and real estate, and manufacturing and industrials. There are times when cycles may be repeated.

**Quantitative analysis** involves mathematical and statistical analysis, looking for correlations to the market or peers or valuation analysis using ratios based on historical ratios or comparisons to peers. The effectiveness of these measures may change over time as correlations change or are impacted by external market events.



## Market Risks

Portfolios are exposed to *Market Risk*. The price of a security, bond, exchange-traded or mutual fund may drop due to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances.

**Geopolitical Risk**—This involves risk related to political and social events such as a terrorist attack, war, pandemic, or elections that could impact financial markets. Such events, whether actual or anticipated, can affect investor attitudes and outlooks, resulting in system-wide fluctuations in stock prices.

**Country Risk** — The risk of events in the country where an investment is made could impact general market sentiment. This can occur when a country overhauls its government, changes policies, or experiences social unrest or war.

**Currency Risk** — Any change in the exchange rate between two relevant currencies can increase or reduce your investment return.

**Interest Rate Risk** — This is the risk that the value of a security can fluctuate due to changes in interest rates. Interest rate changes directly affect bonds — as interest rates rise, the price of a previously issued bond falls; conversely, when interest rates fall, bond prices increase. The rationale is that a bond promises a future stream of payments; an investor will offer less for a bond that pays out at a rate lower than the rates provided in the current market. The opposite also is true. Interest rates can also impact the cost of borrowing, which can help or hinder growth opportunities within companies. Higher rates can also increase equities' competition with bonds.

**Inflation Risk (or Purchasing Power Risk)** — Inflation risks money's purchasing power and investments' value. When the general price level of goods and services increases, money buys less, reducing purchasing power. Inflation also tends to lead to higher interest rates, negatively impacting economic growth and corporate profits. During periods of low inflation, new bonds may offer lower interest rates, causing investors to turn to higher-risk bonds with higher rates. However, as inflation rises, so do interest rates, which can slow economic growth and reduce corporate profits. For example, in the 1970s, the United States experienced a period of high inflation, which led to a sharp increase in interest rates, causing a recession in the early 1980s.

**Liquidity Risk** — The risk that you won't be able to buy or sell investments quickly for a price that tracks the true underlying value of the asset or that you won't be able to sell the investment at all because of a lack of buyers in the market.

**Legal Remedies Risk** — If you have a problem with your investment, you may not have adequate legal means to resolve it. When investing in an international market, you often have to rely on the legal measures available in that country to resolve problems. These measures may differ from those you may be used to in the US.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## Portfolio Management Process

Axiom Asset Management conducts its portfolio management process based on the completed "*Client Household Profile*," which the client annually updates. The profiles are sent out for client review for changes or confirmation. If there are changes, the client will send back the marked-up changes. If there are no changes, the client can send back the form noted as no change or *exercise negative consent, which means that if Axiom Asset Management is not notified or the profile is not sent back, it is agreed as current and accurate until further notice.*

These profiles consist of annual household income, tax bracket, total net worth, investment experience, time horizon, income needs and sources, risk attitude, and financial objectives. These profiles, along with general conversations throughout the year, help the advisors build and adjust portfolios based on the factors listed above.

Our client portfolios factor in the personal profiles, market conditions, liquidity of individually traded securities, client cash flow needs, and tax implications. Such tax implications based on one's tax bracket could consist of one or more of the following: balancing the withdrawal of funds used from retirement accounts taxed as ordinary income tax rates as opposed to capital gains or the taxation of bonds (corporate, municipal, or US Treasuries, or certificates of deposit) at the Federal, State & Local levels. Portfolio adjustments are made according to the above-listed factors and situations.

For those clients to whom Axiom Asset Management provides investment management services with a Sub Advisor, account reviews are conducted on an annual basis, including a review of benchmarks for each account and account performance. The firm will send a due diligence questionnaire annually to the sub-advisors that we utilize.

#### *Selection of Sub-Advisers*

When using a sub-advisor, Axiom will gather information about the client's financial situation, investment objectives, and risk tolerance; we will make recommendations regarding the suitability of the investment style of a particular third-party investment adviser, or more than one and, if acceptable, the client will then engage the services of the third-party investment adviser directly. Following the selection of the particular third-party investment adviser, we will monitor their performance so that their style and performance remain aligned with the investment goals and objectives of the client.

#### **Retirement Rollovers—No Obligation**

Clients or future clients have several options when managing their previous 401K plans, IRAs, or other qualified accounts. If permitted, they may leave their 401K plan with a previous employer, roll over into the new employer, or roll over into a new or existing IRA account.

There may or may not be advantages to an employer's plan. Below are possible situations to consider:

- Whether lower investment costs (e.g., whether there is advantageous share class, institutional pricing)
- Whether the employer covers administrative fees
- Whether greater creditor protection
- Whether Age 55 exception to early distribution policy if the client is under 59 1/2
- Delayed RMD availability in the plan if the client is employed after 73
- Loan availability
- Brokerage window
- Company stock tax treatment

Service/functionality advantages of an IRA to take into consideration:

- Wider range of investment options
- Availability of discretionary management
- Asset allocation advice
- Retirement income and holistic financial planning services
- Distribution payout options (for self or beneficiary)
- Beneficiary designation options

Additional considerations, if applicable:

- Fees and expenses of an employer's plan versus an IRA
- Suitability - must consider the customer's investment profile, including the customer's age, other investments, financial situations and needs, tax status, investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, and any other disclosed information

## Item 9: Disciplinary Information

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There have been no criminal or civil actions against Axiom Asset Management or its personnel. Furthermore, neither Axiom Asset Management nor any of its personnel has had any violations of investment-related statutes or regulations.

## Item 10: Other Financial Industry Activities and Affiliations

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### Brokerage and Insurance Affiliations

Certain employees of Axiom Asset Management (Michael Heaberg and David Webster) are licensed as registered representatives of Purshe Kaplan Sterling Investments (“PKS”). If a client desires, they may provide brokerage investment services under a commission-based arrangement separate and distinct from the services provided by Axiom Asset Management. Under this arrangement, the brokerage customer will be a client of PKS only and not a client of Axiom Asset Management. This arrangement is provided infrequently as an accommodation service for clients or potential clients of Axiom Asset Management upon request. PKS only acts as a broker and is not affiliated with Axiom Asset Management or involved with the advisory business of Axiom Asset Management. PKS charges brokerage commissions on these brokerage transactions, and PKS will pay a portion of these commissions to the employees referenced below in their separate capacities as registered representatives of PKS.

Before a transaction can be made, the brokerage customer must enter into an account agreement with PKS. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers. In addition, the employees referenced above may also receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that the brokerage customer maintains the mutual fund investment made through PKS.

Axiom Asset Management does not recommend or provide the preceding brokerage arrangement as a service. It does not consider the arrangement involving the identified employees to be a conflict of interest with its advisory clients on its behalf or on behalf of its employees, nor does it believe that it gives its employees an incentive to recommend investment products based on the compensation received rather than on the needs of a client.

The brokerage customer can obtain brokerage investment services from any other brokerage firm or registered representatives.

Our employee, David Webster, is independently licensed to sell insurance products to clients of Axiom Asset Management should a situation arise. Various insurance companies are offered through PKS and may be requested by a client occasionally. When acting as an insurance agent, Mr. Webster will receive commissions for selling insurance products and, as such, may be incentivized to recommend such insurance products based on their receipt of

remuneration rather than the client's best interest. However, Axiom Asset Management believes any such conflict of interest with our advisory clients is resolved by his fiduciary obligation to act in the best interest of our clients and by disclosure of this conflict.

### **Affiliated Firms**

Axiom Asset Management is affiliated through common ownership with *Hightower Advisors, LLC* ("Hightower"), an investment adviser registered with the Securities and Exchange Commission, and *Hightower Securities, LLC*, a broker-dealer registered with the Securities and Exchange Commission. *Hightower Securities, LLC* is also a licensed general insurance broker. *It is a member of FINRA* and SIPC and is registered in various states as required.

*Hightower* primarily provides Axiom with back-office support such as payroll, benefits management, and, in some cases, leveraging their volume discounts with vendors, where applicable. Through *Hightower's* partial ownership and services provided, *Hightower Advisors, LLC* receives compensation as part of its ownership stake.

The following firms are also affiliated with Axiom Asset Management based on a shared ownership interest through our majority owner, *Hightower Advisors, LLC*:

<u>Entity Name</u>	<u>CRD</u>	<u>SEC #</u>
Delta Asset Management	113688	801-60492
Duncker Streett	110828	801-58224
Grant Tanai Barash & Altman LLC	319128	801-127101
Harvey Investment Company	110482	801-58031
Hightower Advisors	145323	801-69625
Hightower Securities	116681	801-53560
Hightower Trust Services LTA	CIK Number = 1090413	
Kanawha Capital Management	118458	801-60800
Madison Avenue Financial Solutions, LLC	307461	801-118936
The Rikoon Group, LLC	131435	801-63095

However, Axiom Asset Management does not have a relationship or arrangement with any of these affiliated firms that are material to our business or clients.

## Item 11: Code of Ethics, Participation in Transactions, Personal Trading

Axiom Asset Management has adopted a written *Code of Ethics* under which all of our employees are obligated to comply with certain trading restrictions in their personal accounts to avoid conflicts of interest with transactions conducted in client accounts.

Axiom Asset Management and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided
- The duty to obtain the best execution for a client's transactions where *Axiom* is in a position to direct brokerage transactions for the client

- The duty to ensure that investment advice is suitable for meeting the client’s individual objectives, needs, and circumstances
- A duty to be loyal to clients

Our employees may buy or sell the same securities that we recommend that our clients invest in or that we purchase or sell at the request of our clients. This presents a conflict of interest between our employees’ own financial interests and the best interests of our clients. We have addressed this conflict of interest by imposing trading restrictions under the *Code of Ethics* referenced above, which include restrictions on our employees’ personal trading based upon investment activity occurring in, or being contemplated for, our clients’ accounts under which our employees are generally obligated to buy or sell securities in their personal accounts simultaneously with, or after completion of, purchase or sale of the same security in our clients’ accounts subject to certain exceptions.

The *Code of Ethics* also requires that all of Axiom Asset Management’s personnel (called “*Supervised Persons*”) report their personal securities holdings and transactions to the Chief Compliance Officer and obtain pre-approval of specific investments such as initial public and limited offerings. Axiom Asset Management has adopted the following principles governing personal investment activities by supervised persons:

- Axiom Asset Management’s policy and practice is to NOT engage in any principal transactions.
- Clients may contact Axiom Asset Management to request a copy of its *Code of Ethics*.
- Axiom Asset Management’s written *Code of Ethics* covers the following areas:
  - Standards of Business Conduct
  - Interested Transactions
  - Prohibition Against Insider Trading
  - Personal Securities Transactions
  - Gifts and Entertainment
  - Protecting the Confidentiality of Client Information
  - Compliance Procedures
  - Certification
  - Record retention and security
  - Reporting Violations and Sanctions
  - Use of block trades to manage best execution

## Item 12: Brokerage Practices

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Axiom Asset Management considers the following factors in selecting or recommending brokerage firms for our clients’ transactions and in determining the reasonableness of the compensation or other remuneration paid to the brokerage firms:

- Quality of Support Services and Technology Provided
- Trade Implementation Costs
- Value of Various Information Provided
- Market Liquidity
- Confidentiality of Trading Intentions

- Client Oriented Culture
- Financial Stability
- Ability to Execute Difficult Trades

We periodically review our brokerage practices and the reasonableness of compensation and other remuneration paid to brokerage firms and monitor our efforts to seek the best execution of client transactions.

*Fidelity Investments* enables Axiom Asset Management to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and transaction fees charged by *Fidelity Investments* may be higher or lower than those charged by other broker-dealers.

### **Software and Support Provided by *Fidelity Investments***

Axiom Asset Management has an arrangement with National Financial Services LLC and *Fidelity* Brokerage Services LLC (collectively, and together with all affiliates, "*Fidelity*") through which *Fidelity Investments* provides Axiom Asset Management with "institutional platform services." The institutional platform services include, among others, brokerage, custody, and other related services. *Fidelity's* institutional platform services that assist us in managing and administering our clients' accounts include software and other technology through Fidelity.com that (i) provide access to client account data (such as trade confirmations and account statements), (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing, and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping, and client reporting.

*Fidelity Investments* offers other services to assist Axiom Asset Management in managing and developing its advisory practice. Such services include but are not limited to, third-party research and publications, access to educational conferences, roundtables, and webinars, practice management resources, and access to consultants and other third-party service providers who provide a wide array of business-related services and technology with whom we may contract directly.

Axiom Asset Management is independently operated, owned, and not affiliated with *Fidelity Investments*.

*Fidelity* generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through *Fidelity*, or that settle into *Fidelity* accounts (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions – i.e., international). *Fidelity* provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

*Fidelity* provides Axiom Asset Management with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

### **Block Orders**

Axiom Asset Management may group or block orders from time to time for the same security for more than one client account to execute the orders. This is what is known as a "block transaction." This process can create trading efficiencies, prompt attention to the order, and improve price execution since the block transaction may be executed at various prices but averaged as one price. Therefore, clients whose transactions are part of the block transaction will receive the same average price and trading costs. Personal transactions of our employees are not included in such block transactions when both client and Axiom employee are buying the same stock on the same day. This helps to ensure the best execution for the client.

### **Cross Trades**

Axiom Asset Management does not execute them.

## Directed Brokerage

Axiom Asset Management does not permit clients to direct brokerage transactions to a specific brokerage firm.

## Trade Errors

As fiduciaries, investment advisers must put their client's interests ahead of their own. This duty is especially evident when correcting errors when placing trades for client accounts.

1. Advisers know the following restrictions on trading errors: When an adviser makes and corrects a mistake, the client must not be disadvantaged, i.e., the client must be "made whole."
2. Advisers must review their supervisory procedures to ensure that procedures for correcting trading errors are in place. In addition, trading practices should periodically be reviewed to determine that the firm's procedures are being followed. To this end, the Chief Compliance Officer (CCO) maintains a file documenting the correction of trading errors. The creation of such a file allows the CCO to periodically review all trading errors for a particular period to ensure they were handled quickly and correctly.

The suitability of a trade error also factors into its resolution. Unsuitable trades must always be resolved in the client's favor, with the client being made whole and errors being determined on a case-by-case basis. Errors may also include compensating a client for any loss on a mistake. Neither the client nor *Axiom* will benefit from the error. Any gains are donated to charity, and *Axiom* absorbs the losses.

## Item 13: Review of Accounts

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For those clients to whom Axiom Asset Management provides investment management services, account reviews are conducted by the investment adviser (account manager), who is responsible for the management of the particular client's accounts.

As a general ongoing process, *Axiom* is actively engaged in the accounts, whether through general trading activity or other miscellaneous activity, such as phone calls, mailings, and notifications originating from the custodian or notifications required to meet compliance.

Regarding trading activity, since *Axiom* primarily uses independent securities in the portfolios, the frequency of buying and selling may dictate more frequent reviews of clients' portfolios due to the higher trading activity.

Axiom Asset Management does not, as a general policy, provide our clients with regular or periodic written reports concerning their accounts. However, upon request, our clients will receive a written report that may include relevant account and market-related information, such as an inventory of account holdings. Much of the account information is expected to be provided by the custodian (*Fidelity Investments*) (see information under *Item:15 Custody* for more details).

All investment advisory clients are encouraged to regularly inform *Axiom* of changes to their needs, goals, and objectives.

## Item 14: Client Referrals and Other Compensation

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Axiom Asset Management does not compensate or receive compensation for client referrals, attorneys, accountants, business valuation companies, etc. For more information on other economic benefits we receive from a non-client, please refer to the section on Brokerage Practices contained herein.

## Item 15: Custody

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All financial assets, including stocks, bonds, and cash, are held by a custodian. *Fidelity Investments*, a qualified custodian, is our primary custodian; others are used on a situation-specific basis. In addition to any account information you may receive from us as described above in the section on Review of Accounts, you should expect to receive account statements directly from your custodian on at least a quarterly basis. However, you may receive them every month. You should carefully review these statements and compare these statements to statements you receive from us for any discrepancies. It would be best to remember that the statements you receive from your custodian are the official record of your accounts and assets for tax purposes.

Axiom Asset Management's Agreement authorizes *Axiom*, through our custodian *Fidelity Investments*, to debit the client's account for the amount equal to Axiom Asset Management's fee agreement with the client and to directly remit that management fee to Axiom Asset Management in accordance with applicable custody rules.

## Item 16: Investment Discretion

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We will accept discretionary investment authority over your assets if you agree to such an arrangement, as stated in *Item 4 Advisory Business*. This is typically accomplished by executing a limited trading authority in your client agreement with us. When implementing your client agreement with us, you can further limit the extent of discretionary investment authority to be granted to us. However, this may impact the level of service we can provide you.

## Item 17: Voting Client Securities

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Axiom Asset Management does not accept the authority to vote for client securities on behalf of its clients and does not provide advice on how to vote for them. Clients will receive proxies directly from the security issuer or our custodian. We will not take any action or advise on investments in your accounts that become subject to class actions, related litigation, or other matters such as mergers, acquisitions, tender offers, bankruptcy proceedings, or other similar events. However, we may provide you limited assistance upon request on an informal basis.

## Item 18: Financial Information

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Axiom Asset Management has no financial commitment that will impair its ability to meet client contractual and fiduciary obligations and has not been the subject of a bankruptcy proceeding.



# Axiom Asset Management

550 E Swedesford Road, Suite 110

Wayne PA 19087

610 688-0050

877 294-6699 (toll free)

[www.axiomasset.com](http://www.axiomasset.com)

Form ADV Part 2B

March 30, 2024

This information about the supervised persons listed below supplements our ADV Part 2A, the Axiom Asset Management “Firm Brochure.” Please get in touch with David Webster at 610-688-0089 if you did not receive Axiom Asset Management’s firm brochure or have any questions about the supplement's contents.

“*Supervised Persons*” within Axiom Asset Management covered by this brochure supplement are identified as persons who (i) formulate investment advice for clients and have direct client contact or (ii) make discretionary investment decisions for clients’ assets, even if the supervised person has no direct client contact.

<b>Albert Matt</b>	<b>610 688-0052</b>	<b>President/Managing Director</b>
<b>Michael C. Heaberg</b>	<b>610 688-0053</b>	<b>Chief Executive Officer, Branch Mgr., Managing Director</b>
<b>Robert Loreaux</b>	<b>610 688-0051</b>	<b>Managing Director</b>
<b>Craig Rose</b>	<b>610 688-0054</b>	<b>Managing Director</b>
<b>David Webster</b>	<b>610 688-0089</b>	<b>Chief Compliance Officer/Investment Adviser Representative</b>

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

## Form ADV Part 2B - Item 2 -Educational Background and Business Experience

**Supervised person: ALBERT C. MATT**

Post-Secondary Education:

Born 1945

University of Pennsylvania – 1967, BA

University of Pennsylvania – 1970, MA

Recent Business Background:

WealthTrust Axiom, LLC, President, 11/2007 – Present

Purshe Kaplan Sterling Invest, Registered Representative, 06/2003 –12/2011

Axiom Asset Management, LLC, President, 02/2003 – 10/2007

Rubicon Asset Management, President, 05/1995 – 03/2003

Rubicon Securities, Registered Representative, 05/1995 – 03/2003

## Form ADV Part 2B - Item 3 - Disciplinary Information

There are no legal or disciplinary actions to report for Albert C Matt.

## Form ADV Part 2B - Item 4 - Other Business Activities

Albert C Matt is currently not actively engaged in any other investment-related business.

## Form ADV Part 2B - Item 5 - Additional Compensation

Albert C Matt receives compensation for providing advisory services solely from his responsibilities at Axiom Asset Management. He gets no additional economic benefit from third parties that offer advisory services.

## Form ADV Part 2B - Item 6 - Supervision

Our firm has written supervisory procedures in place, which include annual account reviews by the firm’s supervised persons. These procedures are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations and to monitor the advice being provided to the firm’s clients. Albert is a member of senior management and, as such, has no direct supervisor.

\* \* \*

## Form ADV Part 2B - Item 2 -Educational Background and Business Experience

**Supervised person: MICHAEL C. HEABERG**

Post-Secondary Education:

Born 1958

Vanderbilt University – 1980, BS

Recent Business Background:

WealthTrust Axiom, LLC, CEO, 11/2007 - Present

Purshe Kaplan Sterling Invest, Registered Representative, 06/2003 – Present

Axiom Asset Management, LLC, Managing Director, 06/2003 – 10/2007  
PaineWebber Incorporated, Vice President, 05/1995 – 06/2000

### Form ADV Part 2B - Item 3 - Disciplinary Information

There are no legal or disciplinary actions to report for Michael C. Heaberg.

### Form ADV Part 2B - Item 4 - Other Business Activities

Michael C. Heaberg is a registered representative with Purshe Kaplan Sterling (“PKS”), a registered broker-dealer, and a member of FINRA/SIPC, not affiliated with Axiom Asset Management. To comply with FINRA Conduct Rules, PKS, as an unaffiliated broker-dealer, may periodically review Michael's investment advisory transactions. This information will be viewed by PKS's compliance department personnel for supervisory purposes only. No information viewed will be utilized for solicitation or shared with any affiliation outside the scope of regulatory compliance.

<https://www.finra.org/investors/top-nasd-rule-violations>

Brokerage accounts established with PKS are not accounts of Axiom Asset Management and are established with PKS. Michael may offer trading services for non-advisory (brokerage clients), allowing him to execute trades through PKS of these client assets. Axiom Asset Management does not believe this creates a conflict of interest on its part or on the part of its supervised person, nor does it think that it incentivizes its supervised persons to recommend investment products based on the compensation received rather than on a client's needs. As a Registered Representative of PKS, Michael C. Heaberg may receive commissions or other compensation for these transactions. For more information on this arrangement, please refer to the section on *Other Financial Industry Activities and Affiliations (Item 10)* in the firm's Form ADV 2A.

### Form ADV Part 2B - Item 5 - Additional Compensation

Michael C. Heaberg receives compensation for providing advisory services solely from his responsibilities at Axiom Asset Management. He does not receive any additional economic benefit from third parties for providing advisory services other than those described above.

### Form ADV Part 2B - Item 6 - Supervision

Our firm has in place written supervisory procedures, which include annual account reviews by the firm's supervised persons that are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations and to monitor the advice being provided to the firm's clients. Michael is a member of senior management and, as such, has no direct supervisor.

\* \* \*

## Form ADV Part 2B - Item 2 -Educational Background and Business Experience

**Supervised person: ROBERT W. LOREAUX**, Born 1944

Post-Secondary Education:

Temple University – 1962 – 1964

Lehigh University – 1965 – 1967

Recent Business Background:

WealthTrust Axiom, LLC, Executive VP, 11/2007 – Present

Purshe Kaplan Sterling Invest, Registered Representative, 06/2003 – 12/2015

Axiom Asset Management, LLC, Managing Director, 06/2003 – 10/2007

PaineWebber Incorporated, Senior Vice President, 05/1993 – 06/2003

## Form ADV Part 2B - Item 3 - Disciplinary Information

There are no legal or disciplinary actions to report for Robert W Loreaux.

## Form ADV Part 2B - Item 4 - Other Business Activities

Robert Loreaux has been appointed trustee for the Brenner Charitable Remainder Unitrust accounts. Prior to providing services, Mr. Loreaux had a long-term personal relationship with the grantor, Fred Brenner (deceased).

Robert Loreaux has been appointed trustee for the Robert & Joan Shoulberg Charitable Remainder Unitrust account. Prior to providing services, Mr. Loreaux had a long-term personal relationship with the grantors, Robert and Joan Shoulberg (both deceased).

## Form ADV Part 2B - Item 5 - Additional Compensation

Robert W Loreaux receives compensation for providing advisory services solely from his responsibilities at Axiom Asset Management and does not receive any additional economic benefit from third parties for providing advisory services. Robert Loreaux gets approximately \$14,000/year in trustee fees as a trustee of the above-referenced Trust accounts.

## Form ADV Part 2B - Item 6 - Supervision

Our firm has written supervisory procedures in place, which include annual account reviews by the firm's supervised persons. These procedures are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations and to monitor the advice being provided to the firm's clients. Robert is a member of senior management and, as such, has no direct supervisor.

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## Form ADV Part 2B - Item 2 -Educational Background and Business Experience

**Supervised person: CRAIG A ROSE**

Born 1974

Post Secondary Education

West Virginia University - 1996, BA

Recent Business Background

WealthTrust Axiom, LLC, Investment Adviser Representative, 11/2007 – Present

Axiom Asset Management, LLC, Investment Adviser Representative, 02/2003 – 10/2007

Purshe Kaplan Sterling Invest, Registered Representative, 06/2003 – 10/2021

PaineWebber Incorporated, Financial Advisor, 08/2000 – 06/2003

Olde Discount Corp, Registered Representative 8/1996 - 8/2000

## Form ADV Part 2B - Item 3 - Disciplinary Information

There are no legal or disciplinary actions to report for Craig A Rose.

## Form ADV Part 2B - Item 4 - Additional Compensation

Craig Rose receives compensation for providing advisory services solely from his responsibilities at Axiom Asset Management. He does not receive any additional economic benefit from third parties for providing advisory services other than those described above.

## Form ADV Part 2B - Item 5 - Supervision

Our firm has written supervisory procedures in place, which include annual account reviews by the firm's supervised persons. These procedures are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations and to monitor the advice being provided to the firm's clients. Craig is a member of senior management and, as such, has no direct supervisor.

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## Form ADV Part 2B - Item 2 -Educational Background and Business Experience

**Supervised person: DAVID WEBSTER**

Born 1964

Post Secondary Education

University of Alabama - 1987, BA

Recent Business Background

WealthTrust Axiom, LLC, Investment Adviser Representative, 04/2013 – Present

Purshe Kaplan Sterling Invest, Registered Representative, 04/2013 – Present

Wells Fargo Advisors, Financial Consultant, 05/2009 – 04/2013

Goldman Sachs, 07/2007 – 01/2009

### Form ADV Part 2B - Item 3 - Disciplinary Information

There are no legal or disciplinary actions to report for David Webster.

### Form ADV Part 2B - Item 4 - Other Business Activities

David Webster is a registered representative with Purshe Kaplan Sterling (“PKS”), a registered broker-dealer, and a member of FINRA/SIPC, not affiliated with Axiom Asset Management. To comply with FINRA Conduct Rules, PKS, as an unaffiliated broker-dealer, may periodically review David's investment advisory transactions. This information will be viewed by PKS's compliance department personnel for supervisory purposes only. No information viewed will be utilized for solicitation or shared with any affiliation outside the scope of regulatory compliance.

Brokerage accounts established with PKS are not accounts of Axiom Asset Management and are established with PKS. David may offer trading services to non-advisory (brokerage clients), allowing him to execute trades through PKS. Axiom Asset Management does not believe this creates a conflict of interest on its part or on the part of its supervised person, nor does it think that it incentivizes its supervised persons to recommend investment products based on the compensation received rather than on a client's needs. As a Registered Representative of PKS, David Webster may receive commissions or other compensation for these transactions.

David Webster is licensed to sell insurance products to clients of Axiom Asset Management through various insurance companies through PKS. When acting in his capacity as an insurance agent, Mr. Webster will receive commissions for selling insurance products and, as such, may have an incentive to recommend such insurance products based on his receipt of remuneration rather than the client's best interest. However, Management believes any such conflict of interest with our advisory clients is resolved by his fiduciary obligation to act in the best interest of our clients and by disclosure of this conflict.

For more information on these arrangements, please refer to the section on Other Financial *Industry Activities and Affiliations (Item 10)* in the firm's Form ADV 2A.

### Form ADV Part 2B - Item 5 - Additional Compensation

David Webster receives compensation for providing advisory services solely from his responsibilities at Axiom Asset Management. He does not receive any additional economic benefit from third parties for providing advisory services other than those described above.

### Form ADV Part 2B - Item 6 - Supervision

Our firm has in place written supervisory procedures, which include annual account reviews by the firm's supervised persons that are reasonably designed to detect and prevent violations of the securities laws, rules, and regulations and to monitor the advice being provided to the firm's clients. David Webster, Chief Compliance Officer of Axiom Asset Management, reports to Michael C. Heaberg. He can be contacted at the phone number listed at the beginning of *Form ADV Part 2B*.