



## **Axiom Advisors, LLC**

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Bedford, NH 03110  
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**www.axiom123.com**

**Firm CRD # 136305**

**Issue date: May 8, 2018**

*This brochure provides information about the qualifications and business practices of Axiom Advisors, LLC and its representatives. If you have any questions about the contents of this brochure, please contact us at the phone number listed above.*

*The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and its representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

**Item 2: Material Changes**

Due to a series of recent changes in securities regulation, investment advisers are now required to deliver disclosure information in this new format. This brochure incorporates the same information provided previously within the Form ADV Part II but with expanded disclosures designed to provide further information about the firm, its practices, and its personnel. Material updates to the information contained within this brochure will be provided to clients on an immediate basis. This section will be updated to reflect such material changes in a summary form.

The material changes in this brochure from the last annual updating amendment of Axiom Advisors, LLC on February 17, 2017 are described below. Material changes relate to Axiom Advisors, LLC's policies, practices or conflicts of interests.

- In 2017 Continuity Partners Group, LLC was bought out by Cambridge Investment Research, Inc. and David M. Wheat, ChFC and Brian E. Conway, CFP, RMS are no longer affiliated with CPG.

Should you have any questions related to this brochure, please contact a firm representative at your convenience.

**Item 3: Table of Contents**

Topic	Page #
Item 1: Cover Page.....	2
Item 2: Material Changes.....	2
Item 3: Table of Contents (this page).....	2
Item 4: Advisory Business.....	3
Item 5: Fees & Compensation.....	4
Item 6: Performance-Based Fees and Side by Side Management.....	4
Item 7: Types of Clients.....	4
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	5
Item 9: Disciplinary Information.....	5
Item 10: Other Financial Industry Activities & Affiliations.....	5
Item 11: Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading <sup>(OBJ)</sup> .....	6
Item 12: Brokerage Practices.....	6
Item 13: Review of Accounts.....	6
Item 14: Client Referrals & Other Compensation.....	6
Item 15: Custody <sup>(OBJ)</sup> .....	7
Item 16: Investment Discretion <sup>(OBJ)</sup> .....	7
Item 17: Voting Client Securities.....	7
Item 18: Financial Information.....	7
Item 19: Officers and Management Personnel.....	7
Part 2B: Brochure Supplements (Items 1-6) <sup>(OBJ)</sup> .....	(OBJ)

**Item 4: Advisory Business**

Established in 2005 by firm manager David M. Wheat, Axiom Advisors, LLC ("Axiom") provides financial planning and consulting services to a variety of client types.

### **Financial Planning and Consulting Services**

Axiom offers comprehensive financial planning to affluent individuals. This process typically begins with an initial complementary consultation during which the various services provided by Axiom are explained. Axiom believes in utilizing a cash flow based approach to a client's financial situation. This entails identifying a client's financial resources and matching them against the client's cash flow needs.

If it is the desire of the client to use Axiom's services, the firm and the client enter into an agreement. Detailed information about the client's personal and financial circumstances is needed. If necessary, Axiom may conduct follow-up interviews to discover a client's goals, values, and expectations as well as to review and/or collect financial data. Axiom will then initiate the financial planning process with the client.

Financial plans are based on the client's financial situation at the time the plan is presented and on financial information disclosed by the client to Axiom. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. Axiom does not offer any guarantees or promises that the client's financial goals and objectives will be met. It is critical that the client is to notify Axiom promptly if there is a change in a client's financial situation, goals, objectives, or needs.

Axiom Advisors assists the client in implementing the plan recommendations and provide ongoing consulting regarding the management of their financial resources.

Due to the nature of its business model, Axiom Advisors is a "Financial Planning Only" Registered Investment Advisor. Axiom Investment Advisor Representatives (IAR) maintain registrations as IAR's, Registered Representatives, and Insurance Brokers with:

- Cambridge Investment Research Advisors, Inc. an SEC Registered Investment Advisors, Fairfield Iowa. Axiom Advisors, LLC and Cambridge Investment Research Advisors, Inc. are not affiliated.
- Cambridge Investment Research, Inc. an Independent Broker Dealer, Fairfield, Iowa. Axiom Advisors, LLC and Cambridge Investment Research, Inc. are not affiliated.
- Various insurance companies.

As the planning process often leads to implementation with the IAR, this represents a conflict of interest.

### **Subscription Services: Success Track**

Success Track is an innovative financial coaching program offered by Axiom Advisors on a subscription basis. This program provides the client with a comprehensive internet based financial planning center. This system provides a state of the art financial dashboard in which all personal financial data is compiled and updated daily. Success track subscribers will have access to periodic coaching calls and tools to guide their decision-making process. Success Track is designed for individuals with significant income who desire to have a clear path to financial independence. It is offered on a subscription basis and can be paid monthly, quarterly, or annually in advance.

## **Item 5: Fees and Compensation**

### **Financial Planning and Consulting Services**

Financial planning services are generally provided on a fixed fee basis, and typically range from \$600 to \$25,000, depending upon the scope and complexity of the services requested. All services are rendered according to the terms and conditions of the client agreement. Please note; Axiom requires immediate payment of an initial deposit of 50% of the agreed upon fee. The balance of the fee is due upon the presentation of the financial plan. A written summary of the plan will be provided upon approval.

Axiom, in some instances may provide financial planning or consulting services on an hourly basis. The hourly rate for such services is \$250 to \$400. Administrative work is billed out at an hourly rate of \$75.

Clients charged an hourly fee are billed monthly. All fees remain negotiable and are at the sole discretion of the firm. Clients who subscribe to services can pay annually in advance by check, or monthly by credit or debit cards.

## **Item 6: Performance-based fees and Side-by-Side Management**

Axiom's investment advice does not manage portfolios and does not engage in side by side management.

Axiom does not incorporate the implementation of any performance fees.

## **Item 7: Types of Clients**

### **Comprehensive Financial Planning:**

Axiom's financial planning and consulting services are generally provided to affluent individuals. These individuals could have significant liquid and non-liquid assets to manage, or significant income for which to plan. Although there are no restrictions placed on clients as to minimum account size, the firm does require immediate payment of an initial retainer of 50% of the agreed upon fee. A client's services agreement with Axiom is non-assignable without the client's prior written approval.

### **Qualified Plan Analysis and Consultation:**

Trustees for Qualified Retirement Plans can retain Axiom Advisors, LLC for benchmarking analysis of their plans to see if their cost and performance is in line with the marketplace. Axiom Advisors uses independent resources to compare current plans to plans of the same size and similar industry. The 401 (k) Shield is a plan management process that provides guidance to plan fiduciaries for process and compliance.

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

In creating a comprehensive financial plan, Axiom gathers information about client's current assets and available resources, as well as client goals and objectives, both in the short and long term. Other considerations are made with respect to a client's liquidity and income needs, and their level of risk tolerance. Axiom also makes use of state of the art financial planning software programs and other tools to analyze client resources relative to any applicable cash flow needs. Because markets, world events and life itself is not predictable, our process allows great flexibility to modify strategies to meet current and future expected needs.

### **Item 19: Officers and Management Personnel**

Persons providing financial planning and investment advice must be registered as investment adviser representatives. Such representatives must meet the appropriate qualifications for registration and have at least five years of business experience or a college degree. Please refer to Part 2B of this brochure for further information with respect to firm personnel.

Axiom Advisor Representatives are required to act as fiduciaries for their client's affairs. This means the adviser must act in client's best interest in all matters. The Securities and Exchange Commission, and similar state statutes and rules have defined a fiduciary as one who has a duty to:

- Make reasonable investment recommendations independent of outside influences
- Select broker-dealers based on their ability to provide the best execution of trades for accounts where the adviser has authority to select the broker-dealer.
- Make recommendations based on a reasonable inquiry into a client's investment objectives, financial situation, and other factors
- Always place client interests ahead of their own.

### **Miscellaneous**

**Privacy:** the firm prohibits the disclosure of any client related information to third parties except in furtherance of the client/firm business relationship or as otherwise provided by law.

**Business Continuity:** In the event of a disruption in the normal course of business, Axiom has adopted a business continuity plan to assist with the recovery of business operations.

### **Item 9: Disciplinary Information**

The firm and its management personnel have never been the subject of any disciplinary, regulatory, criminal, civil, or otherwise reportable history.

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

Axiom Advisors IAR's act as fiduciaries for their clients. This means that they are bound legally and professionally to act in the best interest of their clients always. In order to offer comprehensive implementation, firm representatives maintain separate licenses and registrations as:

- Registered Representatives of Cambridge Investment Research, Inc., a FINRA registered broker/dealer.
- Investment Adviser Representatives of Cambridge Investment Research Advisors, Inc., a SEC registered investment adviser (combined "Cambridge").
- Various Insurance Companies

Through this arrangement, and in consideration for the business placed through Cambridge, the representatives listed above are subject to the receipt of additional advisory fees and transaction-based commissions. As planning recommendations lead to action that requires products and services which impact an IAR's income, this represents a conflict of interest. Therefore, advisory fees are disclosed to the client prior to choosing an investment.

The firm representatives listed above are also subject to additional commission-based compensation for their work as licensed insurance brokers representing of various insurance providers. This represents a conflict of interest. Such products may be recommended to advisory clients, where applicable to the clients' overall needs and objectives. Axiom's insurance offerings are offered to advisory clients solely as an additional service. Clients are under no obligation to participate in such offerings.

While Axiom and Cambridge do maintain a business relationship, the two firms are not affiliated by way of corporate control. Each firm remains independently owned and operated. Because Axiom IAR's receive compensation from Cambridge this represents a conflict of interest.

Members of the firm, David M. Wheat and Brian E. Conway are affiliated with Cambridge Investment Research, Inc. Cambridge Investment Research, Inc. is registered as a Registered Investment Adviser firm with the SEC and a registered broker/dealer with FINRA.

Although Cambridge Investment Research, Inc. has registered as an Investment Adviser, Cambridge Investment Research, Inc. does not provide advisory services. Cambridge Investment Research, Inc. has registered as an Investment Adviser solely because it acquires the goodwill associated with the client relationships serviced by Axiom Advisors, LLC Rep-Advisors participating in Cambridge Investment Research, Inc. Correspondingly, Cambridge Investment Research, Inc. will receive a portion of advisory fees generated from such investment advisory client relationships. Advisory fees will be paid by Axiom Advisors, LLC directly to Cambridge Investment Research, Inc. Axiom Advisors, LLC clients will not enter a direct client relationship with Cambridge Investment Research, Inc.

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

For their own personal accounts, firm personnel may purchase and/or sell products that they have similarly recommended to clients. Where such activity represents a conflict of interest, the firm has adopted a Code of Ethics which governs the firm's basic policies of ethical conduct. The Code is designed to provide firm personnel with some assurance that any conduct deemed in violation of the client's best interest will be met with swift disciplinary action.

Accordingly, personal securities transactions may be made, but only where such trades do not disadvantage the interests of a client. The firm maintains records of personnel securities holdings and regularly monitors transaction-based activity for any deviation from the Code. A copy of the Code of Ethics is available by request.

### **Item 12: Brokerage Practices**

Axiom does not maintain any soft-dollar arrangements.

### **Item 13: Review of Accounts**

Financial plans will be reviewed and updated at least annually. Clients are urged to notify Axiom promptly of any changes in objective or financial situation. Additional fees for reviews are at the sole discretion of Axiom Advisors.

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

Axiom does not compensate others for client referrals and receives no undisclosed compensation for referrals to third parties.

### **Items 15 & 16: Custody & Investment Discretion**

Due to the nature of its business offerings, Axiom does not exercise any discretionary authority over client accounts without the clients' express written authorization or maintain or accept custody of client funds or securities.

### **Item 17: Voting Client Securities**

Axiom does Financial Planning Only and does not vote, nor advise clients how to vote proxies for securities.

### **Item 18: Financial Information**

Under Rule 206(4)-4 of the Investment Advisers Act of 1940, and similar state statutes and rules, investment advisers are required to disclose certain information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

Axiom is not subject to any financial hardships or other conditions that might impair its ability to meet its contractual obligations to clients. Where the firm does require the prepayment of certain fees, such fees are in the form of a deposit for financial planning services which are then rendered shortly thereafter.

**FORM ADV Uniform Application for Investment Adviser Registration  
Part 2B: Brochure Supplements  
Investment Adviser Representatives and/or Supervised Persons: Supplemental information  
Item 1: Cover Page**

## **Axiom Advisors, LLC**

**Firm CRD #136305**

**3 Bedford Farms Drive, Suite 332**

**Bedford, NH 03110**

**Phone (603) 429-0626**

**Fax (603) 429-1227**

**[www.axiom123.com](http://www.axiom123.com)**

**Issue date: January 20, 2015**

*This brochure provides information about the qualifications and business practices of these representatives as investment adviser representatives of Axiom Advisors, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and its representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*





## Item 2: Educational Background and Business Experience

**NOTE:** Axiom Investment Advisor Representatives have licenses and affiliations that represent conflicts of interest. These affiliations are addressed in Section 10 of part 2B.

### *David M. Wheat, Manager, Investment Advisor Representative*

Year of Birth: **1951**

**Education:** Oklahoma Baptist University, BA in History, 1973

#### **Licenses/Professional Designations:**

- Chartered Financial Consultant, The American College, 1999,
- Accredited Investment Fiduciary® (AIF®) designation from the Center for Fiduciary Studies®, 2016,

#### Business Background:

- 07/2005 to Present, Axiom Advisors, LLC, Chairman
- 07/2005 to Present, Cambridge Investment Research, Inc. , Registered Representative
- 07/2010 to Present, Cambridge Investment Research, Inc. , Investment Adviser Representative
- 2003-2005, Mutual Service Corp., Registered Representative
- 1989-2003, State Mutual Companies/Allmerica Financial/Veravest, Inc.,
- Insurance Agent and Registered Representative

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### *Brian Conway, Investment Adviser Representative, Chief Compliance Officer.*

Year of Birth: **1967**

**Education:** Clarkson University, B.S. Engineering and Management, 1989  
Northeastern University,  
Coursework in Mechanical  
Engineering, 1990-  
1992

#### **Licenses/Professional Designations:**

Certified Financial Planner, The Certified Financial Planner Board of Standards, 2008, Certified Fund Specialist, The Institute of Business and Finance, 2004,

Axiom Investment Advisor Representative since: 2005

Page 9



Business Background:

- 01/2018 to Present Chief Compliance Officer, Axiom Advisors, LLC
- 07/2005 to Present, Axiom Advisors, LLC, Investment Adviser Representative
- 07/2005 to Present, Cambridge Investment Research, Inc. , Registered Representative
- 07/2010 to Present, Cambridge Investment Research Advisors, Inc., Investment Adviser Representative
- 2003-2005, State Mutual Corp, Registered Representative
- 2002-2003, State Mutual Companies/Allmerica Financial/Veravest, Inc., Insurance Agent and Registered Representative
- 2000-2002, United Equipment Technologies, Director 2000-2002,
- 1993-2000, United Equipment Technologies, Domestic & International, Sales Manager

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***Stuart J Bronson, Investment Adviser Representative***

Year of Birth: **1962**

**Education:** California State Polytechnic University Pomona, CA, 1981  
University of Arizona, B.A. Ecology and Evolutionary Biology, 1982-85

**Licenses/Professional Designations:**

Axiom Investment Adviser Representative since: 2013

Business Background:

- 02/2014 to Present, Axiom Advisors, LLC, Investment Adviser Representative
- 11/2013 to Present, Cambridge Investment Research, Inc. , Registered Representative
- 11/2013 to Present, Cambridge Investment Research Advisors, Inc., Investment Adviser Representative
- 12/1998 to 11/2013, MML Investors Services LLC, Investment Adviser Representative
- 5/1996 to 11/2013, MML Investors Services LLC, Registered Representative

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Page



***William J. Cummings, LUTCF, CLU, Investment Adviser Representative***

Year of Birth: **1958**

**License/ Professional Designations:**

Education:

Northeastern University, Bachelor of Science in Business Administration, 1981  
Life Underwriters Training Council Fellow, The American College  
Chartered Life Underwriter, The American College

Axiom Investment Advisor Representative since: 2013

Business Background:

- Investment Advisory Representative, Cambridge Investment Research Advisors, Inc., February 2013 To Present
- Registered Representative, Cambridge Investment Research, Inc., February 2013 To Present
- Registered Representative, Lincoln Financial Securities Corporation, July 2008 To February 2013
- Investment Advisory Representative, Lincoln Financial Securities Corp., July 2008 - February 2013.
- Registered Representative, Jefferson Pilot Securities Corp., September 1994 - July, 2008.
- Investment Advisory Representative, Jefferson Pilot Securities Corp., September, 1994 - July 2008.
- Registered Representative, MML Investors Services, February 1991 - September, 1994.
- Life, Health Insurance, Independent Insurance Broker, July 1992 - Present.
- Mass Mutual Life Insurance Company - life & health insurance agent, September, 1989 - September 1992
- Member - Cummings Financial, LLC - January 2010 - Present.

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Page



***Donna M. Rivera***

Year of Birth: **1956**

**License/ Professional Designations:** Certified Financial Planner, The Certified Financial Planner Board of Standards, 1988.

**Education:** Northeastern University, Bachelor of Science -CJ, 1977, 1978  
Suffolk University, Law, 1976, 1977, North Shore Community, Assoc. Degree-Law Enforce, 1974, 1976

Business Background:

- Axiom Investment Advisor Representative 2018—Present
- Investment Advisor Representative, Cambridge Investment Research Advisors, Inc., November 2017- Present
- Registered Representative, Cambridge Investment Research, Inc., November 2017- Present
- Registered Representative, Lincoln Financial Securities Corporation, July 2008 To November 2017.
- Registered Representative/Investment Advisor since 1984

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***Name & Title:***

***Jeremy W. Benoit, Investment Advisor Representative***

Year of Birth: **1970**

**Education:** University of Vermont, B.S. in Small Business Management, 1992

**Licenses/Professional Designations:** Chartered Retirement Planning Counselor, College for Financial Planning, 2006,

Business Background:

- Axiom Investment Advisor Representative since: 2018
- Investment Advisor Representative, Cambridge Investment Research Advisors, Inc. November 2017 to Present
- Registered Representative, Cambridge Investment Research, Inc., November 2017 to Present
- Investment Advisor Representative, Lincoln Financial Securities Corp., July 2008 to November 2017
- Registered Representative, Lincoln Financial Securities Corp., July 2008 to November 2017
- Investment Advisor Representative, Jefferson Pilot Securities Corp., January 2002 to July 2008
- Registered Representative, Jefferson Pilot Securities Corp., January 2002 to July 2008
- Registered Representative, Signator Investors, Inc., August 1992 to January 2002

Page

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***Paul S. Como, Investment Advisor Representative***

Year of Birth: **1974**

**Education:** Bentley College, BS in Management, 1997

**Licenses/Professional Designations:** Chartered Retirement Planning Counselor, College for Financial Planning, 2008, Series 6,62,63 and 65 examinations

**Business Background:**

- Axiom Investment Advisor Representative 2018 to Present
- Investment Advisor Representative, Cambridge Investment Research Advisors, Inc.  
November 2017 to Present
- Registered Representative, Cambridge Investment Research, Inc., November 2017 to Present
- VP, Bernard M. Sullivan Insurance Agency, Inc. January 1, 2018 to Present
- Corporator, Institution for Savings, Newburyport, MA 2011 to Present
- Agent, Anthony and Malcolm Insurance Agency, Inc., April 2017 to 12/31/2017
- Investment Advisor Representative, Lincoln Financial Securities Corp., July 2008 to November 2017
- Registered Representative, Lincoln Financial Securities Corp., July 2008 to November 2017
- Manager, Bernard M. Sullivan Insurance Agency, Inc., July 2004 to April 2017
- Investment Advisor Representative, Jefferson Pilot Securities Corp., October 2007 to July 2008
- Registered Representative, Jefferson Pilot Securities Corp., October 2007 to July 2008

■ Paul S Como is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Axiom Advisors, LLC, Bedford NH always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Axiom Advisors, LLC, Bedford NH in their capacity as a licensed insurance agent.

■ Paul S Como is a Manager of Bernard M. Sullivan Insurance Agency, Inc. - Insurance agency. From time to time, he will offer clients advice or products from this activity. Axiom Advisors, LLC, Bedford NH always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Axiom Advisors, LLC, Bedford NH in such individual's outside capacity.

■ Paul S Como is an On Board of Corp-orators - Institution for Savings - Local bank based in Newburyport, MA. From time to time, he will offer clients advice or products from this activity. Axiom Advisors, LLC, Bedford NH always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Axiom Advisors, LLC, Bedford NH in such individual's outside capacity.



***Jeremy W. Benoit, Investment Advisor Representative***

Year of Birth: 1970

Education: University of Vermont, B.S. in Small Business Management, 1992

Licenses/Professional Designations: Chartered Retirement Planning Counselor, College for Financial Planning, 2006,

**Business Background:**

- Investment Advisor Representative, Cambridge Investment Research Advisors, Inc. November 2017 to Present
- Registered Representative, Cambridge Investment Research, Inc. , November 2017 to Present
- Investment Advisor Representative, Lincoln Financial Securities Corp. , July 2008 to November 2017
- Registered Representative, Lincoln Financial Securities Corp. , July 2008 to November 2017
- Investment Advisor Representative, Jefferson Pilot Securities Corp., January 2002 to July 2008
- Registered Representative, Jefferson Pilot Securities Corp., January 2002 to July 2008
- Registered Representative, Signator Investors, Inc. , August 1992 to January 2002

**Item 3: Disciplinary Information**

Please note: The investment adviser representatives listed above do not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

**Item 4 and 5: Other Business Activity and Additional Compensation**

Please review Item 10 of Part 2A (this brochure) for information related to other business activity and additional compensation.

**Item 6: Supervision**

David Wheat remains responsible for the supervision of firm personnel and their activities on behalf of same. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any employee may be directed to Mr. Wheat at the phone number listed on the cover of

Page