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Part 2A of Form ADV

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This brochure provides information about the qualifications and business practices of WRP Investments Inc., a federally registered investment advisor. All information contained within this brochure should be considered before becoming a client of WRP Investments, Inc. Registration does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please feel free to contact your investment advisor representative, or you may also contact WRP Investments at 1-800-589-2023. 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 WRP Investments, Inc. is also available on the United States Securities and Exchange Commission's website at www.adviserinfo.sec.gov.

[Item 2] Material Changes

- A.) The purpose of this item is to disclose only the material changes since the last annual update of the WRP Investments, Inc. Form ADV Part 2A Brochure which was dated May 27, 2011.

This filing provides additional disclosure of the custodial relationship between WRP Investments, Inc (Registrant) and TD Ameritrade Institutional (TD Ameritrade) on page 16 and page 18 within Item 12 “Brokerage Practices” and Item 15 “Custody”. The Registrant has entered into a custodial relationship for TD Ameritrade to provide custody and clearing services for the Registrant’s General Securities and Mutual Fund Advisory Accounts. This relationship is in addition to the custodial relationship already in place between the Registrant and National Financial Services (NFS), and does not replace the relationship between the Registrant and NFS.

This filing also provides additional disclosure of the solicitation relationship between the Registrant and Odell & Critchley, P.C. on page 18 within Item 14 “Client Referrals and Other Compensation”. The Registrant has entered into a solicitor’s agreement for Odell & Critchley P.C. to solicit its clients to the Registrant in exchange for a referral fee in accordance with rule 206 (4)-3 of the Investment Advisors Act of 1940.

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[Item 4] Advisory Business

A.) WRP Investments, Inc. ("Registrant") was founded in 1976 and currently operates as a securities broker/dealer, but also offers certain investment advisory services to clients through designated broker-dealer registered representatives functioning in the capacity as the Registrant's investment adviser representatives ("IARs"). The IARs are typically not separately registered as investment advisers. In addition, certain of the Registrant's broker/dealer representatives who are separately registered as investment advisers, or who are IARs of separately registered investment advisers, provide investment advice to the Registrant's brokerage clients. In the latter case, the Registrant serves as the sponsor of the program and executes trades on behalf of clients' accounts in its capacity as a broker/dealer.

WRP Investments' current principal owners:

David M. Pintaric	President, CEO	Ownership Code – C
William R. Pintaric Jr.	Vice President, CCO	Ownership Code – C

B.) Registrant offers a comprehensive investment program in which clients pay an inclusive wrap fee for brokerage and asset allocation services, portfolio supervision, consolidated reporting and periodic recommendations based upon the client's investment objectives (the General Securities Account). In addition, the Registrant offers an investment program in which clients receive investment management services through purchases and sales of no load and front-end load-waived mutual fund shares in exchange for an inclusive fee (the Mutual Fund Account). Registrant offers an investment program in which clients receive investment management services including fund allocation for assets under separate custody agreements including variable insurance and mutual funds (Client Agreement – Monitoring Service). All transactions in the General Securities Account, the Mutual Fund Account, and the Monitoring Account are executed at the direction of the client using limited discretion, unless the client has authorized full discretionary trading.

Certain of Registrant's broker/dealer registered representatives who function as IARs provide financial planning services for clients. Such IARs may consult with their clients' legal, accounting, and other advisors, and advise clients regarding tax planning, tax-sheltered investments, real estate investments, investments, and provide asset management advice. Where requested, an IAR serves as a client's general financial advisor and makes recommendations to the client based on such client's investment and financial goals.

Fees charged by the IARs for financial planning services are generally based upon actual or estimated hourly charges, which may vary according to the experience and location of the IAR. Hourly fees charged by the IARs generally range from \$50 to \$500. The IARs may quote fixed fees based upon the projected hourly charges to be incurred and the scope and nature of the work to be performed. One half of the total or estimated fee of such IARs is due at the commencement of the engagement, and the balance is due upon presentation of the financial plan.

In addition, Registrant provides similar financial planning services on behalf of its IARs. Registrant charges its IARs a wholesale fee for such services, and the IARs then charge their clients a retail fee for such services that generally ranges from \$150 to \$5000. Under certain circumstances, Registrant may also charge an additional fee based upon actual or estimated hourly charges that generally range from \$50 to \$500.

Neither Registrant nor its IARs are qualified to render legal or accounting advice, and do not purport to render any such advice.

Managed Account Solutions (MAS):

Registrant offers investment advisory services to clients through the Managed Accounts Solutions Program ("MAS Program") of National Financial Services, LLC ("NFS") which consists of the Separately Managed Account Program ("SMA"), the Multi-Manager Account Program ("MMA"), the Wrap Strategists Program (the "Wrap Strategists"), and Representative as Portfolio Manager Program ("Rep as PM"). The Registrant has a fully disclosed clearing arrangement with NFS to provide clearance and custody services for the MAS Program's accounts. Each account program offers investment strategies designed to meet each client's specific financial needs and investment objectives. Registrant has entered into a co-advisory relationship with Envestnet Asset Management, Inc. ("Envestnet" or "the Sponsor") to offer the MAS Program. The Registrant's investment adviser representatives assist clients in reviewing information about the programs, completing a client questionnaire to determine the client's risk tolerance and objectives, and selecting an investment strategy. Envestnet provides proprietary analytical tools, as well as monitoring and research of a large universe of independent money managers with mutual fund and ETF portfolios offered through the MAS Program.

The Registrant's representatives remain available to clients on an ongoing basis regarding their program account to determine if there have been changes in the client's financial situation that can affect the appropriateness of the client's particular portfolio.

(MAS) The Separately Managed Account Program:

Under the SMA Program, Registrant and Envestnet act as co-advisors in designing and implementing an asset allocation strategy for the client using separately managed accounts. Registrant's investment adviser representatives help clients design an investment strategy adequate to each client by identifying the client's financial circumstances, investment horizon, needs, objectives, and other relevant factors. Using Envestnet's analytical tools, the Program then develops an asset allocation strategy appropriate for the client. The client and the Registrant's IAR then work together to select individual money managers to manage the client's assets from a list of pre-screened independent investment advisors. Registrant and/or Envestnet then evaluate and monitor the investment managers and investment vehicles selected for the client on a regular basis. To participate in the SMA Program, the recommended minimum initial investment amount is \$250,000; however, for clients that have a well diversified portfolio and are looking to augment that portfolio with an individual manager within the Program, the minimum may be as low as \$100,000.

(MAS) The Multi-Manager Account Program:

Under the MMA Program, Registrant and Envestnet act as co-advisors in designing and implementing an asset allocation strategy for the client using a single fully-diversified portfolio. Registrant's IARs help clients design an investment strategy adequate to each client by identifying the client's financial circumstances, investment horizon, needs, and objectives. Using Envestnet's analytical tools, the Program then develops an asset allocation strategy and recommends asset managers that it considers the most appropriate to manage each portion of the client's assets based on the client's circumstances. Asset managers are selected from a list of pre-screened independent investment advisors. Registrant and/or Envestnet then evaluate and monitor the investment managers and investment vehicles selected for the client on a regular basis. To participate in the MMA Program, the minimum initial investment amount is \$250,000.

(MAS) The Wrap Strategists Program:

Under the Wrap Strategists Program, Registrant and Envestnet act as co-advisors in designing and implementing an asset allocation strategy for the client using mutual fund or ETF portfolios. Under the

Wrap Strategists Program, Registrant's IARs use Envestnet's proprietary analytical tools to help clients design an investment strategy adequate to each client by identifying the client's financial circumstances, investment horizon, needs, and objectives. The Program then develops an asset allocation strategy and recommends a portfolio of mutual funds or exchange traded funds that it considers the most appropriate for the client. Registrant's IARs then evaluate and monitor the mutual funds and/or ETF's selected for the client on a regular basis. Envestnet provides rebalancing and reallocation services on a discretionary basis. To participate in the Wrap Strategists Program, the minimum initial investment amount is \$50,000.

(MAS) The Representative as Portfolio Manager Program:

Under the Rep as PM Program, Registrant's investment advisor representatives perform the same services as outlined above in the General Securities Account under INCLUSIVE FEE PROGRAMS. This program's requirements are described further in the brochure required by Schedule H (WRP Investments, Inc. WRAP Fee Program Brochure) of this Form ADV.

C.) The Registrants' IARs assist clients in developing investment portfolios tailored to meet their specific investment objectives through the use of the advisory services offered. Through each of the advisory services offered the Registrant's IAR has an initial consultation with a potential client during which such potential client completes a client profile describing his financial means and objectives. Based upon the consultation and client profile, the Registrant/IAR will provide the appropriate advisory service to meet the client's goals and objectives.

The General Securities Account is intended to offer suitable clients a long-term growth approach to investment management based upon their individual investment goals and objectives. The account provides asset allocation, brokerage, portfolio supervision, consolidated reporting and periodic recommendations to clients.

The Mutual Fund Account is intended to offer suitable clients a long-term growth approach to investment management based upon their individual investment goals and objectives through investments in no-load and front-end load-waived mutual fund shares. The account provides asset allocation, brokerage, portfolio supervision, consolidated reporting and periodic recommendations to clients.

The Monitoring Service offers suitable clients an investment program in which clients receive investment management services, including fund allocation using either percentages or fixed dollars for assets under separate custody agreements including variable insurance contracts, directly held mutual funds, and custodians other than with the Registrants brokerage custodian, NFS.

In each instance the investment advisor representative of the Registrant has an initial consultation with a potential client during which such potential client completes a client profile describing his financial means and objectives. Based upon the consultation and client profile, the Registrant/IAR will manage the account by purchasing, selling, and exchanging securities and other investments. The general securities account will be managed by purchasing and selling securities including but not limited to stocks, bonds, mutual funds, ETFs, options, government issued securities, real estate investment trusts, and other securities. The mutual fund account will be managed by purchasing and selling no-load and front-end load waived mutual fund shares. In the monitoring account, the Registrant's IAR will manage the fund allocations using either percentages or fixed dollars for assets under separate custody agreements including variable insurance contracts, directly held mutual funds, and custodians other than with NFS. It is therefore important that the client provides accurate and complete information in the client profile, as failure to do so can affect the services provided. In addition, it is essential that the client promptly inform the Registrant/IAR of material changes to his or her financial circumstances or investment objectives to allow the adviser to manage the account appropriately.

The client may impose restrictions on investing in certain securities or types of securities, however this is not an approved or disapproved investment strategy by the Registrant, and the client should be aware that it can affect the IARs' ability to meet the clients' objectives. At least once per year the IAR and the client will discuss the client's investment objectives and financial requirements.

The Managed Account Solutions platform is intended to offer suitable clients a long-term growth approach to investment management based upon their individual investment goals and objectives through investment in no-load and front-end load-waived mutual fund shares. It contains options similar to the General Securities Account through the "Representative as Portfolio Manager" platform. Other programs may apply to the Managed Account Solutions platform not related to the "Representative as Portfolio Manager" platform's General Securities Account as discussed in Item 4.B. of this ADV Part II. The investment advisor representative of the Registrant has an initial consultation with a potential client during which such potential client completes a client profile describing his financial means and objectives. Upon review of the client profile and a determination of suitability, the client, the IAR, and the Registrant enter into a General Securities Asset Management Agreement – MAS pursuant to which the client opens an advisory and brokerage account with the Registrant whereby the IAR will manage the assets in the account. Once again it is therefore important that the client provides accurate and complete information in the client profile, as failure to do so can affect the services provided. In addition, it is essential that the client promptly inform the Registrant/IAR of material changes to his financial circumstances or investment objectives to allow the adviser to manage the account appropriately.

D.) The Registrant offers portfolio management services through the use of wrap fee programs (General Securities Account and Mutual Fund Account). Through the use of these accounts the Registrant provides personalized and continuous investment advice to the client through a suitable investment vehicle managed by the Registrant's IAR, which is based upon the individual needs, investment goals, and objectives of the client, for an inclusive WRAP fee. Other accounts not serviced under these advisory services may not be provided continuous and personalized advice to the extent provided by the Registrant's WRAP accounts. The Registrant will receive a portion of the inclusive WRAP fee that is agreed upon within the client's advisory account agreement.

E.) The Registrant manages the following amount of client assets on a full discretionary basis as of December 31, 2011:

Discretionary Assets - \$42,455,070.00

The Registrant manages the following amount of client assets on a non-discretionary basis as of December 31, 2011. A portion of less than 6% (\$19,595,450.00) of the non-discretionary client assets were calculated on January 31, 2012 and February 29, 2012.

Non-Discretionary Assets - \$320,816,850.00

[Item 5] Fees and Compensation

A.) The Registrant is compensated for its advisory services separately for each product offering. The compensation methods and fee schedules for each product offering are provided in the following paragraphs.

The Registrant is compensated for its managed WRAP accounts through an inclusive WRAP fee charged every calendar quarter to the General Securities and Mutual Fund Accounts. The maximum fees are set forth below for each of the above named products, although the actual fee is negotiable and will be set forth in the client's agreement.

The General Securities Account

Portfolio Value	Annual Maximum Fee
\$100,000 - \$249,999	3.00%
\$250,000 - \$499,999	2.50%
\$500,000 - \$1,999,999	2.00%
\$2,000,000 +	1.25%

Through the execution of an addendum to the fee arrangement, client may consent to a reduced fee schedule that would allow for the account related costs (including but not limited to: transaction charges, custody costs, account maintenance fees, etc.) to be debited from their account. The costs of these services may vary from time to time. Other than on-going mutual fund 12b-1 fees (if applicable), and the asset management fee, the IAR will not be compensated from the fees being charged to the client under this addendum.

The Mutual Fund Account

Portfolio Value	Annual Maximum Fee
\$25,000 - \$149,999	3.00%
\$150,000 - \$499,999	2.50%
\$500,000 - \$1,999,999	2.00%
\$2,000,000 +	0.75%

Through the execution of an addendum to the fee arrangement, client may consent to a reduced fee schedule that would allow for the account related costs (including but not limited to: transaction charges, custody costs, account maintenance fees, etc.) to be debited from their account. The costs of these services may vary from time to time. Other than on-going mutual fund 12b-1 fees (if applicable), and the asset management fee, the IAR will not be compensated from the fees being charged to the client under this addendum.

The Monitoring Service Account

Portfolio Value	Annual Maximum Fee
\$25,000 +	1.00% (No-Load Annuities, 0.25%-3.00%)

The client will be charged an inclusive fee every calendar quarter for the Monitoring Account Service. The maximum fee is generally 1% (3% for No-Load Annuities), although the actual fee is negotiable and will be set forth in the client's agreement.

Managed Account Solutions

Clients in the Program pay a client fee that includes investment advisory services and brokerage fees. The client fee is paid quarterly in advance and is charged as a percentage of the assets under management, according to the blended fee schedule found below. It is charged at the end of the last trading day in the applicable quarter. Fees are negotiable. The Envestnet/Sponsor Fee and Registrant Fee generally include investment management services, client profiling, strategic asset allocation, style allocation, research and evaluation of asset managers, ongoing monitoring of manager and account performance, asset manager hiring and termination, account rebalancing, account reporting, and other operational and administrative services. The Program/Platform Fee includes fees payable to Envestnet, NFS, and third party Managers/Sub-Managers or Strategists. Accounts are charged a minimum fee annually for participation in the Program. The annual Program/Platform Fees are based on a blended fee schedule outlined in the agreement between the client and Envestnet with maximums outlined below:

- **The SMA Program:** Maximum 3% total fee to the client for account value up to and including \$1,000,000.00. Maximum 2% total fee to the client for account value \$1,000,000.01 or greater.
- **The MMA Program:** Maximum 3% total fee to the client for account value up to and including \$1,000,000.00. Maximum 2% total fee to the client for account value \$1,000,000.01 or greater.
- **The Wrap Strategists Program:** Maximum 3% total fee to the client for account value up to and including \$1,000,000.00. Maximum 2% total fee to the client for account value \$1,000,000.01 or greater.
- **The Representative as Portfolio Manager Program:** Maximum 3% total fee to the client for account value up to and including \$500,000.00. Maximum 2% total fee to the client for account value \$500,000.01 - \$1,000,000.00. Maximum 1.75% total fee to the client for account value \$1,000,000.01 or greater.

The Rep as PM Program maximum fees include a pricing schedule for Sponsor fees through NFS-Envestnet platform for performance reporting and per account billing of:

Portfolio Value	Annual Fee
\$ 50,000.00 – 500,000.00	20 basis points (.20%)
\$ 500,000.01 – 1,000,000.00	14 basis points (.14%)
\$ 1,000,000.01 +	6 basis points (.06%)
Minimum Fee	\$120/year

The total fee to the client will comprise of the Sponsor Fee + Advisor Fee as outlined within the maximums above. Accounts <\$60,000.00 may be subject to the minimum Sponsor fee. WRP/IAR makes no representations or warranties concerning the tax implications concerning fees paid from qualified or IRA accounts or concerning authorization of debiting fees for one account from another. Client is advised to consult with their CPA or tax-preparer.

Through the execution of an addendum to the fee arrangement, the client may consent to a reduced fee schedule that would allow for the account related costs (including but not limited to: transaction charges, custody costs, account maintenance fees, etc.) to be debited from their account. The costs of these services may vary from time to time. Other than on-going mutual fund 12b-1 fees (if applicable), and the asset management fee, the IAR will not be compensated from the fees being charged to the client under this addendum.

Financial Planning and hourly Planning

Fees charged by the IARs for financial planning services are generally based upon actual or estimated hourly charges, which may vary according to the experience and location of the IAR. Hourly fees charged by the IARs generally range from \$50 to \$500. The IARs may quote fixed fees based upon the projected hourly charges to be incurred and the scope and nature of the work to be performed. One half of the total or estimated fee of such IARs is due at the commencement of the engagement, and the balance is due upon presentation of the financial plan.

In addition, Registrant provides similar financial planning services on behalf of its IARs. Registrant charges its IARs a wholesale fee for such services, and the IARs then charge their clients a retail fee for such services that generally ranges from \$150 to \$5000. Under certain circumstances, Registrant may also charge an additional fee based upon actual or estimated hourly charges that generally range from \$50 to \$500.

B.) For the General Securities Account, Mutual Fund Account, Monitoring Service, and financial/hourly planning, the client may authorize the Registrant to deduct management fees directly from the client's assets by authorizing the Registrant to invoice NFS, TD Ameritrade, or any other

custodian appointed by the client. All fees will be noted on the client's brokerage statements or confirmations. The client may also elect to be invoiced directly for the payment of all fees, which the client agrees to pay such fees by separate check within 15 days of receipt of the invoice.

Fees for Managed Account Solutions accounts will be debited directly from the client's assets. The client will not have the option to be invoiced directly for Managed Account Solutions accounts.

For all advisory services other than financial/hourly planning, WRP Investments' advisory fees are billed in advance on a quarterly basis. Fees for financial/hourly planning are billed as services are rendered, or in some cases as an upfront fee.

C.) The client understands that in addition to the WRAP fee paid by the client pursuant to the agreement the client signs, certain investments, including each mutual fund in which the client may invest pursuant to the agreement, also bears its own advisory fees and other expenses. The client further understands that the mutual funds available pursuant to the agreement may be available directly from the funds pursuant to the terms of the fund's prospectus and without the additional fees hereunder.

Certain mutual funds (and/or their related persons) in which the client may invest make payments to broker/dealers. Such payments may be distributed pursuant to a 12b-1-distribution plan or pursuant to another arrangement as compensation for distribution or administrative services and may be paid out of the fund's assets. The Registrant may receive such fees or other compensation to the extent permitted by law. A fund that imposes a front-end sales charge but which waives that front-end sales charge for purchases made on behalf of the account (a "front-end load-waived" fund) may bear 12b-1 distribution or service fees in excess of .25% of the account's net assets (the maximum allowed for no-load funds). Because of these compensation arrangements, a conflict of interest exists in connection with the recommendation of particular investments for the account. The Registrant and its IARs are subject to and intend to comply with standards of fiduciary duty requiring the Registrant and the IAR to act solely in the best interest of the client when making investment recommendations. With respect to investments in mutual funds on behalf of clients subject to ERISA, Registrant will credit the aggregate amount of service fees and other compensation paid by the mutual funds that are attributable to such ERISA client's account for the previous quarter against the inclusive fee paid pursuant to the General Securities Account or Mutual Fund Account agreement. The 12b-1 and other fee arrangements will be disclosed upon request of the client and are typically described in the applicable fund's prospectus. The client should understand that in addition to the wrap fee paid by the client, certain individual investments such as exchange traded funds may also bear their own management fees and/or expenses.

If a client's management account is approved for trading on margin and the client has entered into a margin agreement with NFS or TD Ameritrade, NFS or TD Ameritrade may charge the client interest on any credit extended to or maintained by the client. The Registrant has an arrangement with NFS pursuant to which it will receive consideration for any debit or credit balance maintained in the account. Such consideration is in addition to the fee paid under the client's management agreement.

Through the execution of an addendum to the fee arrangement, the client may consent to a reduced fee schedule that would allow for the account related costs (including but not limited to: transaction charges, custody costs, account maintenance fees, etc.) to be debited from their account. The costs of these services may vary from time to time. Other than on-going mutual fund 12b-1 fees (if applicable), and the asset management fee, the IAR will not be compensated from the fees being charged to the client under this addendum.

The Registrant directs customer's orders in equity securities to exchanges and market makers on the Registrant's analysis of their ability to provide rapid and quality execution. These market participants

guarantee that all customer orders are executed at a price equal to or better than the displayed national best bid and offer. The Registrant's policy also assures that these market participants provide client orders with price improvement and limit order protection. The Registrant may receive remuneration for directing customer orders to certain market participants. Such remuneration typically consists of a rebate of \$.01 to \$.02 per share or comparable consideration. More of a description of such arrangements is available upon request.

If the Account is under the minimum account size and the Registrant does not exercise its right to close the account, the account may be subject to a maintenance fee of \$25.00 per quarter.

NFS or such other custodian as is selected by the client may charge IRA accounts certain fees in addition to the fee charged under this agreement.

Clients can find additional information pertaining to brokerage practices in Item 12 (Brokerage Practices) of this ADV Part II A Brochure.

D.) For all advisory services other than financial/hourly planning, the Registrant's advisory fees are billed, and must be paid, in advance on a quarterly basis. The wrap fee is payable quarterly in advance and upon deposit of any funds or securities in the client account. The first payment is due upon acceptance of the client's account by the Registrant and is based upon the opening value of the account. The first payment is prorated to cover the period from the date the account is opened through the end of that calendar quarter. Thereafter, the wrap fee is based upon the fair market value of the assets in the account on the last business day of the preceding calendar quarter, as calculated by NFS, and is due the first business day of the then-current calendar quarter.

A client's advisory agreement may be terminated by the Registrant or the client at any time upon written notice to the Registrant or the client, as applicable. The agreement will also terminate upon the death of the client(s). If the client terminates an agreement within five (5) business days after the agreement has been signed by the client and the IAR, and has been accepted by the Registrant, the client will receive a full refund of all fees. If the agreement is terminated after five (5) business days of its signing and acceptance, the client shall be entitled to a pro rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which notice of termination is received, subject to reduction by any early termination fee that may be in accordance with the said agreement. The refund will be deposited back into the client account, or if paid directly, a refund check will be mailed to the client's address of record. Termination of the agreement shall not affect liabilities or obligations incurred or arising from transactions initiated to the agreement prior to such termination, including the provision regarding arbitration, which shall survive any expiration or termination of the agreement.

E.) The Registrant, through its Registered Representatives who may act as IARs on behalf of the client, may accept compensation for the sale of securities or other investment products in association with the representatives' registration as Agents of the Registrant's Broker/Dealer.

- 1.) Because of these compensation arrangements, a conflict of interest can exist in connection with the recommendation of particular investments for the client account. This conflict arises from the incentive to recommend investment products based upon the compensation received, rather than on a client's needs. However, the Registrant and its IARs are subject to and intend to comply with standards of fiduciary duty requiring the Registrant and the IAR to act solely in the best interest of the client when making investment recommendations. The Registrant does not typically allow its representatives to charge both a commission and advisory fee for the products sold in its advisory accounts. However, the Registrant may accept service fees

from certain mutual funds in which the client may invest through the advisory account. The client will be made aware of this compensation method and conflict of interest in both the management agreement signed by the client, within this Form ADV Part II A, and within the Registrant's WRAP Fee Program Brochure. With respect to investments in mutual funds on behalf of clients subject to ERISA, Registrant will credit the aggregate amount of service fees and other compensation paid by the mutual funds that are attributable to such ERISA client's account for the previous quarter against the inclusive fee paid pursuant to the General Securities Account or Mutual Fund Account agreement. The 12b-1 and other fee arrangements will be disclosed upon request of the client and are typically described in the applicable fund's prospectus. For clients under a WRAP account agreement investing in mutual funds, no-load mutual funds will be recommended.

- 2.) Clients have the option to purchase investment products offered by the Registrant through other brokers or agents that are not affiliated with the Registrant.
- 3.) Revenue received by the Registrant, from advisory clients, resulting from commissions and other compensation for the sale of investment products recommended does not total more than 50% of total revenue. The Registrant's fee based revenue is primarily attained through advisory fees.
- 4.) The Registrant does not typically charge advisory fees in addition to commissions or markups.

[Item 6] Performance-Based Fees & Side-By-Side Management

The Registrant, which includes its investment advisor representatives, does not charge or accept performance based fees.

[Item 7] Types of Clients

The Registrant generally provides advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations or business entities.

The Registrant requires the following minimum account sizes for each of the corresponding advisory products. All of the advisory product minimums are subject to the discretion of the Registrant. In the case of products offered through the Managed Account Solutions (MAS) platform, product minimums are subject to the discretion of the underlying manager.

WRP WRAP Account Agreements	
General Securities WRAP Account	Minimum \$100,000.00
Mutual Fund WRAP Account	\$ 25,000.00
Monitoring Service Agreements	
Monitoring Service	\$ 25,000.00
Managed Account Solutions Accounts	
The SMA Program	\$100,000.00
The MMA Program	\$250,000.00
WRAP Strategists Program	\$ 50,000.00
Rep as Portfolio Manager Program	\$ 50,000.00

[Item 8] Methods of Analysis, Investment Strategies, and Risk of Loss

A.) The Registrant applies charting, fundamental analysis, technical analysis, and cyclical analysis as methods of analysis used when formulating investment advice for clients. The Registrant also applies long and short term purchases of securities, trading (securities sold within 30 days), margin, and options writing, which includes covered options, uncovered options, or spreading strategies, as investment strategies used to implement investment advice given to clients. Each IAR of the Registrant may apply his or her own assimilation of analysis and investment strategies in the formulation of investment advice to the client. Investing in securities involves risk of loss that clients should be prepared to bear. The client should recognize that there is no assurance of the accuracy of the Registrant's recommendations and that any market losses resulting from such recommendations are normal market risks and the risks of the client.

B.) The client should recognize that there can be material risks involved with specific investment strategies utilized by the Registrant. Short-term purchases of securities (less than 1 year) and trading (securities sold within 30 days) may be considered higher risk and more volatile than long term investing because of the unpredictability of many factors that can affect share prices and interest rates in the short term market. Clients should also take into consideration the tax consequences of short-term holdings as compared to long-term investing, which may have an adverse affect on earnings. The Registrant suggests that a client consult with his/her tax consultant regarding these tax issues.

The client should also understand that using margin as an investment tool is considered more of a risk than normal investing, as leveraging a security can amplify the risk or reward of a position. By amplifying the risk of an investment position, the risk of potential and realized investment losses increases. Margin should be considered with caution as to the client's investment experience and objectives.

The client should also recognize that options trading can involve risks that are not suitable for all investors, and can be speculative in nature. Options trading can be used for multiple purposes including hedging an investment position or for speculation. In the latter, options trading can become high risk do to the unpredictability of many factors that can affect share prices and interest rates in the short term market. Once again, the use of options should be considered with caution as to the client's investment experience and objectives.

IARs of the registrant may or may not use the investment strategies listed above for management of his or her clients' accounts. Each IAR of the Registrant may apply his or her own assimilation of analysis and investment strategies in the formulation of investment advice to the client to best meet the client's investment goals and objectives. The Registrant's IARs will take into consideration the client's investment objectives, experience, risk tolerance, and financial means when establishing an investment strategy for each client. Some investment strategies may be implemented that use frequent trading activity, which can affect investment performance, particularly through increased brokerage transaction costs and taxes.

C.) Though there will be specific securities that are best suitable for particular clients, and will be used in the best interest of the client to meet the client's investment objectives, the Registrant offers a wide range of investment vehicles to its clients and does not primarily recommend a particular type of security.

[Item 9] Disciplinary Information

A.) The Registrant does not have disciplinary information to report for this item.

[Item 10] Other Financial Industry Activities and Affiliations

A.) WRP Investments, Inc. ("Registrant") is registered as a broker/dealer with the Financial Industry Regulatory Authority (FINRA) and Securities Investor Protection Corporation (SIPC), as well as being registered as an Investment Advisor with the United States Securities and Exchange Commission. Both principal owners, David M. Pintaric and William R. Pintaric Jr., are broker/dealer agents of the Registrant.

B.) The Registrant, and its management persons, are not registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or are an associated person of the foregoing entities.

C.) The Registrant is a registered broker/dealer and, as such, effects securities transactions for clients, typically through NFS as clearing agent. The Registrant is also registered as a municipal and government securities dealer. The principal business of the Registrant is as a fully disclosed broker/dealer selling a wide variety of securities products for commissions. The Registrant provides a variety of services in its capacity as a broker/dealer, including rendering advice as to the value or advisability of purchasing or selling securities, without receiving special compensation and solely incidental to its brokerage business. The principal business of the Registrant's executive officers is the day-to-day management of its broker/dealer activities. The Registrant is also registered as an Investment Advisor under the United States Securities and Exchange Commission.

Registered Representatives of the Registrant may hold licenses or registrations other than their securities licenses offered through the principal business of the Registrant, and therefore, may be designated as or have a relationship with an accountant or accounting firm, lawyer or law firm, insurance company or agency, or pension consultant.

D.) Registrant sponsors programs in which a registered investment advisor (RIA) other than the Registrant is responsible for providing investment advisory services. The RIA or its IARs are typically broker/dealer representatives of the Registrant. In these programs the Registrant typically acts as a broker for transactions, and clears all transactions through NFS. Clients typically enter into an agreement with the RIA for advisory services and with the Registrant for brokerage services. Such RIAs and their IARs may also provide services to investment companies or be affiliated with an insurance company or agency, and may be financial planners and pension consultants.

Registrant has relationships with various unaffiliated RIAs to offer their services to Registrant's brokerage clients. As a result of these relationships, Registrant receives compensation in exchange for introducing its clients to such unaffiliated RIAs. Registrant may share a portion of the compensation with its IARs. Registrant typically receives a percentage of the fee charged to the client by the unaffiliated RIA for its services, which fees are typically based upon assets under management. The relationship of the Registrant, the Registrant's IARs, and the RIA is clearly communicated to all relevant clients in an agreement signed by the client and in a disclosure statement provided by the RIA.

Registrant currently has or intends to engage in business with: 2nd Market Capital Advisory Services, Absolute Capital, Advisors Asset Management, Algonquin Advisors, Aris Advisers, Beacon Capital Management, Bellatore Financial Inc., BNY Mellon Private Wealth Management, Brinker

Capital, BTS Asset Management, California Investment Trust, Cincinnati Asset Management, Clark Capital Management Group Inc., CLS Investment Firm LLC., Comprehensive Capital Management Inc., Cornerstone Asset Management, Curian Capital, Daily Access/InterServ, Dividend Growth Advisors, Envestnet Asset Management Inc., First Point Advisors, Flexible Plan, Forward Management LLC., Foy Financial Services, Geneva Partners LLC., Genworth Financial Wealth Management Inc., Gustafson Baxter Financial Services Inc., Hanlon Investment Management, Icon Advisers Inc., Investment Timing Services, Karpus Investment Management, LBS Capital Management, Lockwood Financial Asset Management, Lorence & Vander Zwart, Managers Choice, Manning & Napier Advisory Corporation, Meeder Advisory Services, Mench Financial, Modern Portfolio Management Inc., Morningstar Investment Services Inc., Muhlenkamp and Company Inc., MVP Management, Nationwide Best of America Advisory Services, Neuberger Berman, Niemann Capital Management Inc., OAM Avatar, LLC., Ocean Park Asset Management, Portfolio Strategies, Potomac Fund Management, PTS Asset Management, Reale Managed Assets, Reinhart Asset Management LLC., Resnick Investment Advisors LLC., Rincon Pacific Management Inc., Rivernorth Capital Management Inc., SEI Corporation, Sowell Management Services, Sterne Agee Asset Management Inc., Stonebridge Capital Advisors, Symmetry Partners LLC., The Retirement Plan Company LLC., TOEWS Corporation, Tower Wealth Management, Unified Trust Company, USA Wealth Management, Vantage Investment Advisors LLC, and Wilbanks, Smith, and Thomas.

Subject to applicable law and regulations, Registrant pays compensation to its broker-dealer representatives for brokerage clients introduced to unaffiliated RIAs, as set forth above.

[Item 11] Code of Ethics, Participation/Interest in Client Transaction/Personal Trading

A.) The Code of Ethics (“Code”) has been adopted by the Registrant and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940. The Code is based upon the principle that the Registrant, its officers, and employees owe a fiduciary duty to the clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid serving their own personal interests ahead of clients and any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. Clients and prospective clients can obtain a copy of the Code of Ethics by making a request to the Registrant’s Compliance Department. The Registrant’s contact information is; 4407 Belmont Ave Youngstown OH 44505; phone (800)589-2023; fax (330) 759-2046.

B.) The Registrant, its principals, and IARs may buy and sell securities for themselves or hold positions in the same securities that are recommended to clients. Because of this issue, a conflict of interest may exist for the Registrant, its principals, or IARs, to use privileged information for personal gain. The Registrant imposes the following restrictions regarding this potential conflict of interest:

- 1.) Transactions, for the Registrant or its principals or IARs, can only be effected after reasonable attempts have been made to contact clients for approval to execute transactions where discretion is not granted; and to only effect trades after all client transactions in the same securities have been completed when discretion is authorized; and
- 2.) All Registrant’s officers, employees and IARs are required to file quarterly transaction reports and annual holdings reports with the Registrant indicating all securities transactions and holdings in their own accounts as well as in accounts in which they have any equitable or beneficial interest. Registrant reviews these reports on a quarterly and annual basis.

Although certain of the Registrant’s IARs purchase or sell securities that they recommend to clients, such purchases and sales are effectuated in accordance with our Insider Policy and Code of Ethics. Employees are required to report all personal transactions to us, and we review such reports regularly. In

order to ensure that each of the Registrant's officers, employees and IARs strictly adheres to the highest standards of conduct and integrity in conducting business on behalf of our clients, we have all officers, employees and IARs sign our Code of Ethics. In the case that a conflict does arise, the Registrant reserves the right to take corrective action to ensure that all clients are given fair treatment and value for transactions executed, and to ensure the Registrant continuously provides a compliant fiduciary duty to clients in such a manner as to avoid serving personal interests ahead of the clients'.

[Item 12] Brokerage Practices

A.) In order to insure that clients obtain reasonable pricing on their transactions, the Registrant works with National Financial Services (NFS) and TD Ameritrade Institutional (TD Ameritrade) to require that the client receives "best execution" on his/her trades. This will mostly apply to the Registrant's General Securities accounts, as mutual funds are priced by definition at the close of each day, and not as individual securities. The Registrant will at times use an outside firm to place trades for clients, usually for bond transactions and lower priced individual securities. The Registrant periodically reviews the execution capabilities of NFS and TD Ameritrade to better ensure clients of the Registrant are receiving efficient order execution quality. The Registrant has chosen to entrust NFS and TD Ameritrade as custodians for its clients' accounts based upon the technological resources, order efficiency, and familiarity that the custodians provide to the Registrant and its clients.

NFS provides the following to the Registrant for brokerage practices:

Orders submitted to National Financial Services LLC (NFS), manually or electronically, are sent to a market place for execution. All orders are monitored for price improvement and execution quality. The type of trade determines where it is executed. NFS uses a variety of marketplaces to execute orders. Each CUSIP is registered on the FBSI Security Master file with a two-letter marketplace routing code. Orders entered into an NFS system are then routed to the designated marketplace. If NFS routes an order to a regional exchange, NFS receives the same price it would have received on the New York (NYSE) or American Stock Exchanges. Pricing on the regional exchange is regulated by the SEC and primary exchanges so that it is not discriminatory.

In addition to the exchanges and NASDAQ dealers, NFS uses several automated systems, designed by the marketplaces, to quickly and efficiently handle small retail orders. NFS considers the marketplace with the largest trading volume in a security, along with the marketplace that gives the most accurate executions and fastest execution reports when choosing a marketplace or system:

NFS uses the NYSE DOT system to route certain listed block orders directly to the floor of the NYSE. Listed equity orders greater than 19,999 shares are generally routed to the NFS Block Desk. Option orders greater than 100 contracts are routed to the NFS Block Desk

Certain types of orders are not suitable or eligible for an automated execution system and may include minimum lot orders, limits or markets on the close, pink sheet stocks, bonds, treasuries, large option orders, or orders that have been specifically routed to the NFS Block Desk, NASDAQ Desk, or New York Order Room.

TD Ameritrade provides the following to the Registrant for brokerage practices:

We pursue the highest quality order execution with the various market centers. And because TD Ameritrade is one of the largest order routers in the industry, we're able to analyze thousands of market orders and put our knowledge to work for you every time you place a trade. We

route orders through our proprietary, sophisticated order-routing technology, which allows us to dynamically distribute orders to multiple market centers in an effort to obtain best execution. In addition, we continually and routinely monitor our execution quality to make improvements that will benefit our clients. We employ many metrics, including price, speed, liquidity and opportunities for price improvement, to assure that order flow is directed to markets that provide best execution for our clients.

If your order executes at a price outside the National Best Bid and Offer (NBBO) and isn't justified, we may take action and request a price adjustment from the market center. Some prices outside the NBBO are justified due to market volatility or trade volume. That's why we consistently monitor trades to identify those executed outside the NBBO and look for opportunities to improve the price you receive.

Regular market session trading occurs from 9:30 a.m. - 4:00 p.m. ET. Depending on the security and the manner in which submitted, TD Ameritrade routes all marketable orders for National Market System securities (NASDAQ, NYSE and AMEX), received prior to 9:28 a.m. ET, to either the primary market center or destinations that participate in the NASDAQ Opening Cross (NOOP). NASDAQ uses the NOOP process to centralize order handling and provide a single and transparent price for the market open on all NMS securities. Orders received after 9:28 a.m. ET until all markets are open are handled on a best efforts basis which may include participation in a NYSE or AMEX opening print.

Market on Close (MOC) orders are market orders designed to execute at the close of the market. TD Ameritrade accepts MOC orders until 3:40 p.m. ET. For Listed MOC orders, market centers utilized by TD Ameritrade execute at the last print of the day. For NASDAQ MOC orders, market centers utilized by TD Ameritrade execute at the NASDAQ Official Closing Price (NOCP).

B.) The Registrant is able to perform a block transaction and allocation for certain securities, and typically only performs this function for specific client accounts when requested by the IAR presiding as manager over such specific accounts. The registrant does not typically have the opportunity to perform such transactions for client accounts when the transaction is not requested by the IAR, as all client accounts typically do not require a transaction for the same security at the same given time. If this opportunity is missed by the IAR and the Registrant, there are no additional transaction costs to clients by not providing this allocation service, as the transaction costs would be the same. However, the possibility exists that clients may receive different execution prices by not participating in a block allocated trade.

[Item 13] Review of Accounts

A.) Principals of the Registrant review client accounts to whom it and its IARs provide investment advice on a periodic basis. Such reviews include monitoring whether the IAR is complying with applicable laws and regulations, and whether the IAR is reviewing all new account forms for appropriate disclosure of the client's financial means and goals prior to execution of any transactions for the account. Registrant also reviews the trading in clients' accounts to ensure that the investment recommendations are suitable. The Registrant's IAR reviews client account statements at least quarterly. The IAR and the client shall discuss, at least once per year, the investment objectives and financial requirements of the client.

Where investment advice is provided by an RIA other than the Registrant, or an IAR of such other RIA, Registrant's supervisory function is limited to supervising the broker/dealer activities of its representatives. Registrant reviews new account forms and suitability determinations. For these clients,

the other RIA is responsible for reviewing the advisory activities in the accounts, as described in Form ADV of such RIA.

B.) A client account may be reviewed more than on a periodic basis. The review of an account may be triggered by trading activity that is considered to be unsuitable for the client based upon the objectives set fourth by the client, security transactions placed over certain dollar amount thresholds, or irregular trading activity.

C.) For each month in which there is activity in the account, or if there is no activity, on a quarterly basis, the client will receive an account statement that includes a summary of transactions, an inventory of holdings, and other transaction information. The client also receives a confirmation of each transaction executed in his/her account. The account statements and transaction confirmations are electronically generated by the custodian of the account, National Financial Services.

[Item 14] Client Referrals and Other Compensation

A.) The Registrant has relationships with various unaffiliated RIAs to offer their services to the Registrant's clients. As a result of these relationships, Registrant receives compensation in exchange for introducing its clients to such unaffiliated RIAs. By entering an agreement with an unaffiliated RIA, the Registrant's clients agree to also become a client of the unaffiliated RIA. Registrant may share a portion of the compensation it receives with its IARs. Registrant typically receives a percentage of the fee charged to the client by the unaffiliated RIA for its services, and the fee is typically based upon assets under management. The relationship of the Registrant, the Registrant's IARs, and the RIA is clearly communicated to all relevant clients in an agreement signed by the client and in a disclosure statement provided by the unaffiliated RIA.

B.) The Registrant pays referral fees (non-commission) to independent solicitor(s) (non-registered representatives) for the referral of their clients to the Registrant in accordance with rule 206 (4)-3 of the Investment Advisors Act of 1940. In this regard, the Registrant will maintain solicitors' agreements in compliance with Rule 206 (4)-3 of the Investment Advisors Act of 1940 and applicable state and federal laws. All clients referred by solicitor(s) to the Registrant will be given full written disclosure describing the terms and fee arrangements between the Registrant and its solicitor(s). Currently, the Registrant holds such solicitors' agreements with the following independent solicitor(s): Odell & Critchley, P.C.

[Item 15] Custody

A.) The Registrant does not take custody of client assets. Registrant has an arrangement with National Financial Services (NFS) and TD Ameritrade Institutional (TD Ameritrade) to provide clearance and custody services for accounts. Upon opening an account, the Registrant introduces the client to NFS or TD Ameritrade as clearing agent on a fully disclosed basis. NFS or TD Ameritrade will act as a sole custodian for all assets in the accounts and will perform all custodial functions, such as crediting of interest and dividends on account assets and other custodial functions customarily performed with respect to securities brokerage accounts, unless the client has appointed another custodian to perform all or part of such services pursuant to a separate custody agreement. NFS or TD Ameritrade will supply the client with custodial account statements on a monthly basis with account activity, and always on a quarterly basis when no account activity exists. Clients retain ownership of all cash, securities and other instruments in their accounts. Clients may also receive consolidated statements from the Registrant, in addition to the custodial statements provided by NFS or TD Ameritrade, for the services provided through the advisory agreements entered into by the client. The Registrant strongly urges its clients to compare the

account statements they receive from NFS or TD Ameritrade to any consolidated statements received from the Registrant or its IARs.

[Item 16] Investment Discretion

A.) The Registrant, through the execution of a discretionary disclosure form signed by the client, can accept discretionary trading authority to manage a client's securities account. The Registrant's advisory contracts include limited discretionary trading authority, as formulated in the written text of each agreement. However, the client may appoint the Registrant with full discretionary authority through the execution of the Full Discretionary Trading Authorization Form.

The Registrant defines full discretionary authorization as full discretionary trading authority only, which may differ from other industry firms' or the industry's definition. This authority will appoint full discretion, power, and authority to sell, purchase, exchange, convert, tender, trade or otherwise acquire or dispose of stocks, bonds, government issued securities, mutual funds, exchange traded funds, and any other securities of a client account. This authority does not appoint the power to move, transfer, or relocate client funds or assets from the client account.

[Item 17] Voting Client Securities

A.) WRP Investments does not accept authority to, nor votes client securities. Clients will receive proxies from National Financial Services, or a third party vender selected by National Financial Services to deliver proxies and related material. Clients may contact their investment advisor representative for questions pertaining to a particular solicitation.

[Item 18] Financial Information

A.) The Registrant's advisory fees are generally billed quarterly (three months) in advance. The Registrant does not require prepayment of fees six months or more in advance.

B.) The Registrant does not have a financial condition that would impair the ability of the firm to meet contractual commitments to clients.

C.) The Registrant has not been the subject of a bankruptcy petition at any time.

[Item 19] Requirements for State-Registered Advisers

A.) The Registrant is a federally registered investment advisor. This item is not applicable to the Registrant. Registration does not imply a certain level of skill or training.

For questions regarding this brochure, please feel free to contact your investment advisor representative at any time. If you feel the need to contact the Registrant directly, please find contact information for WRP Investments, Inc. on the cover page of this brochure.