

**ITEM 1: Cover Page for  
PART 2B OF FORM ADV:  
BROCHURE SUPPLEMENT  
DATED MARCH 2012**

**JACKIE WILLIAM MOORE, III**

**WAMBOLT & ASSOCIATES, LLC (“W&A”)  
13976 W. BOWLES AVENUE, STE. 200,  
LITTLETON, CO 80127**

**FIRM CONTACT: GREG WAMBOLT, CHIEF COMPLIANCE OFFICER**

**FIRM’S WEBSITE ADDRESS: [WWW.WAMBOLTANDASSOC.COM](http://WWW.WAMBOLTANDASSOC.COM)**

**This brochure supplement provides information about Jack Moore that supplements our brochure. You should have received a copy of that brochure. Please contact Greg Wambolt, Chief Compliance Officer of W&A, if you did not receive W&A’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jack Moore is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

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

We are required to disclose the following information about Mr. Moore:

### **Jackie William Moore, III**

**YOB:** 1970

**Education:** University of Nebraska, Omaha NE, BA 1993

#### **Business Background:**

June, 2010-Present, Wambolt & Associates, LLC, Littleton CO, Investment Adviser Representative

Wambolt & Associates, Littleton CO - January 2006- June, 2010, Associate Wealth Management Advisor

Allstate Insurance- June 2004- January 2006- Agent

Pacer International- June 2002-June 2004- Project Manager/Executive Assistant

Janus Capital- March 1998- June 2002- Investor Communications Manager

## **Item 3 Disciplinary Information<sup>1</sup>**

If there are legal or disciplinary events material to your evaluation of Mr. Moore, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

## **Item 4 Other Business Activities**

- A. If Mr. Moore is actively engaged in any investment-related business or occupation, including if Mr. Moore is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

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<sup>1</sup> **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Moore to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Moore to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

We have nothing to disclose in this regard.

- B. If Mr. Moore is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Mr. Moore's income or involve a substantial amount of Mr. Moore's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Mr. Moore's time and income, we may presume that they are not substantial.

As a licensed insurance agent, Mr. Moore may recommend to advisory clients a variety of insurance products, and may offer insurance products to Advisor's clients for which he may receive compensation.

## **Item 5            Additional Compensation**

If someone who is not a client provides an economic benefit to Mr. Moore for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Mr. Moore's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

## **Item 6            Supervision**

We are required to explain how we supervise Mr. Moore, including how we monitor the advice Mr. Moore provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Moore's advisory activities on behalf of our firm.

Mr. Gregory Wambolt, Chief Compliance Officer of W&A, supervises and monitors Mr. Moore's activities on a regular basis. Mr. Wambolt reviews all outgoing correspondence for written financial advice that Mr. Moore provides to his clients. Please contact Mr. Wambolt if you have any questions about Mr. Moore's brochure supplement at 720-962-6700.

## **Item 7            Requirements for State-Registered Advisers**

We are SEC registered, we have nothing to disclose in this regard.

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**ERIN O'NEILL**

**WAMBOLT & ASSOCIATES, LLC ("W&A")  
13976 W. BOWLES AVENUE, STE. 200,  
LITTLETON, CO 80127**

**FIRM CONTACT: GREG WAMBOLT, CHIEF COMPLIANCE OFFICER**

**FIRM'S WEBSITE ADDRESS: [WWW.WAMBOLTANDASSOC.COM](http://WWW.WAMBOLTANDASSOC.COM)**

**This brochure supplement provides information about Erin O'Neill that supplements our brochure. You should have received a copy of that brochure. Please contact Greg Wambolt, Chief Compliance Officer of W&A, if you did not receive W&A's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Erin O'Neill is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

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

We are required to disclose the following information about Ms. O'Neill:

### **Erin O'Connor O'Neill**

**YOB:** 1968

**Education:** University of Colorado, Boulder CO, BA 1991

### **Business Background:**

June, 2010-Present, Wambolt & Associates, LLC, Littleton CO, Investment Adviser Representative

April 2004-June, 2010, Wambolt & Associates, Littleton CO, Associate Wealth Management Advisor

Salomon Smith Barney, Los Angeles CA, 3/01-10/02, Compliance Manager

Dreyfus Brokerage Services, Los Angeles CA, 2/94-3/01, Director of Training

## **Item 3 Disciplinary Information<sup>1</sup>**

If there are legal or disciplinary events material to your evaluation of Ms. O'Neill, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

## **Item 4 Other Business Activities**

- A. If Ms. O'Neill is actively engaged in any investment-related business or occupation, including if Ms. O'Neill is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

We have nothing to disclose in this regard.

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<sup>1</sup> **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Ms. O'Neill to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Ms. O'Neill to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

- B. If Ms. O'Neill is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Ms. O'Neill's income or involve a substantial amount of Ms. O'Neill's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Ms. O'Neill's time and income, we may presume that they are not substantial.

We have nothing to disclose in this regard.

## **Item 5            Additional Compensation**

If someone who is not a client provides an economic benefit to Ms. O'Neill for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Ms. O'Neill's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

## **Item 6            Supervision**

We are required to explain how we supervise Ms. O'Neill, including how we monitor the advice Ms. O'Neill provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Ms. O'Neill's advisory activities on behalf of our firm.

Mr. Gregory Wambolt, Chief Compliance Officer of W&A, supervises and monitors Ms. O'Neill's activities on a regular basis. Mr. Wambolt reviews all outgoing correspondence for written financial advice that Ms. O'Neill provides to her clients. Please contact Mr. Wambolt if you have any questions about Ms. O'Neill's brochure supplement at 720-962-6700.

## **Item 7            Requirements for State-Registered Advisers**

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**RYAN STOUT**

**WAMBOLT & ASSOCIATES, LLC (“W&A”)  
13976 W. BOWLES AVENUE, STE. 200,  
LITTLETON, CO 80127**

**FIRM CONTACT: GREG WAMBOLT, CHIEF COMPLIANCE OFFICER**

**FIRM’S WEBSITE ADDRESS: [WWW.WAMBOLTANDASSOC.COM](http://WWW.WAMBOLTANDASSOC.COM)**

**This brochure supplement provides information about Ryan Stout that supplements our brochure. You should have received a copy of that brochure. Please contact Greg Wambolt, Chief Compliance Officer of W&A, if you did not receive W&A’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about Ryan Stout is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

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

We are required to disclose the following information about Mr. Stout:

### **Ryan Charles Stout**

**YOB:** 1982

**Education:** University of Wyoming, Laramie, WY, Bachelor's in Finance, Bachelor's in Economics

**Professional Designations:** CFP® - November 2009

### **Business Background:**

October 2010 – Present, Wambolt & Associates, LLC, Littleton CO, Investment Adviser Representative

August 2006 - October 2010, TIAA-CREF, Denver, CO, Client Relationship Specialist

### **CFP® - Certified Financial Planner™:**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:



- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3            Disciplinary Information<sup>1</sup>**

If there are legal or disciplinary events material to your evaluation of Mr. Stout, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

### **Item 4            Other Business Activities**

- A. If Mr. Stout is actively engaged in any investment-related business or occupation, including if Mr. Stout is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

We have nothing to disclose in this regard.

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<sup>1</sup> **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Stout to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Stout to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

- B. If Mr. Stout is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Mr. Stout's income or involve a substantial amount of Mr. Stout's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Mr. Stout's time and income, we may presume that they are not substantial.

As a licensed insurance agent, Mr. Stout may recommend to advisory clients a variety of insurance products, and may offer insurance products to Advisor's clients for which he may receive compensation.

#### **Item 5            Additional Compensation**

If someone who is not a client provides an economic benefit to Mr. Stout for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Mr. Stout's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

#### **Item 6            Supervision**

We are required to explain how we supervise Mr. Stout, including how we monitor the advice Mr. Stout provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Stout's advisory activities on behalf of our firm.

Mr. Gregory Wambolt, Chief Compliance Officer of W&A, supervises and monitors Mr. Stout's activities on a regular basis. Mr. Wambolt reviews all outgoing correspondence for written financial advice that Mr. Stout provides to her clients. Please contact Mr. Wambolt if you have any questions about Mr. Stout's brochure supplement at 720-962-6700.

#### **Item 7            Requirements for State-Registered Advisers**

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**GREGORY WAMBOLT**

**WAMBOLT & ASSOCIATES, LLC (“W&A”)  
13976 W. BOWLES AVENUE, STE. 200,  
LITTLETON, CO 80127**

**FIRM CONTACT: GREG WAMBOLT, CHIEF COMPLIANCE OFFICER**

**FIRM’S WEBSITE ADDRESS: [WWW.WAMBOLTANDASSOC.COM](http://WWW.WAMBOLTANDASSOC.COM)**

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**Additional information about Gregory Wambolt is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

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

We are required to disclose the following information about Mr. Wambolt:

### **Gregory Alan Wambolt**

**YOB:** 1957

**Education:** WSC, Gunnison CO, Bachelor's in Business Management and Business Administration

**Professional designations:** CLU - October 1996, ChFC - October 1996, CFP – May, 1996

### **Business Background:**

June, 2010-Present, Wambolt & Associates, LLC, Littleton CO, Managing Member & Chief Compliance Officer

March 1986-May, 2010, Northwestern Mutual, DBA Wambolt & Associates, Littleton CO, Associate Wealth Management Advisor

Frontier Oil & Gas Supply, Denver CO, 1983-1986, President

### **CLU® - Chartered Life Underwriter:**

Mr. Wambolt has a professional designation, Chartered Life Underwriter. The CLU® is offered by The American College. To receive the CLU® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures. Three years of full-time business experience is required for all Huebner School designations. The three-year period must be within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience. Part-time qualifying business experience is credited toward the three-year requirement on an hourly basis, with 2,000 hours representing the equivalent of one year full-time experience.

The following activities meet the required business experience qualifications included in the CLU® certification process.

Insurance and health care:

- Field underwriting and management, including sales and service activities, supervision and management of persons involved in sales or services, or staff support of persons in these activities.
  - Company management and operations in positions involving substantial responsibility.
- Financial services and employee benefits
- Client service and related management, including direct contact with clients, supervision and management of persons involved directly in the process of providing financial services or employee benefits, or staff support of persons in these activities.
  - Financial institution management and operations in positions involving substantial responsibility.

Other:

- University or college teaching of subjects related to the Huebner School curriculum on a full-time basis at an accredited institution of higher education.
- Government regulatory service in a responsible administrative, supervisory, or operational capacity.
- Activities directly or indirectly related to the protection, accumulation, conservation, or distribution of the economic value of human life; these include the work of actuaries,

attorneys, CPAs, investment advisers, real estate investment advisers, stockbrokers, trust officers, or persons in other similar occupations.

All CLU®s who matriculated after June 30, 1989 are subject to the PACE Recertification Program. If you are a CLU® who falls into any of the following specified categories, you are required to earn 30 hours of CE credit every two years:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

If you have earned all 30 CE credits through The American College, you do not have to sign and file a statement of compliance. The College will record CE credits you earned at The College and notify you when you have met the requirements.

If you are a CLU® subject to PACE but do not fall into one of the above categories, you are exempt from the CE requirements. You will be required to notify The College of your exempt status every reporting period, as long as the exemption applies.

The following topics were covered under the program:

- Fundamentals of Insurance Planning
- Individual Life Insurance
- Life Insurance Law
- Fundamentals of Estate Planning
- Planning for Business Owners and Professionals
- Financial Planning: Process and Environment
- Individual Health Insurance
- Income Taxation
- Group Benefits
- Planning for Retirement Needs
- Investments
- Estate Planning

### **ChFC® - Chartered Financial Consultant:**

Mr. Wambolt has a professional designation, Chartered Financial Consultant. The ChFC® is offered by The American College. To receive the ChFC® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

Three years of full-time business experience is required for all Huebner School designations. The three-year period must be within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience. Part-time qualifying business experience is credited toward the three-year requirement on an hourly basis, with 2,000 hours representing the equivalent of one year full-time experience. The following activities meet the required business experience qualifications included in the ChFC® certification process.

Insurance and health care:

- Field underwriting and management, including sales and service activities, supervision and management of persons involved in sales or services, or staff support of persons in these activities.

- Company management and operations in positions involving substantial responsibility.

Financial services and employee benefits

- Client service and related management, including direct contact with clients, supervision and management of persons involved directly in the process of providing financial services or employee benefits, or staff support of persons in these activities.

- Financial institution management and operations in positions involving substantial responsibility.

Other:

- University or college teaching of subjects related to the Huebner School curriculum on a full-time basis at an accredited institution of higher education.

- Government regulatory service in a responsible administrative, supervisory, or operational capacity.

- Activities directly or indirectly related to the protection, accumulation, conservation, or distribution of the economic value of human life; these include the work of actuaries, attorneys, CPAs, investment advisers, real estate investment advisers, stockbrokers, trust officers, or persons in other similar occupations.

All ChFC®s who matriculated after June 30, 1989 are subject to the PACE Recertification Program. If you are a ChFC® who falls into any of the following specified categories, you are required to earn 30 hours of CE credit every two years:

- Licensed insurance agent/broker/consultant

- Licensed security representative/registered investment advisor

- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

If you have earned all 30 CE credits through The American College, you do not have to sign and file a statement of compliance. The College will record CE credits you earned at The College and notify you when you have met the requirements.

If you are a ChFC® subject to PACE but do not fall into one of the above categories, you are exempt from the CE requirements. You will be required to notify The College of your exempt status every reporting period, as long as the exemption applies.

The following topics were covered under the program:

- Financial Planning: Process and Environment
- Fundamentals of Insurance Planning
- Income Taxation
- Planning for Retirement Needs
- Investments
- Fundamentals of Estate Planning
- Financial Planning Applications

- The Financial System in the Economy
- Estate Planning Applications
- Executive Compensation
- Financial Decisions for Retirement

### **CFP® - Certified Financial Planner™:**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning

services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3            Disciplinary Information<sup>1</sup>**

If there are legal or disciplinary events material to your evaluation of Mr. Wambolt, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

### **Item 4            Other Business Activities**

- A. If Mr. Wambolt is actively engaged in any investment-related business or occupation, including if Mr. Wambolt is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

We have nothing to disclose in this regard.

- B. If Mr. Wambolt is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Mr. Wambolt's income or involve a substantial amount of Mr. Wambolt's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Mr. Wambolt's time and income, we may presume that they are not substantial.

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<sup>1</sup> **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Wambolt to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Wambolt to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.



As a licensed insurance agent, Mr. Wambolt may recommend to advisory clients a variety of insurance products, and may offer insurance products to Advisor's clients for which he may receive compensation.

**Item 5            Additional Compensation**

If someone who is not a client provides an economic benefit to Mr. Wambolt for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Mr. Wambolt's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

**Item 6            Supervision**

We are required to explain how we supervise Mr. Wambolt, including how we monitor the advice Mr. Wambolt provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Wambolt's advisory activities on behalf of our firm.

Mr. Wambolt is the Chief Compliance Officer and as such has no internal supervision placed over him. He is however bound by our firm's Code of Ethics and Written Supervisory Procedures.

**Item 7            Requirements for State-Registered Advisers**

We are SEC registered, we have nothing to disclose in this regard.