
Walter B. Todd, III

Item 2: Educational Background and Business Experience

CRD (Central Registration Depository) Number: 3262917

Year of birth: 1971

Formal education:

- ▶ Washington and Lee University, BS – Business Administration, 1993
- ▶ The Wharton School, MBA, 1999

Business Background:

- ▶ President/Chief Investment Officer, Greenwood Capital, Aug 2017 to present
- ▶ Chief Investment Officer/ Managing Director, Greenwood Capital, June 2011 to Aug 2017
- ▶ Co-Chief Investment Office/Portfolio Manger, Greenwood Capital, Jan 2007 to June 2011
- ▶ Joined Greenwood Capital in 2002



Item 3: Disciplinary Information

Mr. Todd has not been the subject of any material legal or disciplinary event.

Item 4: Other Business Activities

Mr. Todd is not engaged in any business activities other than those related to Greenwood Capital.

Item 5: Additional Compensation

As a direct owner of Greenwood Capital Associates, LLC, Mr. Todd receives a share of profits based upon his percentage of ownership. Mr. Todd is eligible to receive a percentage of the advisory fee paid to us by clients obtained because of his direct or indirect efforts as an incentive to bring new and maintain business under our management. In addition, Mr. Todd is eligible to receive cash referral bonuses as part of the relationship with Greenwood Capital's parent company, TCB Corporation, for successful client referrals made to any of Greenwood Capital's affiliated entities. Mr. Todd may also receive a bonus that is based, all or in part, on investment performance, the number or amount of sales, client referrals, or new accounts.

Item 6: Supervision

Mr. Todd is supervised through Greenwood Capital's policies and procedures, including adherence to the firm's Code of Ethics. Greenwood Capital monitors the advice Mr. Todd provides to clients through the following supervisory reviews:

- ▶ Review of relevant account-opening documentation at the establishment of the client relationship;
- ▶ Ongoing daily review of client account transactions;
- ▶ Quarterly review of custodial information to assess account activity;
- ▶ Annual supervisory oversight to confirm continued understanding of each client's financial situation, investment objectives, and individual investment needs, as well as any stated Financial Suitability requirements and/or applicable Investment Policy Statement;
- ▶ Review of client correspondence on an as-needed basis.