

## **Item 1 - Cover Page**

# **Wynden Capital Management, LLC**

**CRD# 149866**

455 East Paces Ferry Road  
Suite 332  
Atlanta, Georgia 30305

(404) 812-1933

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

## **February 29, 2012 Brochure**

This brochure provides information about the qualifications and business practices of Wynden Capital Management, LLC ("Wynden"). If you have any questions about the contents of this brochure, please contact us at (404) 812-1933 or [john@wyndencapital.com](mailto:john@wyndencapital.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Additional information about Wynden also is available on the SEC's website at **[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

## **Item 2 - Summary of Material Changes**

As you may be aware, the format that registered investment advisers are required to use in order to inform clients of the nature of advisory services provided, types of clients served, fee charged, potential conflicts of interest and other information has changed.

In the past, we were only required to offer you our updated brochure on an annual basis. Under the new rules, we are required to annually provide each client with these amended disclosures, rather than merely making the offer. If there had been changes to our brochure since our last regulatory filing, we would be required to inform you of these changes. However, there have been no material changes to the Firm's brochure since its last required filing, dated March 31, 2011.

### Item 3 - Table of Contents

### Page

Item 1 - Cover Page .....	1
Item 2 - Summary of Material Changes .....	1
Item 3 - Table of Contents .....	2
Item 4 - Advisory Business .....	3
Item 5 - Fees and Compensation .....	4
Item 6 - Performance-Based Fees and Side-By-Side Management .....	4
Item 7 - Types of Clients .....	5
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....	5
Item 9 - Disciplinary Information .....	6
Item 10 - Other Financial Industry Activities and Affiliations .....	6
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ....	6
Item 12 - Brokerage Practices .....	7
Item 13 - Review of Accounts .....	10
Item 14 - Client Referrals and Other Compensation .....	10
Item 15 - Custody.....	10
Item 16 - Investment Discretion.....	11
Item 17 - Voting Client Securities .....	11
Item 18 - Financial Information.....	12
Brochure Supplement.....	Appendix A

#### ***Item 4 - Advisory Business***

##### **General Information**

Wynden Capital Management, LLC was formed in 2009 and provides financial planning and portfolio management services to its clients. At the outset of each client relationship, Wynden spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Wynden generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Wynden will make on behalf of the client in order to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

##### **Financial Planning**

Part of the overall service offered by Wynden is limited financial planning. The purpose of this limited service is generally to assist the client and Wynden in determining the Investment Plan for the portfolio. Financial Planning is not offered as a stand-alone service or for a separate fee, but is typically provided in conjunction with the management of the portfolio.

##### **Portfolio Management**

As described above, at the beginning of a client relationship, Wynden meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Wynden based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Wynden will manage the client's investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, Wynden will have the authority to supervise and direct the portfolio without prior consultation with the client. Clients who choose a non-discretionary arrangement must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, the client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

Notwithstanding the foregoing, clients may impose certain written restrictions on Wynden in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments (e.g., "sin stocks") in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolios. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within

the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Wynden.

#### Principal Owners

John Wall McCollum is the sole principal owner of Wynden. Please see **Brochure Supplement** for more information on Mr. McCollum.

#### Type and Value of Assets Currently Managed

As of December 31, 2011, Wynden managed \$25,154,249 on a discretionary basis, and \$1,855,351 of assets on a non-discretionary basis.

### ***Item 5 - Fees and Compensation***

#### General Fee Information

Fees paid to Wynden are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Fees paid to Wynden are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Wynden and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

#### Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

First \$1,000,000	1.00%
Next \$1,000,000	0.75%
Balance above \$2,000,000	0.50%

The minimum portfolio value is generally set at \$1,000,000 and the minimum annual fee for any account is \$5,000. Wynden may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Wynden deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in arrears. If management begins after the start of a quarter, fees will be prorated accordingly. Fees are normally debited directly from client account(s), unless other arrangements are made.

Either Wynden or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client, and any fees due to Wynden from the client will be invoiced or deducted from the client's account prior to termination.

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

Wynden does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Wynden has no performance-based fee accounts, it has no side-by-side management.

## ***Item 7 - Types of Clients***

Wynden serves individuals, trusts, estates and charitable organizations. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$1,000,000, and the annual minimum fee charged is \$5,000. Under certain circumstances and in its sole discretion, Wynden may negotiate such minimums.

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

### Methods of Analysis and Investment Strategies

In accordance with the Investment Plan, Wynden generally selects individual stocks, individual high grade municipal and taxable bonds, ETF's, and to a lesser degree mutual funds, for client accounts.

Focusing on fundamental analysis, Wynden performs valuation analysis on individual equity securities to estimate intrinsic value. Using a discounted cash flow/earnings model, Wynden uses a proprietary method for determining the appropriate discount rate.

For bonds, Wynden generally relies on ratings agencies, ignoring bond insurance and looking instead to the underlying rating for municipals. Wynden frequently looks for contrarian opportunities to acquire mispriced fixed income securities.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Wynden may evaluate and select high grade municipal and taxable bonds based on a number of factors including, without limitation, rating, yield and duration.

ETF's and mutual funds are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

### Risk of Loss

While Wynden seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While Wynden manages client investment portfolios based on Wynden's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Wynden allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Wynden's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, Wynden may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment

funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Equity Market Risks.* Wynden will invest generally portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* Wynden may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* Wynden may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

#### ***Item 9 - Disciplinary Information***

Wynden has no disciplinary events to report.

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

Neither Wynden nor its Management Person has any other financial industry activities or affiliations to report.

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

##### **Code of Ethics and Personal Trading**

Wynden has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Wynden's Code has several goals. First, the Code is designed to assist Wynden in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Wynden owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires Wynden associated persons to act with honesty, good faith and

fair dealing in working with clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Wynden's associated persons (managers, officers and employees). Under the Code's Professional Standards, Wynden expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Wynden associated persons are not to take inappropriate advantage of their positions in relation to Wynden clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Wynden's associated persons may invest in the same securities recommended to clients. Under its Code, Wynden has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

#### Participation or Interest in Client Transactions

As outlined above, Wynden has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, Wynden's goal is to place client interests first.

Consistent with the foregoing, Wynden maintains policies regarding participation in initial public offerings (IPOs) and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If associated persons trade with client accounts (e.g., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Wynden's written policy.

### ***Item 12 - Brokerage Practices***

#### Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Wynden seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Wynden may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Wynden's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Wynden may recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets. Wynden may also effect trades for client accounts at Schwab, or may in some instances, consistent with Wynden's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although Wynden may

recommend that clients establish accounts at Schwab, it is ultimately the client's decision to custody assets with Schwab. Wynden is independently owned and operated and is not affiliated with Schwab.

Schwab provides Wynden with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as Wynden maintains a pre-established minimum amount of client assets in accounts at Schwab Advisor Services. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Wynden client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to Wynden other products and services that benefit Wynden but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Wynden accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Wynden in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Wynden's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help Wynden manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Wynden. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Wynden. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of Wynden personnel. In evaluating whether to recommend that clients custody their assets at Schwab, Wynden may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

#### Directed Brokerage

Clients may direct Wynden to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.



The arrangement that Wynden has with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers may in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing Wynden to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Wynden that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

#### Aggregated Trade Policy

Wynden may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in any such block. Block trading allows Wynden to execute equity trades in a timelier, equitable manner, and may reduce overall costs to clients.

Wynden will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of Wynden's Investment Advisory Agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Wynden's transactions in a given security on a given business day, with transaction costs generally shared pro-rata based on each client's participation in the transaction. On occasion, owing to the size of a particular account's pro rata share of an order or other factors, the commission or transaction fee charged could be above or below a breakpoint in a pre-determined commission or fee schedule set by the executing broker, and therefore transaction charges may vary slightly among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

Wynden will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of Wynden. Wynden's books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of

clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and Wynden will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

#### Cross Trades

From time to time, Wynden may direct a "cross trade" of securities (including, without limitation, fixed income securities) between client accounts, whereby Wynden arranges for one client account to purchase a security directly from another client. In such cases, Wynden will seek to obtain a price for the security from one or more independent sources. Wynden is not a broker-dealer and receives no compensation from a cross trade; however, the broker-dealer facilitating the cross trade normally charges administrative fees to the clients' accounts.

Wynden may direct a cross trade when Wynden believes that the transaction is in the best interest of the clients, that no client will be disfavored by the transaction, and that the transaction receives the best execution.

#### ***Item 13 - Review of Accounts***

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Wynden. These factors may include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. John McCollum, Wynden's Managing Member, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Wynden provides at least an annual report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

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

As noted above, Wynden may receive some benefits from Schwab based on the amount of client assets held at Schwab. Please see ***Brokerage Practices*** for more information. However, neither Schwab nor any other party is paid to refer clients to Wynden.

#### ***Item 15 - Custody***

Schwab is the custodian of nearly all client accounts at Wynden. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Wynden of any questions or concerns. Clients are also asked to promptly notify Wynden if the custodian fails to provide statements on each account held.

From time to time and in accordance with Wynden's agreement with clients, Wynden will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. There may at times be small differences due to the timing of dividend reporting and pending trades.

#### ***Item 16 - Investment Discretion***

As described in the **Advisory Business** section, Wynden will accept clients on either a discretionary or non-discretionary basis. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Wynden the authority to carry out various activities in the account, generally including the following: execute trades; request checks on behalf of the client; and, deduct advisory fees directly from the account. The client generally has the ability to exclude any of the above authorizations if desired. For non-discretionary accounts, the client normally executes an LPOA; however, in accordance with the agreement between Wynden and the client, Wynden will not execute trades until the client has had the opportunity to approve the trades. As in the case of a discretionary arrangement, Wynden's authority under the LPOA can be limited at the client's discretion.

#### ***Item 17 - Voting Client Securities***

With respect to securities selected on behalf of the client in a managed account or recommended to a client, Wynden may vote proxies where required under client agreements. Wynden seeks to vote proxies in the best interest of the client(s) holding the applicable securities. In voting proxies, Wynden considers factors that Wynden believes relate to the client's investment(s) and factors, if any, that are set forth in written instructions from the client.

In general, Wynden believes that voting proxies in accordance with the following guidelines, with respect to such routine items, is in the best interests of our clients. Accordingly, Wynden generally votes **for**:

- The election of directors (where no corporate governance issues are implicated);
- Proposals that strengthen the shared interests of shareholders and management;
- The selection of independent auditors based on management or director recommendation, unless a conflict of interest is perceived;
- Proposals that Wynden believes may lead to an increase in shareholder value;
- Management recommendations adding or amending indemnification provisions in charter or by-laws; and
- Proposals that maintain or increase the rights of shareholders.

Wynden will generally vote **against** any proposals that Wynden believes will have a negative impact on shareholder value or rights. If Wynden perceives a conflict of interest, Wynden's policy is to notify affected clients so that they may choose the course of action they deem most appropriate.

A copy of our complete policy, as well as records of proxies voted; are available to clients upon request. As required under the Advisers Act, such records are maintained for a period of five (5) years.

***Item 18 - Financial Information***

Wynden does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

**Brochure Supplement for**  
**John W. McCollum, CFA**

**CRD# 2294806**

**of**

**Wynden Capital Management, LLC**

455 East Paces Ferry Road  
Suite 332  
Atlanta, Georgia 30305

(404) 812-1933

[www.WyndenCapital.com](http://www.WyndenCapital.com)

March 30, 2011

This brochure supplement provides information about Mr. McCollum, and supplements the Wynden Capital Management, LLC ("Wynden") brochure. You should have received a copy of that brochure. Please contact Wynden at (404) 812-1933 if you did not receive Wynden's brochure, or if you have any questions about the contents of this supplement.

Additional information about Mr. McCollum is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

---

***Educational Background and Business Experience***

John W. McCollum (year of birth 1970) is the President and Founder of Wynden Capital Management, LLC. Following graduation from St. John's School in Houston, TX, Mr. McCollum attended Vanderbilt University in Nashville, TN where he earned a Bachelor of Arts degree in Political Science. Following graduation from Vanderbilt in 1992, Mr. McCollum was employed as a Fixed Income Trading and Underwriting Assistant at Cowen & Co., in Houston, TX. At Cowen, Mr. McCollum was involved in all aspects of fixed income sales and trading including bidding securities, valuing portfolios, pricing bids for underwriting, and securities transactions for clients. In mid-1993, Mr. McCollum was invited to join a group of partners who left Cowen & Co. to form Harris Webb & Garrison. At Harris Webb & Garrison, Mr. McCollum handled all fixed income transactions on behalf of the firm's clients.

In the Fall of 1995, Mr. McCollum enrolled in the Graduate School of Business at the University of Texas at Austin. While at UT, Mr. McCollum served as a portfolio manager of the MBA Investment Fund, LLC, a private investment fund managed by a select group of students. Mr. McCollum earned

a Master's in Business Administration with a concentration in Finance from the University of Texas in May of 1997.

Following graduation from the University of Texas, Mr. McCollum joined Dell Financial Services, LP (DFS), a captive finance subsidiary of Dell Computer Corp. in Austin, TX. At DFS, Mr. McCollum served in a variety of roles of increasing responsibility including Sr. Treasury Manager and Director of Operations, Public and Americas-International. DFS provided leasing services to customers of Dell Computer Corporation. During Mr. McCollum's time with DFS, lease originations grew from virtually zero to over \$1 billion annually. Mr. McCollum also worked for Dell Computer Corporation as a Senior Manager – Strategy and Business Development in the very large corporate accounts division of the company.

In September of 2001, Mr. McCollum joined Heritage Trust Company in Oklahoma City as a portfolio manager. Over the next 8 years, Mr. McCollum developed the successful investment strategy employed by Heritage Trust and, in 2005, became the Chief Investment Officer and was responsible for an investment department managing over \$450 million in discretionary client assets. Following the founding of Wynden Capital Management, Mr. McCollum joined the Board of Directors of Heritage Trust Company and serves as the chairman of the compensation committee.

Mr. McCollum holds the Chartered Financial Analyst® designation\* and has served as Vice President – Programs of the CFA Society of Atlanta and presently serves as trustee of the organization. Mr. McCollum also serves as a Trustee of the John Austin Cheley Foundation in Estes Park, CO, as a trustee of the Buckhead Christian Ministry in Atlanta, GA, on the Chapter for Cathedral of St. Philip in Atlanta, GA, and has served on the board of directors of the MBA Alumni Network for the McCombs School of Business at the University of Texas at Austin.

Mr. McCollum is married and has three children.

\* The Chartered Financial Analyst® (“CFA”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA® Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

### ***Disciplinary Information***

There is no disciplinary information to report regarding John.

### ***Other Business Activities***

Mr. McCollum is not engaged in any other business activities.

### ***Additional Compensation***

Mr. McCollum has no other income or compensation to disclose.

***Supervision***

As President of Wynden Capital Management, LLC, Mr. McCollum, supervises all duties and activities of the firm, and reviews all client accounts. His contact information is on the cover page of this disclosure document.