

# West Wind Wealth Management, LLC

## Client Brochure

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*This brochure provides information about the qualifications and business practices of West Wind Wealth Management, LLC. If you have questions about the contents of this brochure, please contact us at (757) 619-0456 or [george@invest-it-yourself.com](mailto:george@invest-it-yourself.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 West Wind Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The firm's CRD number is 149370. Registration does not imply a certain level of skill or training.*

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## Item 2: Material Changes

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There are no material changes in this brochure since West Wind Wealth Management, LLC's last annual update, which was filed 3/24/2011.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### A. Description

West Wind Wealth Management, LLC (West Wind) has been in business since January 20, 2009. The principal owner is George Watkins.

### B. Types of Advisory Services

#### *Internet Clients*

West Wind serves internet clients by providing personalized portfolio recommendations through its interactive website, [www.invest-it-yourself.com](http://www.invest-it-yourself.com). Users take an online risk questionnaire, select a Portfolio Calculator depending on their desired level of complexity, and receive a recommended portfolio by email. Recommendations are based solely on the user's responses to our online risk questionnaire, and consist primarily of index-based mutual funds and ETFs.

#### *Full-Service Clients*

West Wind offers an Investment Supervisory Service. This service includes, but is not limited to, the following: risk assessment, Investment Policy Statement drafting, asset allocation, asset selection, periodic portfolio monitoring and rebalancing.

West Wind typically designs a portfolio based on a client's responses to our Risk Questionnaire and personal interviews. We document the client's investment objectives, risk profile, and target allocation in an Investment Policy Statement (IPS). West Wind has discretionary authority to select securities and execute transactions without the permission of clients, but we typically request approval for all transactions (see Item 16 for more detail on investment discretion).

#### *Hourly Clients*

West Wind offers some of the services available to Full-Service Clients, such as risk assessment, Investment Policy Statement drafting, asset allocation, and asset selection, on an hourly basis in certain situations.

### C. Client-Tailored Services

West Wind offers the same services to all of its clients. However, specific investment recommendations depend upon each client's risk profile.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent West Wind from properly servicing the client account, or if the restrictions would require West Wind to deviate from its standard suite of services, West Wind reserves the right to terminate the relationship.

#### D. Wrap Fee Programs

West Wind does not participate in any wrap fee programs.

#### E. Amounts Under Management

West Wind has the following assets under management as of March 9, 2012:

Discretionary Accounts: \$1,600,000

Non-Discretionary Accounts: \$0

## Item 5: Fees and Compensation

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#### A. Fee Schedule

##### *Internet Clients*

We typically charge the following fees for the personalized portfolio recommendations available through Invest-it-Yourself.com:

<b>Portfolio Calculator</b>	<b>Flat Fee</b>
Standard	\$40
Advanced	\$70
Premier	\$100

The fees listed are estimates only and may change temporarily for promotional purposes, but the prices posted on the website at the time of the recommendation are not negotiable. Payment by credit card is due and payable upon electronic transmission of the portfolio recommendation. If a client wishes to terminate the advisory relationship prior to the automatic expiration one week following recommendation transmission, he or she may do so by providing written notice.

##### *Full-Service Clients*

We charge fees to our full-service clients in accordance with the following schedule:

<b>Assets Under Management</b>	<b>Annual Fee</b>
Less than \$250,000	1.00%
\$250,000-\$1,000,000	0.75%
Greater than \$1,000,000	0.50%

Clients are billed in arrears at the beginning of the calendar quarter following account establishment and every other quarter thereafter. Assets under management are defined per the client agreement, generally as the weighted average monthly balance of a client's accounts over the billing period. Fees are not deducted directly from client accounts. The fees listed are estimates only; all fees are negotiable.

*Hourly Clients*

Our minimum hourly rate is \$150; this rate is non-negotiable. Clients are billed by mail after services are rendered.

B. Payment of Fees

West Wind does not deduct fees directly from clients' assets.

*Internet Clients*

Payment by credit card is due and payable upon electronic transmission of the portfolio recommendation.

*Full-Service Clients*

Clients are billed in arrears at the beginning of the calendar quarter following account establishment and every other quarter thereafter.

*Hourly Clients*

Clients are billed by mail after services are rendered.

C. Other Fees and Expenses

Clients are responsible for the payment of all third party fees (e.g., custodian fees, mutual fund fees, transaction fees, etc). Those fees are separate and distinct from the fees and expenses charged by West Wind. Please see Item 12 of this brochure for more information about brokerage practices.

D. Prepayment of Fees

West Wind does not require prepayment of fees.

E. Outside Compensation

Neither West Wind nor its supervised persons accepts any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

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West Wind does not accept performance-based fees or any other fees based on a share of capital gains or on capital appreciation of the assets of a client.

## Item 7: Types of Clients, Minimum Account Requirements

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West Wind generally provides investment advice and/or investment supervisory services to individuals and high-net-worth individuals.

The Portfolio Calculators available through Invest-it-Yourself.com require a minimum portfolio size of \$10,000 to function properly, so we do not offer advice to internet-based clients with less than \$10,000 to invest. Additionally, SEC regulations limit the number of non-internet clients that we may serve in a given year. As a result, we may refuse service to certain full-service clients based on account size, location, or other reasons.

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

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### A. Methods of Analysis and Investment Strategies

West Wind believes in an index-based investment approach that emphasizes accurate risk assessment, intelligent asset allocation, tax efficiency, cost minimization, and disciplined implementation. Our portfolio recommendations are driven by a client's long-term financial goals, not by market timing or stock selection. A typical client following this approach holds a broadly-diversified set of securities for several years and only trades in and out of securities when market movements cause the client's portfolio to become inconsistent with his or her risk profile.

We aim to construct a well-diversified portfolio that maximizes the client's expected return based on his or her risk capacity for and attitude towards risk. For non-internet, full-service clients, we also attempt to execute the portfolio purchase at the lowest possible cost to the client and maintain the portfolio by conducting periodic rebalancing to account for changes in market conditions and the client's risk profile.

We gather historical return, standard deviation, and asset class correlation information from Standard and Poor's, the Federal Reserve, other financial websites, and publicly available sources.



*Investing in securities involves a risk of loss that clients should be prepared to bear.*

B. Material Risks Involved

Many of the portfolio techniques that we use are based, in some part, on the past performance of various asset classes. Clients must be aware that past performance is not a guarantee of future results.

C. Risks of Specific Securities

West Wind generally pursues investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

## Item 9: Disciplinary Information

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There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory firm or the integrity of our management.

## Item 10: Other Financial Industry Activities and Affiliations

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A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither West Wind nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither West Wind nor its representatives are registered as a FCM, CPO, or CTA.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interest

Neither West Wind nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Compensation for Recommending Other Advisors or Managers

West Wind does not utilize or select other advisors or third party managers. All assets are managed by West Wind.

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

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A. Code of Ethics

West Wind has a written Code of Ethics that describes our core values in addition to outlining our strict ethical standards in areas such as compliance, conflicts of interest, gifts, prohibited trades, interest in client transactions, record keeping, and privacy. West Wind will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Recommendations Involving Material Financial Interests

West Wind does not recommend that clients buy or sell any security in which a person related to West Wind has a material financial interest.

C. Investing in the Same Securities as Clients

West Wind employees may buy or sell for themselves securities that they recommend to clients. Due to the size and nature of employee investments (relatively small investments in open-end mutual funds and exchange-traded funds), an employee transaction materially impacts a client account only in very rare instances. However, if any potential does exist for a personal transaction to materially impact a client account, we document the potential conflict, and always place the client's needs ahead of our own when executing the transaction.

D. Trading Personal Securities and Client Securities at or Near the Same Time

West Wind employees may buy or sell securities for themselves at or around the same time as client securities. Due to the size and nature of employee investments (relatively small investments in open-end mutual funds and exchange-traded funds), an employee transaction materially impacts a client account only in very rare instances. However, if any potential does exist for a personal transaction to materially impact a client account, we document the potential conflict, and always place the client's needs ahead of our own when executing the transaction.

## Item 12: Brokerage Practices

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### A. Factors Used to Select Custodians and/or Broker/Dealers

For clients in need of brokerage or custodial services, West Wind recommends The Vanguard Group and its affiliates. The primary basis for this recommendation is that Vanguard shares our philosophy of low-cost, index-based investing. As a result, Vanguard offers a superior selection of low-cost, index-based mutual funds and ETFs that can be purchased without transaction fees, thus allowing us to execute the purchase of a portfolio at the lowest possible cost to the client. The value of Vanguard's research and other services is not a factor in this recommendation.

We have no affiliation with Vanguard or any of its employees, nor do we receive any goods or services in exchange for this recommendation. In some cases, clients may pay commissions higher than those of other brokers in order to have access to Vanguard's products and services.

#### 1. Research and Other Soft Dollar Benefits

West Wind does not receive research, products, or services other than execution from a broker-dealer in connection with client securities transactions.

#### 2. Brokerage for Client Referrals

West Wind receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Directed Brokerage

West Wind does not allow its full-service clients to specify a broker-dealer to execute transactions; clients must use our recommended custodian (The Vanguard Group). Not all advisors require their clients to direct brokerage. By requiring clients to use our specific custodian, West Wind may not be able to achieve most favorable execution at all times, and clients may pay commissions that are higher than another custodian.

Internet and hourly clients may choose any broker that they wish; West Wind does not typically execute transactions for these clients.

### B. Block Trading

West Wind does not generally block trade purchases across client accounts. While block trading can provide a cost savings to clients, we do not feel that our clients are at a disadvantage due to the best execution practices of our custodian.

## Item 13: Review of Accounts

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### A. Frequency and Nature of Account Reviews

The President of West Wind, George Watkins, reviews each client's account at least monthly (typically weekly) to ensure that a client's assets are allocated in accordance with the target ranges previously agreed upon.

### B. Non-Periodic Reviews

Non-periodic account reviews can be triggered by any market event that causes reasonable suspicion that a client's assets are no longer allocated according to the target ranges previously agreed upon, or by a change to the client's financial situation that materially impacts his or her risk profile (e.g., retirement, inheritance, or employment change).

### C. Regular Reports Provided to Clients

West Wind sends full-service clients an annual electronic report at the beginning of the calendar year describing an overall view of the previous year's market movements, individual security and overall portfolio performance, and fees charged throughout the year. Quarterly statements and trade confirmations are delivered to clients by the account custodian. Internet and hourly clients do not receive regular reports.

## Item 14: Client Referrals and Other Compensation

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### A. Economic Benefits From Third Parties

West Wind does not receive any direct or indirect benefits from any third party for advice given to West Wind clients.

### B. Compensation to Non-Advisory Personnel for Client Referrals

West Wind does not directly or indirectly compensate any person who is not our supervised person for referring full-service clients.

West Wind may enter into marketing agreements with online search providers or other online marketing organizations in order to refer potential internet clients to our website.

## Item 15: Custody

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West Wind does not take custody of client accounts at any time. Custody of client accounts is typically held at The Vanguard Group. Clients will receive account statements and trade confirmations directly from Vanguard; they should review these documents carefully.

## Item 16: Discretion

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Full-service clients often grant West Wind, through a limited power of attorney or similar agreement, the authority to independently determine specific securities and the amounts thereof to be bought and sold. We obtain client consent prior to exercising this authority unless the trade in question is deemed discretionary solely because of an amount less than \$10.00.

At no time do we have the authority to withdraw funds or securities from a client's account, sign checks on a client's behalf, deduct fees or expenses directly from a client's account, or dispose of client funds or securities for any purpose other than authorized trading. All client accounts are kept by a qualified custodian in the client's name.

We do not have discretionary authority to determine the broker or dealer to be used by a client nor are we able to negotiate the commission rates to be paid by a client for brokerage transactions.

## Item 17: Proxy Voting

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West Wind will not ask for or accept voting authority for client-owned securities. Clients will receive proxies directly from the issuer of the security or their account custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18: Financial Information

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### A. Balance Sheet

West Wind does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we do not need to include a balance sheet with this brochure.

B. Financial Conditions That Could Impair Our Ability to Meet Client Commitments

Neither West Wind nor its management has any financial conditions that are likely to reasonably impair our ability to meet our contractual obligations to clients.

C. Bankruptcy Petitions

Neither West Wind nor its management has been the subject of a bankruptcy petition in the last 10 years.

*West Wind Wealth Management, LLC*

*Brochure Supplement*

*This brochure supplement provides information about George Watkins that supplements the West Wind Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact George Watkins at (757) 619-0456 or [george@invest-it-yourself.com](mailto:george@invest-it-yourself.com) if you did not receive West Wind Wealth Management, LLC's brochure, or if you have any questions about the contents of this supplement. Additional information about George Watkins is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

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**Item 2: Educational Background and Business Experience**

Name: George Watkins  
Year of Birth: 1979  
Education: B.S. Economics, Duke University (2001)  
MBA, Harvard Business School (2008)  
Background: Nuclear-trained Surface Warfare Officer, United States Navy (2001-2006)  
President of West Wind Wealth Management, LLC (2009-present)  
Director, Red Ventures (2010-present)

**Item 3: Disciplinary Information**

There are no legal or disciplinary events material to a client's or prospective client's evaluation of George Watkins.

**Item 4: Other Business Activities**

George's principal business activity is unrelated to providing investment advice. He works approximately 40 hours per week as a sales and marketing executive. In this role, he does not have any business relationships and/or partnerships that could create a potential conflict of interest in investment advisory matters.

**Item 5: Additional Compensation**

George does not receive any economic benefits from providing advisory services to individuals who are not clients of West Wind Wealth Management, LLC.

**Item 6: Supervision**

George is not supervised by another individual at West Wind Wealth Management, LLC.