

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Western International Securities, Inc. ("WIS") If you have any questions about the contents of this brochure, please contact us at: 626-793-7717, or by email at: admin@wisdirect.com. 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.

Additional information about WIS is available on the SEC's website at www.adviserinfo.sec.gov

1.13.2012

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 626-793-7717 or by email at admin@wisdirect.com, or access our website at www.wisdirect.com.

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Advisory Business

Firm Description

("WIS") was founded in 1995.

WIS is a registered investment advisor with the Securities and Exchange Commission providing a full range of financial products to clients, including stocks, bonds, mutual funds, options and direct investments to clients through Investment Advisor Representatives ("IAR") of WIS. WIS offers three custodian relationships, JP Morgan Clearing Corp., Charles Schwab, and Pershing, LLC where client assets are held. WIS will not take custody of client's funds which are designated for an advisory account.

WIS Investment Advisory Representatives ("IAR") provide personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations as well as small and large businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Investment advice is an integral part of financial planning. In addition, Western International Securities, Inc. advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. The client always maintains asset control. WIS places trades for clients under a limited power of attorney.

Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Concept Brokerage Holding Corp is 100% owner of WIS.

Types of Advisory Services

WIS provides investment advisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations and individual meetings. Western does not take custody or hold of client assets or funds. Client funds are maintained with independent clearing agencies. The advisory account maintained through Western may include investments in exchange traded funds, mutual funds, stocks, bonds, and with additional approval, covered or hedged option positions. The client may deposit cash or other marketable securities in the account and Western and its Advisor Representative may liquidate the securities and purchase mutual funds, stocks, bonds or other suitable investments.

On more than an occasional basis, WIS furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning. As part of a general financial planning process, IARs occasionally will gather information to assess the client's current situation to help the client define financial goals and investment objectives. WIS will then analyze the data and create a personalized, written financial plan and then assist the client with implementing the plan. Should a client choose to implement the recommendations contained in the plan, WIS suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion. WIS maintains relationships with other professionals who can support the client's personal and business needs by providing expertise in related areas such as banking, insurance, accounting and payroll, legal, pension administration and mortgage brokerage services. WIS does not provide tax preparation or legal services for clients. Some Advisor Representatives are tax preparers, enrolled agents, or CPA's and any tax service provided is outside the scope of their affiliation with WIS..

As of 12/31/2011, WIS Investment Advisory Representatives manage approximately \$410,000,000.00 in assets for approximately 2500 client accounts. All of the assets are managed on a discretionary basis, meaning the Advisor Representative does not have to contact the client prior to purchasing or selling securities.

Western provides clients with the opportunity to have their accounts or portfolios managed by outside independent investment advisors (third-party money managers). Third-party money managers provide portfolio analysis, asset allocation, trade execution, performance monitoring and reporting. Clients enter into and sign separate advisory agreements with the third party managers to provide the services requested. Clients are provided Form ADV Parts I and II for the third-party advisor. The executing and clearing broker for the third-party advisor(s) are determined by the arrangement with the respective entities and disclosed to the client. The Western advisor will discuss and review the asset allocation and investment strategy of the third-party advisor with the client. The Western advisor will not be involved in the

selection of individual securities purchased or the execution of transactions through the third-party advisor.

Clients may impose any restriction in the account, including the trading activity, by submitting a written request to WIS detailing the parameters of the restriction. For example, the restriction can be placed on the type of security, including socially responsible companies, the frequency of trading, or the percentage of asset allocation.

Tailored Relationships

The goals and objectives for each client are documented in our client account agreement. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

Financial planning services are designed to help the client with all aspects of financial planning and sometimes do not include ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

Financial planning services are provided on an hourly fee basis. Hourly fees are billed on a monthly basis and are due from the client upon receipt of the bill. An estimate of the time involved in the project or projects requested by the client may be given from time to time; however, no estimate is binding, and the client's billings will reflect actual time spent. The maximum fee is \$200.00 per hour and is negotiable. Since financial planning is a discovery

process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised estimate of the hourly fee will be provided. The client must approve the change of scope in advance of the additional work being performed when a fee estimate increase is necessary.

Future face-to-face meetings may be scheduled as necessary. Follow-on implementation work is billed separately at the rate of up to \$200.00 per hour.

To the extent that a recommendation is made to implement the plan through other products or services offered by WIS, a conflict of interest may exist between the interests of Western and the interest of the client. The client is under no obligation to act upon the Advisor Representative's recommendations. If the clients elect to act on any recommendations, the client is under no obligation to effect the transactions through the investment advisor or WIS.

Advisory Service Agreement

Most clients choose to have WIS Investment Advisory Representatives manage their assets in order to obtain ongoing in-depth advice and life planning. The client's financial affairs, including net worth, investment objectives, income, tax rates and experience are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for advisory services is noted in the Investment Management Agreement. The Investment Management Agreement describes the services provided, including but not limited to; execution of transactions, description of custodial management, reporting, disclosure of fees and valuations, risk acknowledgement, client authority and termination of agreement.

The annual Investment Management fee is based on a percentage of the investable assets according to the agreed upon percentage of assets.

The fee is *NEGOTIABLE*. Current client relationships may exist where the fees are higher or lower than other client accounts based on several factors.

Although the Investment Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be

billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Retainer Agreement

In limited circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is *NEGOTIABLE*.

Investment Management Agreement

An *Investment Management Agreement* is referred to under the previous heading of Investment Advisory Services. The annual fee is *NEGOTIABLE*.

Tax Preparation Agreement

WIS does not provide Tax preparation services for clients. Some Advisor Representatives are tax preparers, enrolled agents, or CPA's and any tax service provided is outside the scope of their affiliation with Western. Clients will sign separate engagement letters for tax preparation with the unaffiliated entity.

Hourly Planning Engagements

WIS provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$200.00. The fee is negotiable.

Asset Management

See Investment Advisory Services and Types of Advisory Services.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying WIS in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, WIS will refund any unearned portion of the advance payment.

WIS may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, WIS will refund any unearned portion of the advance payment.

Fees and Compensation

Description

WIS bases its fees on a percentage of assets under management, hourly charges, or fixed fees.

Financial plans are priced on an hourly basis and according to the degree of complexity associated with the client's situation, as described above.

Fees are *negotiable*.

Fee Billing

Investment management fees are billed quarterly, in *advance*, meaning that we invoice you before the three-month billing period has begun. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. For example, the investment account will be billed on January 1st for the period January 1 through March 31. An account valued at \$100,000 on December 31st with agreed upon fee charged of 2%, would be billed \$500.00 ($\$100,000 \times 2\% = \$2,000 / 4 = \500) for the upcoming quarter.

Fees for financial plans are billed upon delivery of the financial plan.

Other Fees

Custodians may charge certain processing fees, such as postage and handling fees on purchases or sales of certain stocks, bonds, options, mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. IRA accounts are charged an annual maintenance fee by the custodian.

Transaction or ticket charges associated with the execution of trades are applied to the customer account. The Investment Management Agreement details how the charges will be applied and signed by the customer.

For accounts that are maintained with third-party investment advisors, Western receives a portion of the advisory fee charged by the third-party investment manager. The advisory fee charged to the client by the third-party investment manager is disclosed in the third-party investment manager's advisory service agreement and FORM ADV or related disclosure document.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to WIS.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Exchange Traded Funds generally charge annual expenses for the services. Therefore, if the portfolio invests in exchange traded funds, the stated price includes the annual expense charged for the fund.

Past Due Accounts and Termination of Agreement

WIS reserves the right to stop work on any account that is more than 30 days overdue. In addition, WIS reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in WIS's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

The client may terminate their fee-based relationship any time via written request. Upon receipt of any request to terminate, fees will be refunded on a pro rata basis (i.e., if client terminates in the middle of a quarter, he will only pay for the number of days he was under contract and a balance will be refunded). For example, if a client paid advisory fees of \$500.00 at the beginning of the quarter and transferred their account out midway through the quarter, WIS would refund the client half of the advisory fees paid during the period.

WIS IARs may own an interest in or buy or sell for their own accounts the same securities, which may be purchased or sold in the accounts of advisory clients. These activities can create a potential conflict of interest.

In all cases, client orders are given priority. In no case shall an associated person receive a better price or more favorable circumstances than a client. IARs seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients. Policies and procedures have been adopted to prevent the misuse of material non-public information and to detect and prevent insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients. Personal transactions of associated persons are regularly monitored to ensure that client interests are put first in all relevant circumstances. Cross and principal transactions are prohibited. WIS will act solely in an agency capacity.

Performance-Based Fees

Sharing of Capital Gains

Performance-based fees are based on a share of the capital gains or capital appreciation of managed securities.

WIS does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

WIS generally provides investment advice to individuals, high net-worth individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$25,000 of assets under management, which, at a maximum rate of 3% per year, equates to an annual fee of \$750.00

Depending on the program the client is invested in, there might be a minimum annual fee.

WIS has the discretion to waive the account minimum. Accounts of less than \$25,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$25,000 within a reasonable time. Other exceptions will apply to employees of WIS and their relatives, or relatives of existing clients.

Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The investment strategies used on client accounts include strategic asset and tactical allocation methods. A tactical strategic approach involves an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors. The strategic allocation is a portfolio strategy that involves periodically rebalancing the portfolio in order to maintain a long-term goal for asset allocation.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a client account agreement that documents their risk tolerance, time horizon, and their desired investment objective.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Investors should be aware that investing in securities involves a risk of loss, including the entire investment amount. Frequent trading of an account can impact and reduce the overall rate of return in the account through increased brokerage charges and transaction costs, tax implication, and deviation from asset allocation objectives.

Disciplinary Information

Legal and Disciplinary

For information regarding Western and Western's Investment Advisory Representatives legal and disciplinary history, you may access the Broker Check through www.finra.org.

In 2008, WIS was fined \$12,500 for failure to purchase or sell six corporate bond transactions during the period January 2003 to March 2005 at a price that was fair, taking into consideration all relevant circumstances, including market conditions with respect to each bond at the time of transaction. WIS paid restitution of \$2,199, plus interest to the customers.

In 2006, WIS was fined \$8,000 for incorrectly reporting markup/markdown as commissions and the correct capacity for transactions in corporate debt.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

WIS is registered as a securities broker-dealer with both the SEC and FINRA, and also as an independent introducing broker-dealer with the NFA. Securities transactions executed on a non-advisory, commission basis will be processed through WIS as a brokerage transaction. Commissions earned on securities products will be paid the advisor as listed in the prospectus. The IAR is prohibited from transacting securities business away from WIS without prior written approval from Western.

Affiliations

WIS is a registered broker-dealer with the SEC and FINRA, and also as an independent introducing broker with NFA.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of WIS have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

This code of ethics ("Advisor Code") is intended to reflect fiduciary principals that govern the conduct of WISI and its supervised persons in those situations where WISI acts as an investment advisor as defined under the Advisers Act in providing investment advice to clients ("advisory clients"). It consists of an outline of policies regarding several key areas: standards of conduct and compliance with laws, rules and regulation, protection of material non-public information and personal securities trading. It also consists of specific information and guidance that is provided in company-wide policies and procedures, including the WISI Written Supervisory Procedure Manual (WSP) and the WISI IA Policies and Procedures Manual (IAPP).

WIS does not act as principal in trading client accounts, transactions are conducted on an agency basis.

WIS IARs may own an interest in or buy or sell for their own accounts the same securities, which may be purchased or sold in the accounts of advisory clients. These activities can create a potential conflict of interest.

In all cases, client orders are given priority. In no case shall an associated person receive a better price or more favorable circumstances than a client. IARs seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients. Policies and procedures have been adopted to prevent the misuse of material non-public information and to detect and prevent insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients. Personal transactions of associated persons are regularly monitored to ensure that client interests are put first in all relevant circumstances. Cross and principal transactions are prohibited. WIS will act solely in an agency capacity.

Participation or Interest in Client Transactions

WIS and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. This prohibition is explicitly forbidden in WIS's written policies and procedures and monitored for compliance.

Personal Trading

The Compliance Department and designated branch supervisors of WIS review employee trades each business day. These personal trading reviews ensure that the personal trading of employees does not affect the markets and those client transactions receive equal treatment. Transactions are entered into the trading system, specifically into the client's account. For transactions that are executed in large volumes, Western's trading desk will execute the transactions and provide an average price for all the shares. Each client receives the average price for the transaction.

Brokerage Practices

Selecting Brokerage Firms

WIS does not have any affiliations with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. WIS recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. WIS is a registered broker-dealer.

Best Execution

WIS reviews the quality of execution on transactions on a quarterly basis. The review includes comparisons between the executed price and the price of the prevailing market at the time of execution. Discrepancies noted in the quality of execution are brought to senior management, including but not limited to, the Chief Compliance Officer, the Head of Trading, and Managing Directors.

Soft Dollars

WIS does not receive a software maintenance credit or similar soft dollar credits from any of its custodians.

Order Aggregation

Aggregation or “bunching” trade orders for execution may prove advantageous to the client. The client would participate in receiving an average price, which would then be allocated into their account on a fair and equitable basis. This provides equal treatment of clients in that no advisory client would be favored over any other client. WIS's books and records will separately reflect securities held by, or bought or sold for, client accounts that participate in the aggregation.

WIS does not recommend other brokers through referrals or receive client referrals from other brokers. WIS does not recommend or require clients to direct transactions through a specific broker.

Review of Accounts

Periodic Reviews

Account transactions are reviewed on a daily basis by the designated branch supervisor. In addition, WIS's compliance and risk personnel review daily and monthly activity reports to detect irregularities in account activity. The reviews include securities transactions and money movements/transfers in customer accounts.

Review Triggers

Other conditions that may trigger a review are changes in regulatory events, tax laws, new investment information, red flag warning signals detected during routine reviews, and changes in a client's own situation.

Regular Reports

Clients receive periodic account statements on a quarterly basis, provided by third parties, including custodians.

Client Referrals and Other Compensation

Incoming Referrals

WIS has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

WIS does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Not applicable

Custody

Account Statements

All assets are held at qualified custodians, which mean the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Detailed Performance Reports are available for an additional fee. Clients are urged to compare the account statements received directly from their custodians to those performance report statements provided by WIS

Net Worth Statements

Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used occasionally for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

WIS has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. By signing the Investment Management Agreement, you sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

WIS does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, WIS will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

WIS does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because WIS does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

WIS has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

Should a key member of WIS management team resign, be terminated, or no longer associate with firm for various other reasons, Western will take steps to immediately look to replace the individual. The current infrastructure of the firm is able to accommodate the advisory business should the firm lose a key member of the management team.

Information Security Program

Information Security

WIS maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

This Privacy Policy describes the types of non-public personal information (“information”) we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information, and the steps we take to safeguard the information to protect your privacy. WIS is committed to maintaining the trust that you place in us and we recognize the importance of protecting your Information.

The information we collect about you is primarily obtained from account applications and other forms and materials you submit to WIS during the course of your relationship with us. We may also collect information about the transactions and interactions you engage in with or through Western. In addition, we may verify information or obtain additional information about you from consumer reporting agencies or other sources. The information we collect about you would include, but not limited to: your name, address and other contact information, date of birth, occupation, marital status, sources of wealth, investment experience and objectives, risk tolerance, representations about your financial resources, specific identifying information as may be required by law and regulations addressing money laundering, terrorism and related matters, as applicable, your passport, driver’s license or other governmental information, social security number or tax payer identification. WIS does not sell customer lists, names or other identifying information.

We do not share information about you outside of WIS without your consent except for the specific purposes described below, in accordance with applicable laws. We may disclose information we collect from you to companies or third parties that perform support services for WIS or your account, such as facilitating your transactions with or through WIS, including those that provide custody of client funds and securities, professional, legal or accounting services, audit or research services, computer related or data maintenance or processing services, or for credit review or reporting purposes. We may disclose your personal information as permitted or required by law or regulation. Non-affiliated companies that assist WIS in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your information only for the purpose of providing such services.

WIS limits access to your information to authorized WIS employees and representatives acting on your behalf. Western also maintains physical, electronic and procedural safeguards designed to comply with applicable laws and protect against loss, modification and unauthorized access to your information. WIS updates and tests our technology to improve the protection of customer information. WIS operates a website for client login information. Portions of the

website require a user name and password to gain access. Your username and password are unique to you and should not be shared with anyone. You should notify Western if you have reason to believe someone else may have access to your username and or password. WIS may use “cookies” to gather information or provide better service to you or facilitate your use of the WIS website. “Cookies” are small text files consisting of information stored on your Web browser. This information may assist WIS with administrative purposes. You can set your Web browser to inform you when cookies are set or decline cookies. If you decline cookies you may be unable to use certain feature on our website.

If your financial advisor terminates his or her relationship with WIS and moves to another broker-dealer or investment advisor, we, or your financial advisor, may disclose personal information to the new financial institution unless you instruct us not to. If you choose not to move your account to the new financial institution for your advisor, you may request that WIS limit the information shared with the new financial institution. If your primary address is in a state (such as California and Vermont), which requires your affirmative consent to share your nonpublic information with the financial advisor’s new firm, then you must give your written consent before Western will allow your financial advisor to take your nonpublic information with him or her. You can withdraw your consent at any time by contacting WIS. WIS reserves the right to change this Privacy Policy at any time to reflect changes in our practices concerning the collection and use of information. If there are material changes to this Privacy Policy, the revised policy will be effective immediately upon posting to our external website. If you require additional information, please contact us at 626-793-7717.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

WIS requires that advisors in its employ have a bachelor's degree or relevant work experience and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Your investment advisor is required to provide you a copy of Part 2B regarding their specific background information.

Listed below is detailed information regarding the principals of WIS. For additional information regarding the principals, please visit Broker/Check at www.finra.org.

Donald Bizub, CERTIFICATIONS**Educational Background:**

- Date of birth: March 1965
- Institutions: Finance/Real Estate Law Degree Cal Poly Pomona 1992

Business Experience:

- CEO/CFO/ Managing Director, Western International Securities 1996 to Present

Disciplinary Information: None

Other Business Activities: Xeen, LLC

Additional Compensation: None

Supervision:

Donald Bizub is supervised by Patrick Dailey. He reviews Mr. Bizub's work through frequent office interactions. He also reviews Mr. Bizub's activities through transaction blotters.

SUPERVISOR'S contact information:

Patrick Dailey
626-793-7717
Patrick@wisdirect.com

Arbitration Claims: None

SEC, State, Self-Regulatory Organization or other Financial Regulatory Proceeding: None

Bankruptcy Petition: None

Andrew Kuo, CERTIFICATIONS**Educational Background:**

- Date of birth: February 1979
- Institutions: BA International Business Cal State Fullerton, 2004.

Business Experience:

- Western International Securities, Inc. June 2007 to Present
- WM Financial Services Jan 2005 to June 2007

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Andrew Kuo is supervised by Don Bizub.

SUPERVISOR'S contact information:

Donald Bizub

626-793-7717
biz@wisdirect.com

Arbitration Claims: None

SEC, State, Self-Regulatory Organization or other Financial Regulatory
Proceeding: None

Bankruptcy Petition: None

Guenter R. Wirth, CERTIFICATIONS

Educational Background:

- Date of birth: October 1969
- Institutions: MBA equivalent degree, University of Tuebingen, Germany 1994

Business Experience:

- Managing Director, Western International Securities, Dec 2005 to Present.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Guenter Wirth is supervised by Don Bizub.

SUPERVISOR'S contact information:

Donald Bizub
626-793-7717
biz@wisdirect.com

Arbitration Claims: None

SEC, State, Self-Regulatory Organization or other Financial Regulatory
Proceeding: None

Bankruptcy Petition: None

Richard Gilliland, Jr., CFP, CERTIFICATIONS

Educational Background:

- Date of birth: February 1960
- Institutions: AA, Finance University of New York 1984
- CFP*

CFP Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Business Experience:

- Director Branch Manager, Western International Securities, March 2001 to Present.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Richard Gilliland is supervised by Brad Kaiser.

SUPERVISOR'S contact information:

Brad Kaiser

626-793-7717

brad@wisdirect.com

Arbitration Claims: None

SEC, State, Self-Regulatory Organization or other Financial Regulatory

Proceeding: None

Bankruptcy Petition: None

Bradley Kaiser, ChFC®, CERTIFICATIONS

Educational Background:

- Date of birth: May 1971
- Institutions: Cal State Long Beach B.S. Finance 1994
- American College – Chartered Financial Consultant 2008- 2010.

ChFC Chartered Financial Consultant: ChFC designation is awarded by The American College. ChFC requirements:

- Completion of the financial planning education requirements set by The American College (9 courses with examination).
- Three-year qualifying full-time work experience.
- Code of Ethic Standards

Business Experience:

- Chief Compliance Officer, Western International Securities, February 2009 to Present.
- Financial Consultant, National Planning Corporation July 2004 to Jan 2009.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Brad Kaiser is supervised by Donald Bizub.

SUPERVISOR'S contact information:

Donald Bizub

626-793-7717

biz@wisdirect.com

Arbitration Claims: None

SEC, State, Self-Regulatory Organization or other Financial Regulatory Proceeding: None

Bankruptcy Petition: None